

Greater London Authority

**London Plan**

Integrated Impact Assessment

Consultation Document

Issue | November 2017

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 253269-00

**Ove Arup & Partners Ltd**  
13 Fitzroy Street  
London  
W1T 4BQ  
United Kingdom  
[www.arup.com](http://www.arup.com)

**ARUP**



## Non-technical summary

### Introduction

The spatial development strategy for London ('the London Plan') coordinates the Mayor's integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It acts as a framework for each of the 32 London Boroughs and the City of London Corporation to build their own strategies, with each authority required to demonstrate conformity to the overarching objectives of the London Plan. Following the 2016 mayoral election, a full review of the previous London Plan was commissioned, with the intent to adopt a new London Plan in 2019.

The Integrated Impact Assessment (IIA) process investigates the impacts of different proposals within the London Plan against environmental, equality, health, and community safety objectives. Through this process, the London Plan options and policies can be developed and refined to maximise benefits and minimise adverse effects.

This non-technical summary is provided to explain clearly and concisely the methodology and findings of the IIA, and will provide detail regarding the methodology used, comparison of different options, and a summary of the impacts of the London Plan on different areas for development.

### The London Plan – the Mayor's vision for London

A full review of the current London Plan, produced under the previous Mayor, was commissioned following the 2016 election of new Mayor Sadiq Khan. The London Plan is a comprehensive document that builds upon the Mayor's 'A City for All Londoners' vision. This was developed to assert the Mayor's intended direction for the city and invite early engagement in the development of emerging strategies.

The London Plan consists of overarching strategic options, which have been informed by the Mayor's vision for the city, and specific policies, that may be used to meet the goals of the strategic options. The draft London Plan consists of several strategic options which are presented for assessment under the IIA process. The results of the IIA will inform the final options and policies within the London Plan to maximise the benefits and minimise any adverse effects which may occur as the London Plan is implemented.

### Integrated Impact Assessment

The London Plan has been assessed with regard to four assessments that follow the Strategic Environmental Assessment process (SEA). The assessments forming the IIA are:

#### Strategic Environmental Assessment (SEA) Health Impact Assessment (HIA)

- Required by the Environmental Assessment of Plans and Programmes Regulations 2004;
- Identifies effects of the London Plan against general and specific environmental criteria;
- Justifies reasoning for selection of preferred options; and
- Proposes mitigation and monitoring methods to reduce any significant adverse environmental effects.
- Based upon non-statutory guidance, best practice, and plan-specific issues;
- Assesses impacts of policy implementation on population health;
- Uses guidance including London Healthy Urban Development Unit and Department of Health resources; and
- Determines effects on 'quality' of health based on Dahlgreen and Whitehead model (Figure 1).

#### Community Safety Impact Assessment (CSIA)

- Required by Crime and Disorder Act 1998 and Police Justice Act 2006;
- Identifies baseline crime statistics; and
- Assesses London Plan policies against types of crime and potential impacts of policies on crime.

#### Equality Impact Assessment (EqIA)

- Required by the Equality Act 2010;
- Identifies effects of London Plan on people sharing one or more protected characteristic (age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, gender reassignment);
- Screening identifies effects that cannot be easily mitigated; and
- Full assessment defines mitigation, monitoring, evaluation, and public consultation procedures that should be applied to policies which cannot be mitigated.

## Methodology

The assessment of emerging options and policies required the development of a robust integrated impact assessment framework. Specific objectives were developed for the framework, defined as statements of what is intended and specifying directions of change. These objectives aligned to international, national, regional and local plans, programmes and strategies relating to the environment, health, society and the economy. A total of 24 objectives were identified for inclusion within the IIA framework.

The IIA assessed the policy and options against this framework, identifying likely significant effects and in the case of the strategic options, also identified the preferred option to take forward based on the assessment. These effects were presented with a description of the probability, duration, frequency and reversibility of impacts. Where a significant effect was predicted, measures to mitigate against this were identified where possible to do so, such as the refinement or rejection of particular aspects of the policy.

### Significance ratings of environmental effects.

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of London and wider South East area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within London or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative	Minor negative effects are likely to be limited to small areas within London, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is effect is likely to be minor as is the magnitude of the predicted effect.
--	Significant negative	Likely to affect the whole, or large areas of London and the wider South East or the wider district area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
N/A	Not applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

## The IIA Process

The IIA process is comprised of the following four stages.

### A – Scoping

The scoping stage sought to gather information relating to the current environment and current projected changes of the environment within London and the Wider South East (WSE) area. The information was collected to form a baseline from which the effects of policies considered as part of the London Plan could be assessed. Key issues were identified relating to the topics under the IIA (Environmental, Equalities, Crime and Safety and Health), and these issues were investigated with consideration given to social and environmental aspects in addition to the environmental aspects required by the SEA Directive. Stakeholder engagement ensured that comments and feedback could be made at this early stage.

### B – Developing and refining options, and assessment of effects

This assessment stage examined the likely significant effects of the London Plan options and policies against the IIA framework. The options were assessed, with the justification for progressing or discarding these options presented.

The preferred policy options and identification of mitigation measures were also assessed. A full IIA of the preferred options was undertaken from a health, environmental, equality and safety perspective. Where the assessment identified significant negative effects, measures were identified that could be implemented to avoid or reduce this magnitude. These measures included refinement or amendments to emerging policies and were considered iteratively as the London Plan policies were developed.

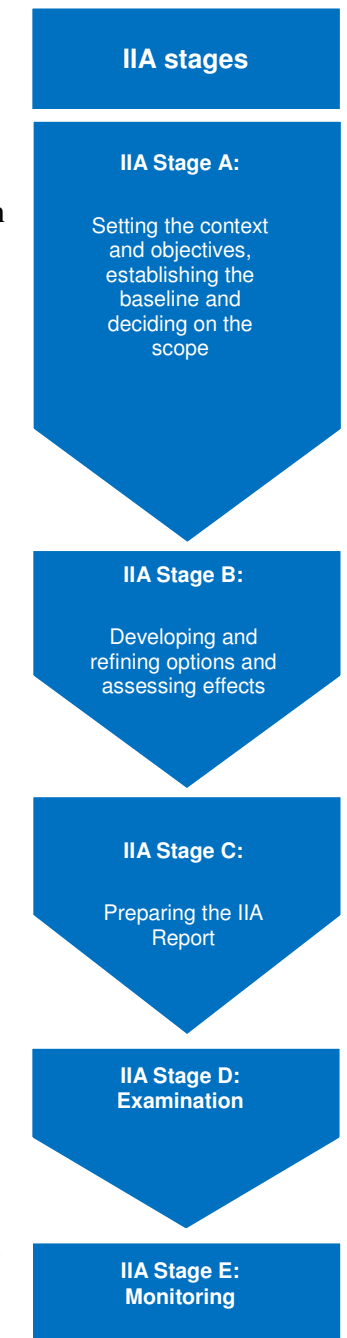
### C – Preparing the IIA Report

The IIA report summarises the assessment in terms of what was done and how it was undertaken. The purpose of the IIA report is to provide sufficient environmental, economic and social information to the GLA in order for a fully informed decision to be made regarding how policies should be adopted.

### D and E – Further Stages

The IIA and preferred policies will be subject to consultation under this stage. If, following consultation on the draft London Plan, changes are required that have not been subject to an IIA, then additional IIA will be undertaken. If this is necessary, then this IIA Report will be updated, with a final IIA Report accompanying the publication of the London Plan.

Once the London Plan has been formally published, an IIA Post-Adoption statement will be prepared that addresses the requirements of Stage E of the IIA process, monitoring.



## Establishing the IIA Framework

An important element of the IIA process is the determination of IIA objectives. An objective is a statement of what is intended, specifying a desired direction of change. The achievement of objectives is normally measured by using indicators, with objectives needing to be specific and measurable.

IIA objectives are used to show whether the policies of the London Plan are beneficial for the achievement of sustainable development, to compare the sustainability effects of alternatives, or to suggest improvements.

An objectives-led approach is considered to be most appropriate to assessing the London Plan as it enables assessment of the extent to which each aspect of the London Plan contributes towards delivery of each objective as opposed to just meeting prescribed targets. Thus a more qualitative approach is adopted that allows for a better identification and description of effects rather than attempting to assign a quantitative value, which is more limited and restrictive at this strategic level.

Draft IIA objectives have been developed in accordance with:

- The findings from the review of relevant plans and programmes and the baseline data;
- Consultation within the GLA (Steering Group); and
- Feedback from key stakeholders following a workshop held in June 2016.

IIA objectives align with wider international, national and local environmental, health, social and economic policy objectives and form the basis of what the new London Plan and other Mayoral strategies will be appraised against.

It is intended that the IIAs for all Mayoral strategies will be assessed against the same IIA objectives, with guide questions being different and relevant to the strategy being assessed.

During the preparation of each of the individual strategies, it may be determined that particular objectives are scoped out as they are deemed as not being applicable to the scope and intent of the strategy. In addition, the order of the IIA objectives may vary between the IIAs of the strategies to reflect the structure of the baseline for that particular strategy.

Alongside each IIA objective is a set of guide questions that will be used to assess whether the London Plan will help to achieve or conflict with the objective.

Guide questions are coloured to indicate which of the assessment elements of the IIA the question addresses in order to fully demonstrate how these assessments have been integrated as part of the IIA and to ensure that the relevant aspects of specific assessments are easily navigable. The colour coding of the assessments is:

A total of 24 IIA objectives have been derived for the assessment of the new London Plan. Figure 8.2 below shows the link between SEA Directive issues and IIA objectives (detailed list of the IIA objectives is presented in Table 16).

## Link between SEA topics and IIA Objectives

SEA Directive Topic	IIA Objective(s)
Material Assets	5, 6, 11, 23
Climatic Factors	14, 15, 16, 17, 19
Biodiversity	20
Fauna	20
Flora	20
Water	18
Soil	22
Air	14
Cultural heritage, architectural and archaeological heritage	13, 21
Landscape	7, 21
Population	1, 2, 3, 9, 10, 11, 12
Human health	1, 2, 3, 4, 8, 24

## The IIA Framework – objectives and key guide questions

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
Equality and inclusion	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	<p>Reduce poverty and social exclusion?</p> <p>Promote a culture of equality, fairness and respect for people and the environment?</p> <p>Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?</p> <p>Provide opportunities for people to choose an active, fulfilling life?</p> <p>Provide opportunities for Londoners to actively participate in the city's life, decision making and communities?</p> <p>Provide opportunities for Londoners of every background to connect?</p>
Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	
Health and Health Inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	<p>Improve access and equity of access to health and social care services and facilities?</p> <p>Reduce differentials in life expectancy and healthy life expectancy across London?</p> <p>Promote increases in physical activity, particularly in areas of health and social deprivation?</p> <p>Reduce inequalities in levels of physical activity?</p> <p>Improve the physical and mental health and wellbeing of communities?</p> <p>Support the provision of quality, affordable and healthy food?</p> <p>Reduce inequalities in physical and mental health and wellbeing?</p>

IHA Topic	IHA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
Crime, safety and security	To contribute to safety and security and the perceptions of safety	<p>Reduce levels of crime?</p> <p>Reduce the opportunity for crime and antisocial behaviour?</p> <p>Create a travel environment that feels safe to all users during the day time and night-time?</p> <p>Increase security and resilience to major incidents?</p> <p>Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?</p>
Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand	<p>Help to facilitate the delivery of house building that meets the needs of Londoners?</p> <p>Reduce homelessness and overcrowding?</p> <p>Increase the range and affordability of housing?</p> <p>Promote accessible and adaptable homes, improving choice for people who require them?</p> <p>Provide housing that encourages a sense of community and enhances the amenity value of the community?</p> <p>Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health?</p>
Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	<p>Make the best use of land through appropriate development on brownfield sites and use of existing transport network?</p> <p>Ensure that higher densities development does not adversely impact on different groups of people?</p> <p>Promote regeneration and provide benefits for existing communities?</p> <p>Integrate land use and transport?</p>
Design	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness, reducing the need to travel by motorized transport	<p>Conserve and enhance the townscape/cityscape character?</p> <p>Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</p> <p>Help to make people feel positive about the area they live in and promote social integration?</p> <p>Encourage an inclusive design approach taking into account the needs of a variety of users?</p> <p>Help to improve the wider built environment and create a sense of place and 'vibrancy'?</p> <p>Promote high quality design and sustainable design and construction methods?</p> <p>Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments?</p> <p>Retain the spatial diversity of communities?</p>
Accessibility	To maximise accessibility for all in and around London	<p>Improve accessibility to all public transport modes?</p> <p>Increase equality of access to services and facilities?</p> <p>Improve links between areas, neighbourhoods and communities?</p>
Connectivity	To enhance and improve connectivity for all to, from, within and around London and increase the	<p>Improve connectivity by public transport in outer London?</p> <p>Improve connectivity across the River Thames by all modes of transport, particularly in east London?</p>

IHA Topic	IHA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
	proportion of journeys made by sustainable and active transport modes	<p>Reduce traffic volumes and congestion on roads across all parts of London?</p> <p>Reduce congestion on public pavements and footpaths, especially in central London?</p> <p>Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)?</p> <p>Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</p> <p>Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</p> <p>Encourage active travel by creating safe, attractive routes?</p>
Economic competitiveness and employment	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all	<p>Help maintain London as an internationally competitive city?</p> <p>Increase London's productivity?</p> <p>Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive?</p> <p>Help generate satisfying, secure and rewarding new jobs?</p> <p>Create healthy, productive workplaces?</p> <p>Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration?</p> <p>Minimise barriers to employment (e.g. transport, financial, childcare)?</p> <p>Help reduce overall unemployment, particularly long-term and youth unemployment?</p> <p>Improve the resilience of business and the economy?</p> <p>Help to diversify the economy?</p> <p>Encourage business start-ups and support the growth of businesses, particularly SMEs?</p> <p>Enable people with physical and mental health conditions and disabilities to stay in employment?</p> <p>Support working families?</p> <p>Support social enterprise, voluntary and community sectors?</p> <p>Support small, local retail offers?</p>
Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	<p>Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery?</p> <p>Unlock land that has capacity for housing development?</p> <p>Provide accessible infrastructure to connect new housing developments to key services?</p> <p>Ensure equity of access to environmental, social and physical infrastructure?</p>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	<p>Improve accessibility for all to cultural venues</p> <p>Improve participation by all in cultural activities and support cultural activities that promote social integration?</p> <p>Provide access to affordable cultural activities in areas of deprivation?</p> <p>Help to provide cultural infrastructure needed to sustain and strengthen a growing sector?</p>
Education and skills	To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all	<p>Help to improve learning and the attainment of skills to the right employment opportunities?</p> <p>Ensure provision of sufficient school places to meet growing needs across London?</p> <p>Support transitions from education to work?</p> <p>Support London's status as an international city of learning, research and development?</p> <p>Encourage education and training that meets the needs of business, including vocational training?</p> <p>Support adult education to improve social mobility and life chances for all ages?</p> <p>Support early year's education and support, particularly in areas of deprivation?</p>
Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	<p>Reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions?</p> <p>Reduce the number of people exposed to particulates and NO<sub>2</sub> concentrations, particularly vulnerable people?</p> <p>Reduce inequalities in terms of access to clean air across London, particularly for those:</p> <ul style="list-style-type: none"> <li>who live in deprived areas?</li> <li>who live, learn or work near busy roads or construction sites?</li> <li>who are more vulnerable?</li> </ul> <p>Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals?</p> <p>Help to achieve national and international standards for air quality?</p> <p>Reduce costs to the economy resulting from premature deaths due to poor air quality?</p>
Climate change adaptation and mitigation	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	<p>Protect London from climate change impacts?</p> <p>Improve the micro-climate and ameliorate the impact of the heat island effect on Londoners?</p> <p>Help London to function during a flood event or heavy rainfall?</p> <p>Help London to function during periods of drought</p> <p>Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?</p>
	To help tackle climate change through reducing	Help London meet its emission targets?

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
	greenhouse gas emissions and moving towards a zero carbon London by 2050	<p>Reduce transport's contribution to CO<sub>2</sub> emissions?</p> <p>Reduce the built environment's contribution to CO<sub>2</sub> emissions?</p> <p>Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions?</p> <p>Promote the transition to a low carbon economy?</p> <p>Reduce carbon emissions by shifting to more sustainable modes of transport?</p>
Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	<p>Increase the proportion of energy both purchased and generated from renewable and sustainable resources?</p> <p>Contribute to the provision of smart and affordable energy system?</p> <p>Reduce the demand and need for energy?</p> <p>Promote generation of energy locally?</p> <p>Ensure that any supply shortages are addressed?</p> <p>Promote and improve energy efficiency?</p> <p>Promote the transition to a low carbon economy?</p> <p>Reduce impacts of fuel poverty, particularly for vulnerable groups?</p>
Water resources and quality	To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system	<p>Improve the quality of water bodies helping to meet the objectives of the Water Framework Directive?</p> <p>Reduce discharges to surface and ground waters?</p> <p>Support necessary improvements to the water systems infrastructure (water supply/ sewerage)?</p> <p>Reduce abstraction from surface and ground water sources?</p> <p>Reduce water consumption through the promotion of demand management?</p> <p>Protect and enhance the character and use of London's riverscapes and waterways?</p>
Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	<p>Minimise the risk of flooding from all sources of flooding to people, property, infrastructure?</p> <p>Manage residual flood risks appropriately and avoid new flood risks?</p> <p>Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?</p> <p>Promote sustainable urban drainage?</p>
Natural Capital and Natural Environment	To protect, connect and enhance London's natural capital including important habitats, species and landscapes) and the services and benefits it provides	<p>Protect and enhance the character of local greenscapes?</p> <p>Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?</p> <p>Help to acknowledge monetary value to natural capital of London</p> <p>Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network?</p> <p>Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance?</p>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
		<p>Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all?</p> <p>Promote and support the function of the Blue Ribbon Network?</p> <p>Specifically address deficiencies in access to open space?</p> <p>Create green spaces that are safe and accessible to all?</p> <p>Promote sensory environments and play spaces?</p>
Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	<p>Conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential?</p> <p>Respect visual amenity?</p> <p>Minimise the impact on the setting of heritage assets?</p> <p>Promote improved accessibility for all within existing historic/cultural/archaeological environments and their landscapes through inclusive design and management?</p> <p>Support and enhance cultural heritage?</p>
Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	<p>Promote the use of brownfield land?</p> <p>Prevent further soil degradation or erosion?</p> <p>Restore degraded soil?</p> <p>Minimise the risk of health impacts through contamination?</p> <p>Maximise the potential benefit of access to new employment and housing as a result of remediation?</p>
Materials and waste	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	<p>Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?</p> <p>Maximise use of innovative waste management techniques including smart technology?</p> <p>Help develop more efficient and sustainable freight transportation?</p> <p>Minimise negative impacts of waste processing and disposal on vulnerable groups?</p>
Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	<p>Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects?</p> <p>Help reduce actual noise levels and disturbances from noise?</p> <p>Minimise and reduce road, rail and aviation noise and vibration levels and disruption?</p> <p>Improve people's access to quiet/ tranquil spaces?</p> <p>Reduce night-time noise in residential areas?</p>

## Developing strategic options

As part of the assessment of the London Plan, high-level strategic policy options were developed and tested against the IIA framework to assess the strategic vision of the emerging London Plan. These strategic options were based upon the following six themes that are important for London:

<p><b>Building strong and inclusive communities:</b></p> <ul style="list-style-type: none"> <li>Focus on options to improve social inclusion;</li> <li>Recognises barriers to wealth and health inequalities;</li> <li>Improves social mobility for those living and working in London; and</li> <li>Improves transport infrastructure.</li> </ul>				
Infrastructure-led approach		Housing-led approach		Participation and citizenship-led approach
<p><b>Making the best use of land:</b></p> <ul style="list-style-type: none"> <li>Focus on spatial development options to encourage strategic land use;</li> <li>Recognises need to remain internationally competitive;</li> <li>Sustains and enhances global and national activities;</li> <li>Creates a more accessible London; and</li> <li>Provides social integration and cohesion.</li> </ul>				
Current London Plan	Sustainable Intensification	Polycentric Approach	Current London Plan and selective green belt release	Current London Plan and City Region approach
<p><b>Creating a healthy city:</b></p> <ul style="list-style-type: none"> <li>Focus on options to improve the health and wellbeing for Londoners;</li> <li>Recognises wellbeing in terms of both the environmental and provision of healthcare contexts;</li> <li>Encourages active lifestyle; and</li> <li>Improves population health and wellbeing.</li> </ul>				
Prevention		Cure		Spatially-targeted approach
<p><b>Delivering the homes Londoners need:</b></p> <ul style="list-style-type: none"> <li>Focus on options to provide appropriate and affordable housing;</li> <li>Recognises growing demand for housing and significant benefits of having a suitable home;</li> <li>Encourages appropriate housing to be built, in terms of both quality and affordability; and</li> <li>Ensures housing demand is met.</li> </ul>				
Temporary Housing	Delivering against housing need	Leaving delivery to market forces	Affordable Homes	
<p><b>Growing a good economy:</b></p> <ul style="list-style-type: none"> <li>Focus on options to maintain a sustainable economy;</li> <li>Recognises diversity of workforce in terms of skills, education, mobility, and health;</li> <li>Increases social mobility; and</li> <li>Encourages employment stability.</li> </ul>				
Investment in infrastructure	Dispersed growth	Market forces	Affordable workspace	
<p><b>Increasing efficiency and improving resilience:</b></p> <ul style="list-style-type: none"> <li>Focus on options to prevent threats and enhance resilience of London communities, infrastructure, and economy;</li> <li>Recognises global political and environmental threats faced by London and other major cities worldwide; and</li> <li>Improves resilience to future threats to ensure future stability.</li> </ul>				
Climate Change Mitigation	Climate Change Adaptation	Safe Designed City	Resource Efficiency	



## Appraisal of Strategic options

As part of the IIA process, different strategic options were suggested for the London Plan. These options were compared in terms of their performance against the 24 overall objectives, and resultant effects on environment, equality and diversity, health, and community safety. As a result of this process, the preferred option was chosen, or a final preferred option was drafted as a combined approach, which took in to account the IIA assessment. Summaries of the options assessed, including the preferred option ultimately selected, are summarised below.

### Building strong and inclusive communities

#### Infrastructure-led Approach

This option focuses on the delivery of physical, green and social infrastructure to benefit social objectives, and meet the needs of residents and communities. It supports the delivery of social benefits by ensuring the inclusive design of infrastructure which is open and accessible to all. This approach encourages the use of green infrastructure to improve the health and wellbeing of residents, increase biodiversity, and improve air quality. Economically, this option would improve digital connectivity to attract businesses and benefit employees, and provide greater access to employment opportunities. This option supports efficient use of land by promoting the use of brownfield sites but would require management to avoid over-development and soil degradation. There is the long term potential for this option to mitigate against climate change, contribute to local energy generation, and benefit flood defence regimes.

#### Housing-led Approach

This option promotes the development of different types of housing to meet the needs of potential residents, while targeting 50% affordable housing delivery for new developments. It would benefit housing quality and ensure delivery of affordable housing to a variety of groups to increase opportunities across the city. Health benefits would be seen as new homes are of higher quality, reducing damp and cold. Home-ownership under this option would increase, and co-living options would provide a cheaper alternative to private renting. The economic effects of this option would be positive as homes would be delivered based on need, allowing accessible and appropriate housing to be both available and affordable to accommodate a range of working styles (e.g. shift working patterns) and help to avoid employees being priced out of the city. This option promotes the use of brownfield sites to minimise environmental impacts associated with greenfield development.

#### Participation and Citizenship-led Approach

This option would facilitate community-oriented developments to promote community cohesion and social integration while enhancing community assets. There are numerous social benefits associated with this approach, including the delivery of services and facilities to reduce isolation and improve community health. Communities formed by a collective voice throughout the city, but with no spatial base, may not benefit from this to the same extent. Community-oriented developments would have a positive effect on actual and perceived safety and crime, and would ensure that appropriate facilities and services were available to support this. This option would also support the delivery of new, high quality, and energy efficient housing, however a focus on the wider community may mean that certain groups are not accounted for. Community-led design would positively affect economic prosperity by

providing places in which people are happy to live and work, thereby decreasing barriers to employment and education. Finally, this option would support the role cultural assets have in the community and facilitate the protection and enhancement of these assets.

#### Preferred option

A preferred option was developed, which ultimately incorporated aspects of each of the original options, focusing on complimentary measures that achieved maximum potential. The preferred option aims to promote openness, diversity, and equality by providing good-quality services and amenities, increasing social integration to reduce isolation, and supporting equal access to streets and public spaces. It promotes good design of developments to increase safety and foster a sense of community ownership amongst all Londoners, whilst recognising the current barriers to wealth and health inequalities. This option has positive social, design, crime and safety, and accessibility benefits. It supports accessible streets, public places, and public transport to ensure connectivity for all, while promoting healthy and inclusive design to create a sense of pride and ownership within a community. The economic benefits of this option include tackling poverty and deprivation by providing appropriate and affordable housing security which opens up access to employment and education and diversifies the economy.

### Making the best use of land

#### Current London Plan

This option continues following the objectives of the current London Plan, focusing economic growth around the Central Activity Zone (CAZ), Isle of Dogs, town centres, and strategic outer London, with housing growth in key Opportunity Areas. Whilst this would go some way to promote positive long term effects on housing objectives and the social and health benefits associated with high quality new homes in London, the level of growth would be insufficient to meet future demands. This option does support the use of brownfield sites and the delivery of industrial, residential, and mixed-use developments to encourage growth. This would benefit businesses and residents throughout the city, however this benefit would not necessarily be sustainable as demand increases.

#### Polycentric Approach

This option supports the dispersal of growth across town centres in inner and outer London. It aims to deliver housing in a range of areas alongside economic functions. It promotes town centres outside the CAZ, a revitalisation of town centres, and improving the orbital transport network. The option does not support the release of industrial land. Infrastructure objectives would be met with the delivery of housing, transport, and social and physical infrastructure. It would have a net positive effect on housing, supporting health benefits and alleviating homelessness. Economic benefits would be seen in local economies, increasing employment access particularly for those with mobility issues. The dispersed economic growth could limit London's international competitiveness by reducing the viability of economic centres such as the Isle of Dogs. Dispersed growth could be difficult to sustain equally, and would increase the complexity of public transport travel patterns which may result in less efficient public transport.

### **Current London Plan and selective green belt release**

This option continues with the objectives set out in the current London Plan and considers releasing green belt land to serve the local population with new neighbourhood centres. This option supports housing objectives by facilitating the large scale delivery of new homes as part of the current London Plan approach, whilst facilitating the limited release of land in the green belt in sustainable locations, determined through the Local Plan process. However, similar drawbacks to those associated with the current land are likely to be experienced, namely that this increased growth does not go far enough in terms of satisfying the required development in London. Infrastructure and land use objectives are met by this option through the release of low performing green belt land to ensure a range of developments are completed which subsequently unlock economic growth. This benefits businesses and residents, creating jobs throughout the city. This option could have negative environmental effects, since it risks impacting habitats within the green belt and puts natural capital at risk.

### **Current London Plan and City Region approach**

This option continues with the objectives set out in the current London Plan and also supports investment in development and growth outside London, into the Wider South East (WSE) region to achieve mutual benefits. Long term positive objectives would result in the delivery of housing in the WSE region, resulting in associated health benefits as new homes are less likely to suffer from cold, damp and other structural issues. The provision of new housing would also alleviate problems related to homelessness and overcrowding. However, the level of development required in London is unlikely to be satisfied by adopting this approach. Green spaces would benefit from this option, ensuring that natural capital is protected and enhanced, increasing access to the natural environment around London and providing the associated health and wellbeing benefits associated with access to green space. The option promotes positive effects on infrastructure and land use objectives, delivering improved infrastructure throughout London and the WSE region. This would have positive economic benefits since it would make businesses more accessible, thereby increasing their competitiveness, however it may drive growth out of London. Increasing transport between London and the WSE region would result in negative air quality and climate change impacts, since growth would be encouraged over a wider area thereby increasing the need for transport of increasing amounts of goods, waste, and individuals over a larger area, which would increase emissions and decrease air quality.

### **Preferred option - Sustainable Intensification**

This is the preferred option to meet this Strategic Policy. It seeks to ensure that economic growth is focussed around the CAZ, Isle of Dogs, Old Oak Common and Stratford, alongside town centres and inner and outer London. It aims to ensure that housing is delivered in residential-led Opportunity Areas, town centres, and other sites throughout London. Housing-led mixed use redevelopments would support a design-led approach to maximise densities in town centres, especially areas with high connectivity to public and active transport. This option would maximise available development through the intensification of existing sites as well as the identification of additional development potential. This option supports the protection of natural and cultural capital, committing to provide 50% green cover across London and protecting local spaces. Transport growth would be strategic, through investment in active and public transport infrastructure. Industrial land would be managed to make more effective use of existing floor place, and place residential land near to complementary industries.

This option would help preserve existing open space supporting social objectives and encourage active transport to deliver health benefits and reduce emissions. Housing delivery objectives would be met with a design-led and needs-based approach to housing development, alongside provision of transport infrastructure, to underpin sustainable growth in brownfield sites, and inclusivity. Economically, this option supports the delivery of business and residential space to keep London competitive, encourage efficient use of land, and ensure growth and economic diversification is facilitated. In promoting public and active transport options, this option reduces emissions and noise, and improves air quality. Green infrastructure would facilitate habitat, species, and landscape protection even in built up areas. This option commits to providing London with 50% green space cover, which could off-set any increased flood risk caused by high density developments.

## **Creating a healthy city**

### **Prevention**

This option targets the underlying causes of health problems across the population and encourages Healthy Streets, good building design, and green space to promote healthier lifestyle choices. This option has social benefits associated with the provision of green and open spaces, such as the promotion of mental wellbeing, relaxation, community ownership, reduced isolation, and encourages outdoor exercise. These benefits promote greater health and wellbeing, which can increase workplace productivity to deliver economic benefits. This option promotes good housing design to deliver high quality and accessible homes which are at lower risk from mould and damp. The investment in Healthy Streets would promote connectivity and increase access to public transport. The provision of green space would benefit the environment, safeguarding habitats and species, and improving air quality.

### **Cure**

This option focuses on immediate provision of health and social care facilities to address existing health issues across London. The option has short-term benefits to health and health inequalities by increasing access to healthcare services. Short term economic benefits may be seen due to the reduction in the amount of time spent on sick leave and encouraging people to recover quickly and manage their health conditions. However, this option may not have positive long term effects since the underlying causes of ill-health are not addressed.

### **Spatially-targeted approach**

This option outlines a spatial strategy to improve overall health and reduce health inequalities by managing health and targeting housing, education, and employment inequalities. By spatially targeting health issues, this option facilitates health improvements across the population and supports social objectives. This approach encourages good design of a local area to encourage active travel, exercise, and social integration. Economic prosperity is realised through this option by improving the overall health and wellbeing of residents, which reduces productivity lost to sick days and increased education opportunities. Environmentally, this option supports the provision of green and open space for activities such as exercise, relaxation and mindfulness.

### **Preferred option**

The preferred option is a combination of the above approaches. It simultaneously addresses the underlying issues of ill-health, improving access to health care facilities, and spatially targeting

deprived areas and vulnerable individuals. This option would have a positive effect on social objectives by providing access to healthy infrastructure, good quality green space, and active transport which promotes physical activity, community inclusion, and improved physical and mental health. Wider economic prosperity is achieved by reducing productivity lost through sick days, and recognising the effects of education and employment on health and seeking to maximise these opportunities. Design would support regeneration objectives to deprived areas, providing modern high quality homes and green infrastructure to reduce cold and damp, and create a sense of place within the community respectively. Green infrastructure benefits habitats and species, and improves air quality. Accessibility and connectivity through the provision of healthy transport would have positive impacts on climate change, reducing emissions and improving air quality, as well as reducing demand on private vehicle transport.

## Delivering the homes Londoners need

### Temporary housing

This option prioritises the delivery of temporary housing across London. It supports short term social and economic objectives by alleviating homelessness and providing access to employment and education opportunities. It supports the provision of modern, high quality, and safe homes, but does not address the issue of affordability and fails to provide permanent housing, or meet long term wider housing requirements. This would limit social cohesion and wider access to employment/education and could facilitate crime. This option would also limit infrastructure investment to help improve the area.

### Delivering against housing need

This option aims to deliver housing based on need by providing different types and sizes of accommodations, particularly for families, individuals with accessibility issues, and those with other specific needs. This option would have positive social and economic impacts, by increasing the range of housing on the market and providing more choice, particularly those with specific needs. New homes would be more energy efficient and less susceptible to cold and damp issues. The option is likely to encourage investment in physical and social infrastructure. However, delivery of housing under this option does not necessarily consider affordability, and may price some workers out of the city. Infrastructure objectives would be met in the delivery of housing and wider infrastructure with efficient use of brownfield land. Design would be promoted to meet the needs of the local community.

### Leaving delivery to market forces

This option focuses on leaving housing delivery to market-led forces, which could result in some positive economic and social effects. While newer houses are associated with health benefits due to a reduced likelihood of cold and damp, housing would likely be delivered as a ‘mass market’ product, resulting in smaller house sizes. This option may not address homelessness or overcrowding, and may not take into account the needs of disadvantaged groups in London. Affordability would also not be considered, potentially pricing workers out of the city. Market-led homes may also not be in a suitable location to support employment or education opportunities. If transport considerations are not taken into account, private vehicle use may increase resulting in congestion and poor air quality.

### Affordable homes

This option focuses on delivering affordable housing, ensuring that workers are not priced out of the city and Londoners have increased housing security, which would assist access to education and employment opportunities throughout London, as well as having direct effects in reducing overcrowding and homelessness. Economic objectives would be met by ensuring workers are not priced out of living in London, which would help to encourage a diverse workforce. This option supports infrastructure, design, and land-use objectives by promoting local regeneration and delivering planned infrastructure to support social, environmental, and physical objectives.

### Preferred option

The preferred option combines aspects of all the assessed options and aims to increase the number of houses on the market, including high quality and affordable new homes. The option would facilitate inclusive developments, supporting the needs of the wider community and those with specific requirements. Social objectives would be met through the development of inclusive communities and wide range of choice available. Affordable homes will ensure a diverse workforce is able to live in London and not be priced out. Health objectives would be met through reduced isolation and by meeting the needs of those with health conditions. The option would support efficient land use, infrastructure, connectivity, and housing objectives by using brownfield sites appropriately, delivering supporting infrastructure, and ensuring communities are connected by strong active and public transport networks. This option delivers economic benefits through provision of access to employment and education by ensuring affordable housing is available to the workforce, and supporting regeneration of deprived areas to create opportunities across London. The use of smaller brownfield sites also supports much smaller construction businesses, helping Small and Medium sized Enterprises (SMEs) to thrive and diversifying the economy further.

## Growing a good economy

### Investment in infrastructure

This option supports investment into workspaces and infrastructure of different types and sizes, and supports economic growth in the Central Activities Zone (CAZ), town centres, and across industrial locations. This would benefit social objectives by providing workspace for SMEs and therefore increasing diversity in the economy. Employment provides positive health benefits by improving financial security. The option would encourage infrastructure investment to provide social infrastructure such as community centres. Access to jobs for people with mobility issues is likely to be increased through this option, for example through improvements to digital infrastructure which support flexible working arrangements. This option would require significant investment which may mean that these effects are more difficult to realise in the short term.

### Dispersed growth

This option aims to disperse growth across local economies in London, and seeks to protect and enhance the existing workspace across London. Social objectives would be supported through the provision of local services, particularly benefitting those who are less mobile. Dispersed growth would not support the provision of appropriate and accessible infrastructure in all areas, meaning that local employment may only support specific groups. Transport infrastructure may not be delivered due to the

increased complexity of journey patterns, thereby limiting connectivity or increasing emissions. Local economies may benefit from this option, but it could reduce the competitiveness of London's traditional economic centres like CAZ. This option would not support sustainable land use or transport objectives as growth would not be integrated to maximise efficiency.

### **Market forces**

This option would largely leave economic growth to market forces, which may result in social aspects of sustainable development giving way to economic benefits. It is likely that this option would not go far enough to support vulnerable groups or possibly increase access to education and employment opportunities, therefore negatively impacting the health and wellbeing and financial security of individuals. Housing objectives could possibly be negatively affected by this option, since housing demand may not be met, affordable housing may be insufficient, and the balance between provision of land for housing and economic use would not be managed. A market-led approach may only address short term demand and may not address long term need. This option could support economic growth to provide a range of diverse employment opportunities. Without intervention, existing issues may remain or worsen. Lack of affordable workspace would limit the viability of SMEs, and impact creative industries. In addition, economic growth would not be equal, with some groups not accommodated. Environmental objectives are not directly affected but may still affect the economy, such as extreme weather events causing widespread damage and disruption.

### **Affordable workspace**

This option supports the delivery of affordable workspace in areas where cost pressures are high. This would provide social and economic benefits, supporting SMEs in becoming established and viable in the long term. Wider employment opportunities would arise through this to diversify the economy and help to ensure small businesses are not priced out of London.

### **Preferred option**

The preferred option aims to conserve and enhance London's economy by encouraging diversification of the economy, and ensuring economic success is shared more equitably. This option promotes growth in education, innovation and research and the development of a 24-hour city. It highlights the need to promote the wider city region and town centres across London, in addition to continuing the success of key economic zones in the Central Activities Zone and Northern Isle of Dogs. The option has many social benefits, including an increase in opportunity through the promotion of employment and education opportunities, which would result in a reduction in economic inequality. The option also supports health objectives through employment and financial security, and access to education. An increased level of financial security also has the potential to reduce crime and increase safety. Housing objectives may be met by encouraging employment and growth in the right areas to facilitate associated housing growth. This option encourages the integration of different land uses for efficient use of land in the provision of social and transport infrastructure. The option would encourage good design to increase accessibility and connectivity, ensuring modern, reliable infrastructure supports the needs of society, including investment in digital infrastructure and connectivity. This promotes modern business practices through the provision for accessible digital infrastructure and flexible working conditions, which could reduce barriers to employment. Economic competitiveness is improved through access to employment, increased productivity and diversity in the economy, and investment in opportunities, infrastructure and sub-economies. It removes barriers to economic prosperity by ensuring growth is

shared throughout London by investment in traditional economic hubs and new workspaces. A management of local neighbourhoods would be required to negate effects of noise created by a 24-hour economy.

## **Increasing efficiency and improving resilience**

### **Climate change mitigation**

This option supports carbon reduction measures to mitigate climate change. This supports economic objectives by promoting a zero carbon economy, and supports air quality objectives by reducing emissions and supporting health. However In the short term, this option may not deliver significant benefits, particularly with reference to threats such as flooding, which can be very costly.

### **Climate change adaption**

This option focuses on adapting to climate change measures by reducing flood risk and the impacts of extreme temperatures, and improving the overall resilience of London. There would be short and medium term benefits to economic objectives, since the risk of damage from imminent threats would be reduced. It does not however address the underlying causes of climate change and therefore would have little or negative economic impact in the long term, since infrastructure would need to be updated and improved which requires significant investment. The option would aim to ensure resilience of the housing stock and therefore enforce the provision of high quality housing, leading to widespread benefits particularly in deprived areas. High quality housing also supports health benefits. The impacts to cultural heritage would need management to ensure they were preserved during the retrofit of resilience measures. This option would support environmental objectives by using green infrastructure to intercept flood water and absorb carbon, enhancing resilience against flooding and climate change.

### **Safe designed city**

This option aims to protect residents from threats such as terrorism, crime, and fire, by focusing on security and safety. This would have economic and social benefits by reducing crime and encouraging people to engage in social activities, which would result in health benefits. Considering safety during design would support tourism, the economy, and the night-time economy, and protect vulnerable groups from disproportionate impacts. Design objectives would be met through the promotion of high quality design of infrastructure and housing to design out crime, which increases safety and perceptions of safety. Deprived areas would be improved as existing housing and neighbourhoods are improved.

### **Resource efficiency**

This option focuses on innovation and a circular economy model to reduce water and promote strong resource management. This option would result in economic benefits, particularly in the long term. Material and waste policies would be positively impacted as waste is minimised and resources become more sustainably managed. Co-ordination between infrastructure providers would possibly increase, resulting in positive infrastructure impacts. Environmental benefits include increased recycling and protection of natural assets, which would improve air quality, however the increased transportation of materials would result in increased emissions.

## Preferred option

The preferred option combines aspects of all the considered options and aims to increase London's efficiency and resilience in terms of environmental and safety threats by improving energy efficiency, targeting a low carbon circular economy, and promoting good design of buildings and infrastructure. Climate change resilience would be improved by managing flood risk and excessive heat. Safety would be improved by ensuring good design of buildings and infrastructure to resist fire and terrorism. The approach to efficiency and resilience should encourage public, private, community and voluntary sectors to work collaboratively. This option prioritises the safety and security of communities, and aims to reduce crime to protect vulnerable groups and encourage community cohesion. The economic benefits of this option result from the resilience to climate change in the short and medium term.

## Developing and assessing emerging policies

Once preferred strategic policies were identified, the development of specific London Plan policies was undertaken in conjunction with continual IIA. As part of an iterative process, draft policies were assessed using the IIA framework with feedback provided to the plan preparation team. This was undertaken on a need basis, with some policies requiring further iterations than others, until a preferred suite of policies had been developed.

A full assessment of the impacts associated with each of the policies is included in the IIA report, but a summary of the policies within defined chapters of the London Plan is provided below.

## Spatial Development Pattern

This chapter sets out the areas of growth and change within London based on the historic and existing pattern of development across London and the Wider South East, the public transport system, planned investment in strategic infrastructure, London's economic geography, areas that suffer from deprivation, and co-ordinated opportunities for significant new development. The management of town centres is addressed over a number of policies to promote their vitality and vibrancy. This chapter identifies the future management of the Central Activities Zone, the centre of London's economy, and outlines potential areas for development, known as Opportunity Areas, which can deliver a large proportion of London's need for new housing and drive economic growth. This chapter identifies collaboration arrangements between London and the Wider South East to deliver growth and prosperity across the region. Supporting the broad contents of this chapter is a Policy covering regeneration at strategic and local levels.

This chapter also supports the delivery of vital infrastructure across London and the Wider South East, ensuring that land is used appropriately and sustainably to help to deliver mutual benefits. This would promote growth in the regional economy, increasing the provision of space for new businesses and industries and building on the existing and growing industrial sectors and specialisms in different parts of London and the Wider South East. This would also facilitate improvements to transport links to ensure that London remains accessible for business and homes in the Wider South East, supporting mutual economic benefit for both London and the Wider South East and promoting growth in well-connected sustainable locations.

This chapter promotes the continued growth of the Central Activities Zone and protection of its unique agglomeration of functions, many of which are of international and national significance, bringing economic prosperity and investment to London and providing places and experiences that are central to the identity of London and many Londoners. The chapter also promotes growth and diversification across London's town centre network, bringing economic prosperity to local areas across London, supporting the vibrancy and vitality of London's town centres, and providing access to a wide variety of services, goods, and employment opportunities by sustainable modes of transport for more people, especially those who are less mobile or cannot travel far. Local growth would also facilitate the delivery of vital supporting infrastructure and services for local communities, such as schools, shops and community centres, and promote socialisation and integration.

Large scale Opportunity Areas and growth in town centres can provide space for a significant number of new homes. Large scale developments make up a large proportion of London's housing stock, but are often long-term projects. Smaller town centre developments would distribute new homes more widely, promote development in sustainable, well-connected locations, and facilitate some development at a faster rate, whilst also supporting smaller construction businesses. The provision of new homes will support town centre diversity, vitality and vibrancy, and offers a variety of social and wellbeing benefits, increasing the availability of affordable homes which conform to high standards and quality.

Specifically targeting the most deprived parts of the city and identifying local and strategic areas for regeneration would help to manage key issues, such as employment, isolation, poverty and education. It can also improve the look and feel of an area, which could contribute to reducing crime levels and increase the sense of welcome and belonging for local communities.

## Design

This chapter sets out the design requirements for developments in London including of housing, commercial and public buildings and spaces. Specific aspects of design are covered, including safety, security, inclusivity and quality. Issues such as noise, basement developments and housing standards are also discussed.

This chapter promotes the delivery of important physical infrastructure across London which supports the needs of residents, businesses and tourists. It encourages the sustainable use of land and high density developments to make the most of London's limited space. It also provides important standards for housing, covering the appropriate size and layout of homes, supporting wider issues such as overcrowding.

This chapter supports inclusive design in buildings, homes and the public realm to ensure people can move around the city easily and access the wider opportunities the capital has to offer. This is a particularly important issue for individuals with mobility issues who may be limited by poor design.

Across this chapter, many policies ensure the protection of green and open spaces, positively supporting long-term environmental objectives. Reducing and mitigating noise from a variety of sources is also addressed. This closely aligns with many policies throughout this chapter and the wider Plan which could require noise management. This chapter does also facilitate the protection of existing noise-generating businesses, such as pubs and music venues, by requiring developers to provide noise management.

Throughout this chapter there is underlying support for wider economic growth and prosperity by delivering important infrastructure which is accessible and of a high standard. Protecting existing businesses which are noise generating also helps the development of London's night-time economy.

This chapter covers a variety of safety and security issues within London to build resilience and make people feel safe visiting, working and living in the city. It promotes ways in which London can withstand the threat of hazards such as fires, flooding, extreme weather, terrorism and crime, helping London to remain a vibrant and attractive city.

## Housing

This chapter addresses the delivery of housing based on affordability and need, delivering sufficient housing stock in reasonable timescales, and ensuring that land is used efficiently in the development of housing.

A number of policies within this chapter focus on delivering housing based on need, for example student accommodation and sites for the travelling community, and specialist older people's housing. This has positive social benefits to ensure that appropriate accommodation is available for those who need it, and by ensuring housing is affordable and people are not priced out of London.

Policies referring to delivery of the appropriate number of houses do so by referring to understanding the current and future housing situation and promoting efficient use of land. Monitoring of current housing stock is essential to provide accurate information on housing supply and demand. Efficient use of land is supported through different approaches supporting developers on small and large sites respectively.

Policies promote efficient use of land by unlocking land earmarked for future development but that is currently not in use. This helps to address immediate issues of homelessness and overcrowding. The provision of long term affordable housing aims to permanently reduce homelessness and overcrowding, as well as providing housing based on need. Genuine affordable housing can provide more security of tenure and therefore a more stable community which can help to develop a 'sense of place' within the wider community and allow individuals to access education and employment opportunities.

Policies further advocate for efficient use of land and urban regeneration by focusing on replacing like for like housing in estate renewal schemes.

## Social Infrastructure

This chapter covers a broad range of health and social issues in London. It includes policies which aim to assess and meet the needs for social infrastructure including health, community, education, childcare, play and recreational facilities, as well as addressing the provision of public toilets and burial space.

This chapter promotes the protection and delivery of important community services and infrastructure, including health and social care facilities and community centres, to improve health, health inequalities and general wellbeing. It supports a targeted approach to infrastructure delivery, identifying where demand is and delivering health and social care where it is most needed.

By ensuring social infrastructure is accessible by public transport and foot/cycle paths, to encourage walking or cycling, these policies will help improve wider accessibility to facilities and services. The

sharing of spaces and co-location of facilities can also make these places more affordable, particularly for low-income groups who may have difficulty accessing these opportunities.

London is recognised for high-quality educational facilities, which the policies in this chapter seek to protect and enhance. Education and childcare can play an important role in improving health and wellbeing and reducing levels of crime and anti-social behaviour. It also facilitates greater resilience in the economy, providing a skilled workforce for the future economy.

A number of policies aim to reduce exposure to poor air quality to reduce associated health risks, particularly in children and young people. Methods include positioning schools and playgrounds away from busy roads. Safety is also an important consideration, particularly for children, promoting safe routes to school away from busy roads and delivering play spaces which feel safe.

There are policy requirements for a range of public toilets to be provided in certain development proposals. It ensures these facilities suit a range of users, including disabled persons toilets, family facilities, baby change facilities, gender-neutral toilets and Changing Places toilets.

There is an underlying support for health improvements across this chapter, particularly in children and young people. The provision of, and access to, play space and recreational facilities would help increase exercise levels, encouraging healthier and active lifestyles from an early age. This chapter also supports the direct provision of health services, but also aspects such as education and community centres, which can indirectly improve wellbeing.

This chapter also includes a Burial space policy which addresses the provision of burial spaces, consider all faith and religious requirements across London.

## Economy

This chapter contains 11 policies which focus on the protection, support, and enhancement of London's businesses, economic sectors, employment, skills, retail and visitor infrastructure. Within the chapter there is a clear focus on economic prosperity for all, and strategies to promote sustainable, equably-distributed economic growth and reduce economic inequality are presented.

The policies within the chapter seek to address social exclusion and socio-economic inequalities through supporting initiatives that promote access to training, skills and employment opportunities. This is across diverse sectors at a range of geographic scales for all Londoners and in all demographic groups. It promotes collaboration between boroughs to enhance opportunities for skills and employment.

The chapter also addresses London's need for business premises, supporting the provision of offices, retail premises and other workspaces for a variety of different business types and sizes. Policies promote the provision and protection of more affordable workspace and premises for sectors with social and cultural value. This would benefit firms of all different sizes and development stages, reduce inequality and exclusion for those who require more affordable rents, and provide employment opportunities for a wide variety of Londoners.

Further policies focus on the maintenance of sufficient land supply for industrial and related functions, sustainably meeting the growth demands of future business development. Maintaining and supporting

London's industrial capacity also supports a wide variety of employment opportunities and business types and sizes across different parts of London.

The chapter seeks to enhance employment opportunities for Londoners and the availability of suitable workspaces across a diverse range of sectors. Policies within the chapter will reduce socio-economic inequalities through supporting employment opportunities for people from all backgrounds and encouraging increased diversity across all sectors. This will also enhance health and wellbeing through reduced social exclusion.

London's visitor economy is supported through policies within the chapter. Policies focus on strengthening the visitor economy and associated employment through improving attractions, access, infrastructure, and visitor experience. The policies also support a sufficient supply of visitor accommodation in inner and outer London areas. This would present positive impacts due to the creation of jobs, and in turn enhance economic competitiveness.

## Heritage and Culture

This chapter contains seven key heritage policies which aim to support the protection, preservation and management of heritage assets and sites within London. The chapter outlines policies to ensure that London's historic environment is not only protected, but integrated seamlessly in regenerative projects and developments. This will safeguard London's rich cultural value, and importantly, help to maintain London's position as a leading Global City.

This chapter incorporates multiple aspects of heritage management, including, but not limited to, the aesthetics of heritage sites; the unique and intrinsic social and cultural value of heritage sites; conservation and protective of world heritage sites; and the effective management of London's strategic views.

The chapter also focus on the need to support the growth of London's diverse creative industries through the protection of their cultural venues and facilities. This ensures cultural facilities, where sustainably managed, are not lost to new development. The chapter also outlines community stakeholder engagement to identify focal points for local regeneration; benefitting the local economy and the creativity industry within the area.

The policies within the Heritage and Culture chapter seek to benefit the London and Greater London area through the creation of attractive, mixed use neighbourhoods to enhance the existing sense of place, and encourage community integration. Such developments will also reduce the need to travel by motorised transport. The implications of the policies pose great benefit to residents and visitors with mobility and access issues, and to disadvantaged groups within society.

Within this chapter a number of policies are likely to help minimise noise, vibration levels and disruption to people and communities over the immediate and longer term; reducing stress and thereby enhancing health and wellbeing within the community. However, the support of the evening and night time economy and the protection of public houses present significantly negative short and medium term impacts to noise levels. The London Plan must effectively address this through related policies which address noise management.

## Green infrastructure and natural environment

This contains nine key policies which focus on the protection of London's green environment supporting the Mayor's long-term target of making London greener. The sites mentioned within this chapter include woodland, green belt, green corridors, Metropolitan Open Land, and Sites of Importance for Nature Conservation (SINCs). Strategies to make London greener include the protection and creation of green and open spaces to make London at least 50% green by 2050; enhancing tree cover by 10% by 2050; and supporting development that increases green infrastructure.

The chapter outlines the need for the protection and improvement of greener spaces in London. This will benefit the community through contributing to the development of attractive, mixed-use neighbourhoods with high aesthetic and use value. Attractive, mixed-use neighbourhoods will play a key role in enhancing community vibrancy, mental and physical health and wellbeing, and will help to encourage community integration between all demographic and socio-economic groups.

It outlines plans to increase connectivity and accessibility to, from, and within London through the creation of safe, and pedestrian-friendly routes. This would increase security and safety in the communities, and thereby improve mental health and wellbeing.

The introduction of trees, green sites, and green infrastructure will help to enhance climate-resilience by mitigating against flood, drought and heat risks. Green strategies such as green roofs and high-quality landscaping will also benefit the London environment through air quality improvements. This will occur due to a reduction in harmful emissions as a result of carbon sequestration and reduced vehicular transport. Air quality improvements will enhance health and wellbeing through reduced poor health, particularly for vulnerable groups.

The protection of the green belt and Metropolitan Open Land will benefit London's unique natural capital and biodiversity. Green sites will create stable environments for species, and corridors for migration where necessary. This will allow species to prosper through habitat creation, landscape preservation, and greater infrastructural resilience to flooding.

## Sustainable Infrastructure

This chapter sets out policies for a broad range of infrastructure types and requirements. These policies are diverse and relate to sustainable construction, energy, water, flooding, waste and digital infrastructure

The policies include, but are not limited to, improving air quality, the attainment of zero carbon development, the identification of current and future energy requirements, and waste reduction and efficiency strategies. Policies also extend to focus on hydraulic fracturing, climate-resilience, the encouragement of greater digital infrastructure and connectivity and physical infrastructure including passenger transport piers and waterways.

The chapter encourages greater digital connectivity to support London's global competitiveness now and in the future through the appropriate provision of digital infrastructure in developments and public realm design. This is beneficial for developments and their surrounding areas as it supports the extension and enhancement of mobile digital infrastructure to enable modern methods of working and communication.

Air quality is also a key area of focus within the chapter, with policies seeking to reduce the impacts of poor air quality, especially for vulnerable people. It is outlined that all developments should achieve either Air Quality Positive or Neutral outcomes. This would benefit the health and wellbeing of the population, particularly young people, the elderly, and those with existing health conditions, which could bring economic benefits through reduced healthcare costs.

The policies also aim to improve London's climate-resilience through requiring new major developments to be zero carbon, and by addressing the risk of overheating and flooding. These present positive impacts for the natural and built environment, through reducing energy consumption, enhancing air quality, and mitigating against heat and flood risks.

Policies which encourage the improvement of water transport may potentially pose a threat to London's natural capital, and this should be effectively analysed and managed to reduce threats to habitats, species, and landscapes.

## Transport

This chapter contains 14 policies, outlining quantitative and qualitative targets for transport development within London. The policies relate to current and future transportation challenges for road, aviation, and rail. This includes, but is not limited to, sustainability, capacity and connectivity, Healthy Streets, active transport, disability access, car parking, and the movement of freight.

The Transport chapter supports the transition to sustainable transport and sets a target of 80% of all London trips to be made on foot, bicycle, or via public transport by 2041. This would encourage more accessible and attractive transport routes, and the development of Healthy Streets through reduced vehicular transport. As a result, air quality will improve through reduced private car use; and tangible benefits in health and wellbeing will become evident through increased levels of exercise and access to green spaces. Noise disturbance from vehicles will also reduce, further improving health and wellbeing for Londoners.

The focus on parking within the chapter is multi-faceted and includes cycle and car parking in residential, office, retail, hotel, and non-residential disabled parking settings. The policies outline a reduction in parking to encourage more sustainable forms of transportation. The impacts of the parking policies are positive and help to tackle climate change and air quality associated risks through reducing greenhouse gas related emissions. The reduction of private vehicle provisions in retail and residential areas however may negatively impact upon accessibility for vulnerable and disabled groups. Notably, the London Plan must develop strategies to combine parking policies with public transport policies that enhance and develop connectivity and accessibility infrastructural routes within London. Here, marginalised groups, such as disabled and elderly groups should be adequately accounted for.

Freight transportation and service is also considered within the Transport chapter. The chapter focuses on sustainable freight movement in London through the promotion of deliveries at different times of the

day and night to reduce the impact on road congestion, air quality, and conflict with other road users. The increased efficiency and sustainability of freight movement would encourage organisational efficiency, allowing businesses to prosper. Many freight services also employ lower skilled jobs and this would benefit the economic growth for all socio-economic groups within the community.

## Next Steps

This IIA Report is open for consultation alongside the draft London Plan. Upon completion of the consultation period, the consultation responses will be collated and analysed. The findings will be used in preparation of, and where appropriate revision of, the final London Plan.

A Post Adoption Statement is a requirement under the SEA Regulations and is published after the Mayor publishes the final version of the London Plan. This statement outlines how the IIA has influenced the drafting of the London Plan and will set out how the consultation responses were addressed in finalising the London Plan. The Statement will meet the requirements of the SEA Regulations, but will also reflect the wider scope of the assessment in respect of its coverage of sustainability.

Any comments relating to the findings of the IIA presented in this report please email to [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk) or send written comments by 2 March 2018 to:

Integrated Impact Assessment  
Greater London Authority  
The London Plan Team  
City Hall  
Post Point 18  
FREEPOST RTJC-XBZZ-GJKZ  
London SE1 2AA



## Contents page

<b>1</b>	<b>Introduction</b>	<b>1</b>	5.18	Natural environment and natural capital	23	
	1.1	Integrated impact assessment	1	5.19	Historic environment	24
	1.2	Structure of the IIA Report	3	5.20	Geology and soils	24
<b>2</b>	<b>The Draft London Plan</b>	<b>5</b>	5.21	Material and waste	25	
	2.1	Context	5	5.22	Noise and vibration	25
	2.2	Growth Challenges	5	<b>6</b>	<b>Key sustainability issues</b>	<b>26</b>
	2.3	Policy Levers	6	<b>7</b>	<b>IIA Framework</b>	<b>29</b>
	2.4	Strategic options	6	7.1	Establishing the IIA Framework	29
	2.5	Draft London Plan Policies	9	7.2	Assessing the London Plan	34
<b>3</b>	<b>IIA methodology and approach</b>	<b>12</b>	<b>8</b>	<b>Appraisal of strategic options</b>	<b>35</b>	
	3.1	Stages of the IIA process	12	8.1	GG1 Building strong and inclusive communities	35
	3.2	IIA Scope	13	8.2	GG2 Making the best use of land	43
	3.3	Temporal scope	13	8.3	GG3 Creating a Healthy City	53
	3.4	How the IIA influenced the Draft London Plan	14	8.4	GG4 Delivering the homes Londoners need	61
<b>4</b>	<b>Review of relevant plans, programmes, strategies and objectives</b>	<b>15</b>	8.5	GG5 Growing a good economy	71	
	4.1	Introduction	15	8.6	GG6 Increasing efficiency and improving resilience	81
	4.2	Document review for London	15	<b>9</b>	<b>Assessment of the London Plan policies</b>	<b>91</b>
<b>5</b>	<b>Baseline information</b>	<b>18</b>	9.1	Spatial development patterns	91	
	5.1	Scope and purpose of the baseline	18	9.2	Design	111
	5.2	Demographic change	18	9.3	Housing	137
	5.3	Social integration and inclusion	18	9.4	Social Infrastructure	173
	5.4	Health and health inequalities	18	9.5	Economy	187
	5.5	Crime, safety and security	18	9.6	Heritage and Culture	209
	5.6	Housing	19	9.7	Green infrastructure and natural environment	223
	5.7	Sustainable land use	20	9.8	Sustainable Infrastructure	241
	5.8	Connectivity and accessibility	20	9.9	Transport	275
	5.9	Economic competitiveness	21	9.10	Funding the London Plan	303
	5.10	Employment	21	<b>10</b>	<b>Next Steps</b>	<b>305</b>
	5.11	Education and skills	21	<b>Tables</b>		
	5.12	Culture	22	Table 1: Legal Requirements		
	5.13	Air quality	22	Table 2: Key socio-economic drivers of Growth for London		
	5.14	Climate change	22	Table 3: Strategic policy options for strong and inclusive communities.		
	5.15	Energy use and supply	22	Table 4: Strategic policy options for best use of land.		
	5.16	Water resource and quality	22	Table 5: Strategic policy options for creating a healthy city.		
	5.17	Flood risk	23			

Table 6: Strategic policy options for delivering the homes Londoners need.

Table 7: Strategic policy options for growing a good economy.

Table 8: Strategic policy options for increasing efficiency and improving resilience.

Table 9: Relevant plans and programmes that inform the IIA process

Table 10: Additional relevant plans and programmes

Table 11: Quality of waterbodies in London

Table 12: Areas in London deficient in access to open space

Table 13: Number of people exposed to roadside and railway noise (2011)

Table 14: Key sustainability issues in London

Table 15: Link between SEA topics and IIA Objectives

Table 16: The IIA Framework – objectives and key guide questions

Table 17: Significance ratings and definitions

Table 18: GG1 Option 1: Infrastructure-led approach

Table 19: GG1 Option 2: Housing-led approach

Table 20: GG1 Option 3: Participation and citizen-led approach

Table 21: GG1 Building strong and inclusive communities

Table 22: GG2 Option 1: Current London Plan

Table 23: GG2: Sustainable Intensification

Table 24: GG2 Option 3: Polycentric approach

Table 25: GG2 Option 4: Current London Plan and Green belt release

Table 26: GG2 Option 5: Current London plan and city region approach

Table 27: GG3 Option 1: Prevention

Table 28: GG3 Option 2: Cure

Table 29: GG3 Option 3: Spatially-targeted approach

Table 30: GG3 Creating a healthy city

Table 31: GG4 Option 1: Temporary housing

Table 32: GG4 Option 2: Delivering against housing need

Table 33: GG4 Option 3: Leaving delivery to market forces

Table 34: GG4 Option 4: Affordable homes

Table 35: GG4 Delivering the homes London needs

Table 36: GG5 Option 1: Investment in infrastructure

Table 37: GG5 Option 2: Dispersed growth

Table 38: GG5 Option 3: Market forces

Table 39: GG5 Option 4: Affordable workspace

Table 40: GG5 Sharing London's growing economy

Table 41: GG6 Option 1: Climate change mitigation

Table 42: GG6 Option 2: Climate change adaptation

Table 43: GG6 Option 3: Safe designed city

Table 44: GG6 Option 4: Resource efficiency

Table 45: GG6 Increasing efficiency and improving resilience

Table 46: SD1 Opportunity Areas

Table 47: SD2 Collaboration in the Wider South-east and beyond

Table 48: SD3 Growth Areas in the Wider South-east and beyond

Table 49: SD4 The Central Activities Zones (CAZ)

Table 50: SD5 Offices, other strategic functions and residential development in CAZ

Table 51: SD6 Town centres-strategy

Table 52: SD7 Town centres-networks

Table 53: SD8 Town centre development principles and local plans

Table 54: SD9 Town centres local partnership and implementation

Table 55: SD10 Strategic and local regeneration

Table 56: D1 London's form and characteristics

Table 57: D2 Delivering good design

Table 58: D3 Inclusive design

Table 59: D4 Housing quality and standards

Table 60: D5 Accessible Housing

Table 61: D6 Optimising Housing Density

Table 62: D7 Public realm

**Table 63: D8 Tall Buildings**

Table 64: D9 Basement development

Table 65: D10 Safety, Security and Resilience

Table 66: D11 Fire safety

Table 67: D12 Agent of Change

Table 68: D13 Noise

Table 69: H1 Increasing housing supply

Table 70: H2 Small sites

Table 71: H3 Monitoring housing targets

Table 72: H4 Meanwhile use

Table 73: H5 Delivering affordable housing

Table 74: H6 Threshold approach to applications

Table 75: H7 Affordable housing tenure

Table 76: H8 Monitoring of affordable housing and review mechanisms

Table 77: H9 Vacant building credit

Table 78: H10 Redeveloping existing housing and estate regeneration

Table 79: H11 Ensuring the best use of stock

Table 80: H12 Housing type mix

Table 81: H13 Build to rent

Table 82: H14 Supported and specialised accommodation

Table 83: H15 Specialist older people's housing

Table 84: H16 Gypsy and Traveller accommodation

Table 85: H17 Purpose built student accommodation

Table 86: H18 Large-scale purpose-built shared living  
 Table 87: S1 Developing London's social infrastructure  
 Table 88: S2 Health and social care facilities  
 Table 89: S3 Education and children facilities  
 Table 90: S4 Play and informal activities  
 Table 91: S5 Sports and recreation  
 Table 92: S6 Public toilets  
 Table 93: S7 Burial Space  
 Table 94: E1 Offices  
 Table 95: E2 Low cost business space  
 Table 96: E3 Affordable workspace  
 Table 97: E4 Land for industry, logistics and services to support London's economic function  
 Table 98: E5 Strategic industrial locations (SIL)  
 Table 99: E6 Locally Significant Industrial Sites  
 Table 100: E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function  
 Table 101: E8 Sector growth opportunities and clusters  
 Table 102: E9 Retail, markets and hot food takeaways  
 Table 103: E10 Visitor infrastructure  
 Table 104: E11 Skills and opportunities for all  
 Table 105: HC1 Heritage conservation and growth  
 Table 106: HC2 World Heritage Sites  
 Table 107: HC3 Strategic and local views  
 Table 108: HC4 London's view management framework and strategic views  
 Table 109: HC5 Supporting London's creative and cultural industry  
 Table 110: HC6 Supporting the evening and night-time economy  
 Table 111: HC7 Protecting public houses  
 Table 112: G1 Green Infrastructure  
 Table 113: G2 London's Green Belt  
 Table 114: G3 Metropolitan Open Land  
 Table 115: G4 Local green and open space  
 Table 116: G5 Urban greening  
 Table 117: G6 Biodiversity and access to nature  
 Table 118: G7 Trees and woodlands  
 Table 119: G8 Healthy Food  
 Table 120: G9 Geodiversity  
 Table 121: SI1 Improving air quality  
 Table 122: SI2 Minimising greenhouse gas emissions  
 Table 123: SI3 Energy infrastructure  
 Table 124: SI4 Managing heat risk

Table 125: SI5 Water infrastructure  
 Table 126: S6 Digital Connectivity  
 Table 127: SI7 Reducing waste and supporting the circular economy  
 Table 128: SI8 Waste capacity and net waste self-sufficiency  
 Table 129: SI9 Safeguarded waste sites  
 Table 130: SI10 Aggregates  
 Table 131: SI8 Hydraulic fracturing  
 Table 132: SI12 Flood risk management  
 Table 133: SI13 Sustainable drainage  
 Table 134: SI14 Waterways- strategic role  
 Table 135: SI15 Water transport  
 Table 136: SI16 Waterways- use and enjoyment  
 Table 137: SI17 Protecting London's waterways  
 Table 138: T1 Strategic approach to transport  
 Table 139: T2 Healthy streets  
 Table 140: T3 Transport capacity, connectivity and safeguarding  
 Table 141: T4 Assessing and mitigating transport impacts  
 Table 142: T5 Cycle parking  
 Table 143: T6 Car parking  
 Table 144: T6.1 Residential parking  
 Table 145: T6.2 Office parking  
 Table 146: T6.3 Retail parking  
 Table 147: T6.4 Hotel parking  
 Table 148: T6.5 Non-residential disabled persons parking  
 Table 149: T7 Freight and servicing  
 Table 150: T8 Aviation  
 Table 151: T9 Funding transport infrastructure through planning  
 Table 152: DF1 Delivery of the plan and planning obligations

### Figures

Figure 1: Dhalgren and Whitehead social model of health (1991)  
 Figure 2: Geographic scope - London and the Wider South East  
 Figure 3: Geographic scope - London boroughs  
 Figure 4: Geographic scope - CAZ  
 Figure 5: London Plan and IIA iterative process  
 Figure 6: Vulnerability locality profile  
 Figure 7: Town centre network  
 Figure 8: Public Transport Access Level (PTAL) distribution  
 Figure 9: Flooding from multiple sources  
 Figure 10: Designated sites across London

Figure 11: Heritage assets across London

Figure 12: Strategic views in London

## Appendices

### Appendix A

Glossary of terms and list of abbreviations

### Appendix B

Extended Baseline Informatio

### Appendix C

Context Review

# 1 Introduction

The spatial development strategy for London ('the London Plan') coordinates the Mayor's integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. This provides an overarching framework for the 32 London Boroughs and City of London Corporation. Each authority must be able to demonstrate that their local plans are in general conformity with the policies of the London Plan. The Mayor has a duty to keep the London Plan under review to address changing trends and issues. The most recent update was in March 2016.

Following the 2016 mayoral election, a full review was planned for the adoption of a new London Plan in 2019.

The Integrated Impact Assessment (IIA) process has drawn together environmental, equality, health and community safety assessments to develop policies which meet the objectives of all four. The IIA is an integral part of the development and justification for the London Plan; the IIA tests the proposed options and policies of the emerging Plan and helps to maximise the benefits arising from policy implementation. The IIA aims to promote sustainable development through better integration of sustainability considerations into plan preparation and adoption.

## 1.1 Integrated impact assessment

The IIA process involves an assessment which follows the stages of the Strategic Environmental Assessment (SEA) methodology outlined in the Environmental Assessment of Plans and Programmes Regulations ('EAPP') 2004.

SEA guidance informs and structures the IIA components, drawing together the assessment streams to present a common and fully integrated assessment of the London Plan policies. The assessments forming the IIA of the London Plan are:

- Strategic Environmental Assessment;
- Equality Impact Assessment;
- Health Impact Assessment; and
- Community Safety Impact Assessment.

Drawing these together within an IIA contributes to a more balanced and inclusive assessment and better informed London Plan. An overview of the individual requirements and methodologies required for each of these assessments is presented below.

In addition to meeting the requirements of the IIA assessment, a Habitat Regulation Assessment (HRA) has also been prepared. This is required by the European Habitats Directive, enacted by Conservation (Natural Habitats and c) Regulations 1994 (The 'Habitats Regulations'). This assessment is required to consider whether there is likely to be any significant effects of the new London Plan on all European

protected sites. This assessment will consider the HRA implications for each London plan policy. The HRA will be published alongside this document and the draft London Plan for consultation.

### 1.1.1 Strategic Environmental Assessment (SEA)

The SEA Directive<sup>1</sup> requires the assessment of the likely significant environmental effects arising from a plan or programme. This requirement has been implemented in to domestic legislation in England and Wales through the Environmental Assessment of Plans and Programmes Regulations 2004.

SEA allows the London Plan to be tested as a whole and its individual objectives and policies against defined environmental topics, to identify significant effects. The SEA, as part of the IIA, assesses the environmental effects of the strategic options and states the reasons for selecting the preferred options. Where significant effects are predicted, the SEA also identifies the measures required to mitigate them and the indicators that will be used to monitor them once the new London Plan is adopted.

### 1.1.2 Equality Impact Assessment (EqIA)

EqIA is a tool to help meet legal duties to ensure that equality issues are fully considered as part of the decision-making process, by systematically identifying and assessing the potential effects arising from the design and implementation of a proposed plan, policy, or project for people sharing one or more protected characteristic. The Equality Act imposes a duty on public bodies to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means having regard in particular to the need to:
  - Remove or minimise disadvantages suffered by people who share a protected characteristic that are connected to that characteristic.
  - Take steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don't have that characteristic.
  - Encourage people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low.

and

- foster good relations between different people between persons who share a relevant protected characteristic and persons who do not share it. This means, having regard in particular to the need to:
  - tackle prejudice; and

<sup>1</sup> The SEA Directive (Directive 2001/42/EC) <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

- promote understanding.

The EqIA identifies the likely effects on discriminatory practices, the potential to alter the opportunities of certain groups of people, and/or effect on relationships between different groups of people which could arise as a result of the proposed new policies. The Equality Act identifies the following as “protected characteristics”:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

Although low-income groups are not identified within the ‘Protected Characteristics’ under the Equality Act (2010), they have been included as part of this assessment because low-income and deprivation typically overlap with other equalities characteristics, and form relevant considerations in the context of achieving inclusive growth. Similarly, working patterns have been included within the identified equalities groups, to ensure that adequate consideration is made for residents undertaking shift work, including night shifts. This type of working can disproportionately be undertaken by low-income communities, and forms part of the wider equalities assessment.

In line with the statutory requirements of the Equality Act (2010), the IIA has given due regard to the need to remove or minimise disadvantages, discourage discriminatory practices and proactively accommodate the needs of equalities groups. This has been carried out by identification of sensitive receptors, who may be disproportionately impacted as a result of policy implementation, along with recommending how Policies could be strengthened to promote equitable opportunities. The key guide questions serve to assess the multiple dimensions of inequality, disadvantage and discrimination, and ensure Policies are promoting inclusive, accessible and equitable opportunities across higher risk groups.

EqIA is two-stage process:

- **Stage 1, Screening:** the impacts of the proposed new policies are assessed against a defined set of protected characteristics. If no negative effects are identified during screening, no further assessment is required. If there are effect that cannot easily be mitigated, a full EqIA will be undertaken.
- **Stage 2, full EqIA:** an in-depth assessment of the impacts of any policies which cannot be mitigated, the recommendation of mitigation measures, definition of monitoring, and evaluation measures and public consultation.

<sup>2</sup> [www.healthyurbandevelopment.nhs.uk](http://www.healthyurbandevelopment.nhs.uk)

<sup>3</sup> <https://www.gov.uk/government/publications/health-impact-assessment-tools>

### 1.1.3 Health impact assessment (HIA)

There is currently no statutory guidance for how to undertake an HIA. The scope, approach and methodology are driven by a range of factors including non-statutory guidance and best practice, stakeholder interests, and site or project or plan-specific issues.

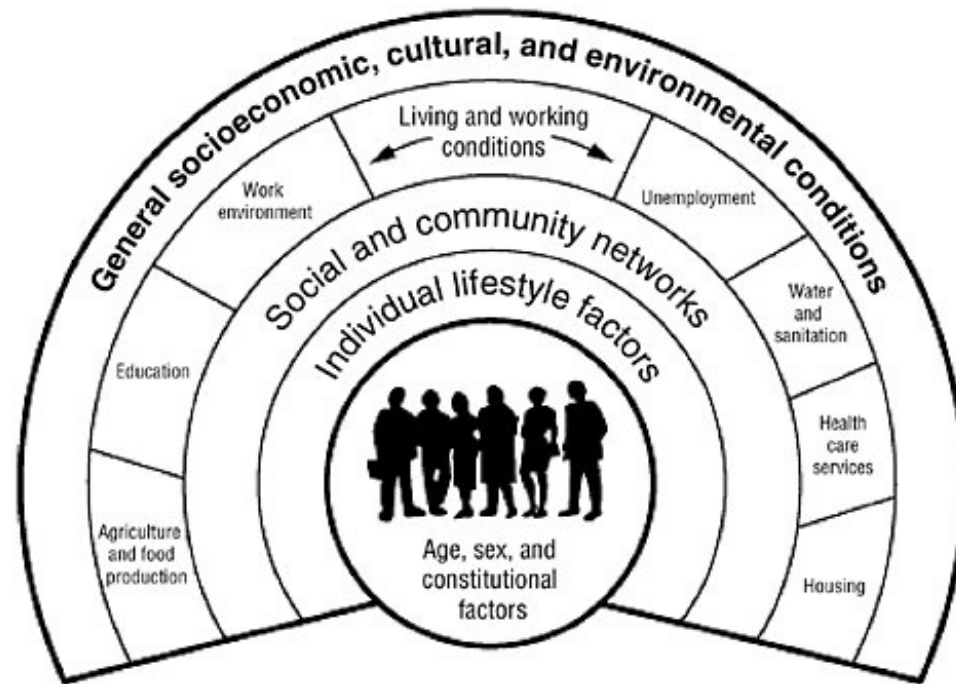
The overarching aim of HIA is to ensure that plans and policies minimise negative impacts and maximise positive health impacts. The approach to the health element of the IIA has been based on appropriate guidance and health assessment tools, including:

- The London Healthy Urban Development Unit (HUDU)<sup>2</sup> Rapid Health Impact Assessment Matrix. This sets out a framework for evaluating projects, plans and policies under 11 broad topic or determinant headings;
- The HUDU Healthy Urban Planning Checklist which provides a checklist designed so wellbeing implications of local plans and major planning applications are taken into account. It includes four themes: health and housing, active travel, healthy environment and vibrant neighbourhoods; and
- Department of Health’s Health Impact Assessment Tools<sup>3</sup>. This includes the following screening questions to assist in considering potential health effects:
  - Will the proposal have an impact on health, mental health and wellbeing?
  - Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
  - Will the proposal affect an individual’s ability to improve their own health and wellbeing?
  - Will there be a change in demand for, or access to, health and social care services?
  - Will the proposal have an impact on global health (either directly or indirectly)?

The Dahlgren and Whitehead model<sup>4</sup> (Figure 1) illustrates the determinants of health, ranging from individual characteristics and lifestyles to wider economic, cultural, social and environmental conditions.

<sup>4</sup> Dahlgren G, Whitehead M. (1991) Policies and Strategies to Promote Social Equity in Health. Stockholm, Sweden: Institute for Futures Studies.

Figure 1: Dhalgren and Whitehead social model of health (1991)



### 1.1.4 Community safety impact assessment

The Crime and Disorder Act 1998 (as amended) and Police and Justice Act 2006 place a duty on the Mayor to consider community safety.

During the scoping stage, crime and disorder aspects associated with the London Plan were identified, including:

- baseline crime and nuisance statistics, with which impacts associated with options and policies can be assessed;
- the types of crime associated with the overarching strategies including environment, infrastructure, housing, and transport in London; and
- developing the crime and disorder aspects of the IIA objectives.

## 1.2 Structure of the IIA Report

The legal requirements for IIA are stipulated by the Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA); Section 149 of the Equalities Act 2010 (EqIA); and the Crime and Disorder Act 1998 (CSIA). Table 1 sets out the particular requirements from each of these legislation requirements and how they are met within the IIA report.

Table 1: Legal Requirements

Requirements of the SEA Regulations (Schedule 2)	Relevant section of this IIA Report
(a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes (article 5)	Section 4 Appendix C
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programmes;	Section 5 Appendix B
(c) The environmental characteristics of areas likely to be significantly affected	Section 6
(d) Existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 5 Appendix B
(e) The environmental protection objectives, established at international, community or member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 5 Appendix B
(f) The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 8 Section 9
(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 8 Section 9
(h) An outline of the reasons for selecting alternatives dealt with and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 8 Section 9
(i) A description of the measures envisaged concerning monitoring	Section 8 Section 9
(j) A non-technical summary of the information provided under the above headings	NTS precedes report
Requirements of the Equalities Act 2010 (Part II, Ch1, Section 149)	Relevant section of this IIA Report
(1) A public authority must, in the exercise of its functions, have due regard to the need to— (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.	Section 4 Appendix B Section 8 Section 9
(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to— (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.	

<p>(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.</p> <p>(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—</p> <p>(a) tackle prejudice, and</p> <p>(b) promote understanding.</p>	
<p><b>Requirements of the Crime and Disorder Act 1998 (as amended) (Section 17)</b></p>	<p><b>Relevant section of this IIA Report</b></p>
<p>Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,</p> <p>(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and</p> <p>(b) the misuse of drugs, alcohol and other substances in its area; and</p> <p>(c) re-offending in its area</p>	<p>Section 4 Appendix A Section 8 Section 9</p>

The remainder of this IIA report is as follows:

### **Chapter 2 The Draft London Plan**

A description of the policy drivers of the London Plan and how the strategic options and specific policies of the Draft London Plan were developed.

### **Chapter 3 The IIA assessment methodology and approach**

A description of the methodology used for the IIA and how the assessment was undertaken.

### **Chapter 4 Context review**

A presentation of the plans, programmes and strategies reviewed to provide context for the IIA. The detailed review of these is contained in Appendix A.

### **Chapter 5 Baseline information**

A description of the current environmental, economic and social baseline of London.

### **Chapter 6 Key sustainability issues**

A summary of the key sustainability issues identified from the context review and baseline information that should be addressed by the London Plan and should be considered as part of IIA objectives

### **Chapter 7 IIA Framework**

A presentation of the objectives and key supporting questions used for the IIA, including how they have been developed.

### **Chapter 8 Appraisal of options**

The appraisal undertaken of the high level strategic options that have shaped the Draft London Plan's cross cutting strategic policies (and therefore the subsequent development of specific policies).

### **Chapter 9 Assessment of the London Plan Policies**

A presentation of the assessment of individual draft policies, including an assessment of the likely effects of the policies and how the IIA has influenced the GLA in developing these policies.

### **Chapter 10 Next Steps**

A brief explanation of the next stages of the IIA process and contact details for commenting on the IIA.



## 2 The Draft London Plan

### 2.1 Context

The London Plan outlines the parameters for London's growth, including homes and job numbers, housing delivery targets for boroughs, and a range of strategic policies – with which the boroughs' Local Plan policies must be in general conformity.

The latest London Plan was published in March 2016 and is a consolidated version based on the 2011 Plan, including three minor alterations (Revised Early Minor Alterations 2013, Further Alterations 2015 and Minor Alterations 2016).

After his election in May 2016, the Mayor of London Sadiq Khan announced that a full review of the London Plan will be undertaken leading to the adoption of a new plan in 2019.

As part of this early stage in the review, the Mayor formally published 'A City for All Londoners' document in October 2016, which sets out his direction of intent for all his strategies, including the London Plan, providing an opportunity for early engagement in the development of all his strategies. Within this direction of travel document the Mayor has set out a vision for good growth:

*"To build a London where no community feels left behind and where everyone has the opportunities they need to fulfil their potential*

*To accommodate as much growth as possible within London – protecting land for employment across London but particularly in the centre and intensifying housing developing around stations and well-connected town centres so that people can live in convenient locations.*

*Ensure that people can access decent and affordable housing, jobs, culture and social infrastructure across the city, that methods of transport keep pace with the number of people needing to travel, and that the environment is protected and enhanced – in a bold and positive response to unprecedented growth pressures.*

*Bring forward more housing on Transport for London (TfL) and other public-sector land. Help the development industry to do more – and, importantly, offer a variety of affordable housing types – low-cost rented, the London Living Rent and shared ownership – working towards a target of 50 per cent of new homes in the capital being affordable.*

*Preserve and enhance London's global competitiveness on all fronts – delivering world-class transport infrastructure, arguing for an immigration system that prioritises access to talent, and protecting our environment and our world-class culture so that people and businesses from around the world continue to choose London.*

*Increase opportunities for all Londoners – from different backgrounds and of all ages - to ensure that everyone benefits from the capital's economic success.*

*Promote economic activity across London, day and night, and take account of the particular needs of small businesses operating in the capital.*

*Protect and enhance the environment - including the Green Belt. Bring air quality back down to safe levels as soon as possible, and by 2050 London to be zero carbon – which can be achieved in part by introducing measures for cleaner, more efficient energy production and use.*

*The city to be green, healthy and more attractive - reducing traffic and encouraging cycling and walking on 'Healthy Streets'.*

*Protect the city's heritage and culture and promote good design in public spaces to improve everyone's quality of life.*

*To be a stronger, more cohesive and social integrated city by addressing inequalities, tackling disadvantage and discrimination and promoting full participation in the life of the city. Making sure that in every area of policy, they are given the resources they need to make London a more equal city.*

*Redefining the priorities of the Met Police to bring policing closer to communities; to protect young people, particularly from the dangers of knife crime; to confront violence against women and girls; to combat hate crime, extremism and terrorism; and to improve the criminal justice system so that it really works for all Londoners."*

The vision and objectives for the London Plan will derive from those in the 'A City for All Londoners' document, as set out above.

### 2.2 Growth Challenges

Table 2 below sets out the key drivers of growth that the new London Plan has had to consider during the plan preparation stage.

Table 2: Key socio-economic drivers of Growth for London<sup>5</sup>

Economic and demographic growth parameters to 2041 for the new London Plan	
Population	<ul style="list-style-type: none"> <li>8.7 million people at 2015</li> <li>2016 London Plan: projected growth of 76,000 people per year to 2036</li> <li>latest projections: projected growth of 72,000 people per year to 2041</li> </ul>
Households	<ul style="list-style-type: none"> <li>million households at 2014</li> <li>2016 London Plan: projected growth of 40,000 households per year to 2036</li> <li>latest projections: projected growth of 46,000 households per year to 2041</li> </ul>
Housing Need and Capacity	<ul style="list-style-type: none"> <li>2017 assessed need of 66,000 homes per year to 2041</li> </ul>
Housing Capacity	<ul style="list-style-type: none"> <li>2017 SMHA borough annual housing targets set at 65,000 homes</li> </ul>

<sup>5</sup> GLA (2017) The London Plan: Integrated Impact Assessment Scoping Report

Economic and demographic growth parameters to 2041 for the new London Plan	
	<ul style="list-style-type: none"> <li>Housing pipeline of 260,000 (planning approvals)</li> <li>Annual completions averaging only c25,000 per year although recent completions increased to 34,000</li> </ul>
Employment	<ul style="list-style-type: none"> <li>5.6 million jobs at 2015</li> <li>2016 London Plan: projected growth of 32,000 jobs per year to 2036</li> <li>latest projections: projected growth of 46,000 jobs per year to 2041</li> </ul>

## 2.3 Policy Levers

The growth challenges described above can be tackled by applying different policy levers, various combinations of which will result in different spatial patterns of development for London (the spatial options). Some of these have been explored in outer London Commission reports, commissioned by the previous Mayor, as well as joint work with TfL on options for transport infrastructure and through independent studies.

These include (noting many of these may overlap):

- focusing growth in CAZ/Isle of Dogs, opportunity and intensification areas, housing zones, the higher order town centres, Strategic Outer London Development Centres and locations well served by public transport, together with selective release of industrial land for housing. Note that this is the approach favoured by the current Plan.
- promoting higher levels of growth in the above locations, recognising transport capacity constraints
- housing density uplift
- estate renewal
- better use of public landholdings
- marginal industrial/brownfield land release – but not to the extent that London’s core industrial base is compromised
- suburban intensification
- station intensification zones/areas
- growth corridors in and extending beyond London (pulls all the above together but with a particular focus on strategic transport infrastructure (eg CrossRail1, High Speed 2, CrossRail2))
- improved efficiency – making better use of existing housing stock and the pipeline of approvals,
- metroisation (more frequent services on existing lines),
- addressing barriers to housing delivery
- green belt review/selective green belt release
- Duty to Cooperate agreements with authorities outside London to take an element of London’s growth (housing and/or industry)

## 2.4 Strategic options

A key component of both plan development and the IIA process is the development and assessment of strategic options that shape policy development. The plan preparation and IIA process identified a range of options associated with the key ‘cross-cutting policies’ that were being developed to underpin specific plan policies. These cross cutting policies aim to provide a strategic direction for tackling problems facing London in a holistic and robust manner and are termed Good Growth policies within the draft London Plan.

These cross cutting policies for which strategic options have been developed address the following:

- Building strong and inclusive communities;
- Making the best use of land;
- Creating a healthy city with reduced health inequalities;
- Delivering the homes Londoners need;
- Growing a good economy; and
- Increasing efficiency and improving resilience.

The assessment of these spatial development options is presented in Section 8 of this IIA report.

### 2.4.1 Building strong and inclusive communities

London is a large conurbation, and as a result is made up of a number of diverse communities, which in turn are based upon a broad range of socio-economic groups, based on ethnicity, wealth, education and employment characteristics. This range of socio-economic factors is important to the establishment and success of community cohesion that benefits everybody.

There are a number of barriers to achieving this most notably barriers to wealth, inequalities in health that is perpetuated by the dominance of transport infrastructure and social mobility issues associated with living and working in London, particularly through different generations.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following three social inclusion options were developed for consideration. These options represent different methods by which to implement social inclusion strategies, and are presented below.

Table 3: Strategic policy options for strong and inclusive communities.

Option	Description
1. Infrastructure-led approach	<ul style="list-style-type: none"> <li>Housing is left to market forces.</li> <li>Focus on Healthy Streets, digital connectivity, etc.</li> <li>Inclusive accessibility</li> <li>Physical infrastructure, green infrastructure and social infrastructure</li> </ul>
2. Housing-led approach	<ul style="list-style-type: none"> <li>Target 50% affordable housing</li> <li>Promotion of various types of housing (including co-living, student accommodation)</li> </ul>

Option	Description
3. Participation and citizenship-led approach	<ul style="list-style-type: none"> <li>• Allowing for and facilitating community-orientated developments</li> <li>• Promotion of neighbourhood planning and capacity building</li> <li>• Retention and promotion of community assets (cultural heritage, social infrastructure etc.)</li> </ul>

### 2.4.2 Making the best use of land

As part of the developing the new London Plan, high level spatial development options have been tested to assess strategic land use alternatives for London.

The options to be considered envisage that the new London Plan will strongly support economic growth, recognising that sustaining and enhancing the agglomerations of global and national activities in CAZ/Isle of Dogs will be central to this but that opportunities must be taken to foster a fairer, more accessible economic geography across London with a renewed emphasis on social integration and cohesion.

The new London Plan will also outline a stronger spatial emphasis with an increased focus on the delivery of development through the intensification of more parts of London.

The decision to leave the EU will also have implications for a range of policy areas the Plan will need to consider, including London’s economic competitiveness, access to labour markets and migration patterns.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following five spatial options were developed for consideration. These options represent a range of potentially implementable spatial strategies and are presented below.

Table 4: Strategic policy options for best use of land.

Option	Description
1. Current London Plan	<ul style="list-style-type: none"> <li>• Economic growth centred in CAZ/Isle of Dogs and town centres, Opportunity Areas, Strategic Outer London Development Centres.</li> <li>• Housing growth is residential-led in Opportunity Areas and town centres.</li> <li>• Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.</li> <li>• Industrial land is a managed release approach based on industrial land benchmarks.</li> <li>• Density based on SRQ matrix.</li> </ul>
2. Sustainable intensification	<ul style="list-style-type: none"> <li>• Economic growth is centred on CAZ/Isle of Dogs, Old Oak Common, Stratford, Opportunity Areas, Strategic Outer London Development Centres and dispersed growth across town centres, inner and outer London.</li> <li>• Housing growth is residential-led in opportunity areas, town centres, publically-owned land and small sites throughout the city.</li> <li>• Promotes town centres sustaining commercial, cultural, social infrastructure and night-time economy development outside CAZ.</li> <li>• Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.</li> </ul>

Option	Description
	<ul style="list-style-type: none"> <li>• A design-led approach is taken to maximise densities, subject to a minimum, particularly in areas that are well connected by high levels of PTAL. Additionally, considers growth corridors based on significant infrastructure delivery.</li> <li>• Transport growth focuses on strategic infrastructure, active travel, sustainable mode share and high density development.</li> <li>• Industrial land management focuses on retention and intensification of industrial floor space and yard capacity, in addition to selective co-location of residential land and complimentary industrial uses.</li> </ul>
3. Polycentric approach	<ul style="list-style-type: none"> <li>• Economic growth is dispersed and evenly distributed to town centres, inner and outer London, including local and neighbourhood centres and street markets.</li> <li>• Housing growth is based on complementary residential led growth in Opportunity Areas, town centres, publically owned land and small sites, following the pattern of economic growth.</li> <li>• Promotes town centres sustaining commercial, cultural, social infrastructure and night-time economy development outside CAZ.</li> <li>• Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.</li> <li>• Density is based on SRQ matrix.</li> <li>• Transport growth focuses on orbital transport connections to improve links between lower-tier town centres and throughout outer London.</li> <li>• No release of industrial land.</li> </ul>
4. Current London Plan and selective green belt release	<ul style="list-style-type: none"> <li>• Economic growth centred in CAZ/Isle of Dogs, in town centres, Opportunity Areas, Strategic outer London Development Centres and in limited green-belt release to serve the local population.</li> <li>• Housing growth is residential-led in Opportunity Areas and town centres. There is additional limited release in sustainable locations identified through the Local Plan process, prioritising previously developed and low performing green belt around commuter hubs.</li> <li>• Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment. Additional green belt release with new local/neighbourhood centres to serve the local population.</li> <li>• Density is based on SRQ matrix.</li> <li>• Transport focuses on strategic infrastructure, active travel, sustainable mode share and high density development.</li> <li>• Industrial land is a managed release approach based on industrial land benchmarks.</li> </ul>
5. Current London Plan and City Region approach	<ul style="list-style-type: none"> <li>• Economic growth is centred in CAZ/Isle of Dogs, Opportunity Areas, town centres, dispersed growth across inner and outer London and investment in growth location within the Wider South East (WSE) and beyond to achieve mutual benefits.</li> <li>• Housing growth is residential-led in Opportunity Areas and town centres. Additional investment in growth locations to achieve mutual benefits. Delivery is across the wider region.</li> <li>• A renewal of medium order town centres, through high-density, housing-led, mixed-use development. Additional coordinated of renewal of town centres across the wider region to achieve mutual benefits.</li> <li>• Density is based on SRQ matrix, supported by exploring opportunities in key growth locations/transport investments around commuter stations and city region centres.</li> </ul>

Option	Description
	<ul style="list-style-type: none"> <li>Transport investment is mutually-beneficial in the WSE and beyond, exploring opportunities to increase efficiency in the transport network across the City Region.</li> <li>Industrial land is managed through selective substitution and/or relocation of capacity outside of London to achieve mutual benefits.</li> </ul>

### 2.4.3 Creating a healthy city

The health of a population is largely contributed to by two main factors: the environment within which the population live and work; and the healthcare that is provided in order to treat acute and chronic conditions resulting from both environmental and hereditary issues.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following three health options were developed for consideration. These options represent a range of potentially implementable health strategies and are presented below.

Table 5: Strategic policy options for creating a healthy city.

Option	Description
1. Prevention	<ul style="list-style-type: none"> <li>Delivering of an environment that promotes Healthy Streets, good building design, enabling healthy choices, promoting active travel, improving air quality, access to green and open spaces, healthy food environment</li> </ul>
2. Cure	<ul style="list-style-type: none"> <li>Provision of health facilities and care to address health issues</li> </ul>
3. Spatially-targeted approach	<ul style="list-style-type: none"> <li>Spatially targeted approach across the wider determinants of health including housing, employment, education etc. to tackle health inequalities</li> </ul>

### 2.4.4 Delivering the homes Londoners need

Having a suitable home, either owned or rented, is one of the biggest contributing factors in empowering a population. Having good quality housing allows someone to retain good physical health and mental wellbeing, can help secure employment and financial stability, and allows for a comfortable lifestyle.

Housing is recently a market led issue with developers responding directly to market forces taking account of housing needs assessments. However, whilst measures have been taken by local authorities to ensure that affordable housing is incorporated within new developments, there is still disparity in the type and tenure of housing being provided and that which is needed.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following four housing options were developed for consideration. These options represent a range of potentially implementable housing strategies and are presented below.

Table 6: Strategic policy options for delivering the homes Londoners need.

option	Description
1. Focus on temporary housing	<ul style="list-style-type: none"> <li>Promotion of quick build housing, such as prefabricated and 3D printed units for short term need.</li> <li>Promotion of short term housing supply on land that is designated for other purposes in the long term.</li> </ul>
2. Delivering against housing need	<ul style="list-style-type: none"> <li>Delivering against housing need- <ul style="list-style-type: none"> <li>focus on family housing</li> <li>focus on one bedroom or studios.</li> <li>greater focus on addressing need i.e. type and size of dwellings.</li> </ul> </li> </ul>
3. Leave delivery to the market forces	<ul style="list-style-type: none"> <li>Developer-led housing provision.</li> </ul>
4. Affordable homes	<ul style="list-style-type: none"> <li>Focus on delivery of affordable homes (concentrating on social/target rents at the expense of total quantum of housing).</li> </ul>

### 2.4.5 Growing a good economy

In order for London to maintain a sustainable economy there should be recognition of the makeup of the economy including the skills, education, mobility and health of its workforce.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following three economic options were developed for consideration. These options represent a full range of potentially implementable economic strategies and are presented below.

Table 7: Strategic policy options for growing a good economy.

Option	Description
1. Investment in Infrastructure	<ul style="list-style-type: none"> <li>Supports investment in infrastructure, i.e. workspaces of different types and sizes.</li> <li>Supports economic growth in CAZ, town centres, and industrial areas.</li> </ul>
2. Dispersed Growth	<ul style="list-style-type: none"> <li>Encourages growth across whole of London.</li> <li>Focuses on local economies.</li> <li>Aims to protect and enhance existing workspaces in London.</li> </ul>
3. Market Forces	<ul style="list-style-type: none"> <li>Leaves growth to market forces.</li> <li>Type and nature of employment space unmanaged.</li> </ul>
4. Affordable Workspace	<ul style="list-style-type: none"> <li>Emphasises delivery of affordable workspaces.</li> <li>Particular focus on areas where cost is high.</li> </ul>

### 2.4.6 Increasing efficiency and improving resilience

The environmental and political threats that are faced globally are applicable to London. There is both a preventative and resilience solution to these threats that should be considered as part of robust planning and development.

Based on the policy levers described in Section 2.3, ongoing consultation and iterative assessment through the IIA process, the following three efficiency and resilience options were developed for consideration. These options represent a full range of potentially implementable efficiency and resilience strategies and are presented below.

Table 8: Strategic policy options for increasing efficiency and improving resilience.

option	Description
1. Climate Change Mitigation	<ul style="list-style-type: none"> <li>• Uses principles of carbon reduction to mitigate against climate change.</li> </ul>
2. Climate Change Adaptation	<ul style="list-style-type: none"> <li>• Prioritises adaption to climate change.</li> <li>• Aims to tackle flood risk, and reduce overheating, extreme cold, and fuel poverty.</li> </ul>
3. Safe Designed City	<ul style="list-style-type: none"> <li>• Focuses on improving safety and security in London through design.</li> <li>• Aims to protect against fire, terrorism, and crime.</li> </ul>
4. Resource Efficiency	<ul style="list-style-type: none"> <li>• Promotes principles of a circular economy.</li> <li>• Promotes innovation to improve resource management.</li> <li>• Encourages co-ordination between infrastructure providers.</li> </ul>

All these strategic options have been assessed in detail, the results of which are presented in section 8. The outcome of these assessments were used to identify the preferred cross cutting strategic policies that would be incorporated in to the draft London Plan, as highlighted in section 2.5

## 2.5 Draft London Plan Policies

The remainder of the draft London Plan consists of 105 policies spread over 9 chapters covering the following topics:

### Chapter 2 Spatial Development Pattern

- SD1 Opportunity Areas
- SD2 Collaboration in the Wider South East
- SD3 Growth Locations in Wider South East and beyond
- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in CAZ
- SD6 Town centres
- SD7 Town centre network
- SD8 Town centres: Development principles and local plans
- SD9 Town centres: Local partnership and implementation

SD10 Strategic and local regeneration

### Chapter 3 Design

- D1 London's form and characteristics
- D2 Delivering good design
- D3 Inclusive design
- D4 Housing quality and standards
- D5 Accessible housing
- D6 Optimising housing density
- D7 Public realm
- D8 Tall buildings
- D9 Basement development
- D10 Safety, security and resilience to emergency
- D11 Fire Safety
- D12 Agent of change
- D13 Noise

### Chapter 4 Housing

- H1 Increasing housing supply
- H2 Small sites
- H3 Monitoring housing targets
- H4 Meanwhile use
- H5 Delivering affordable housing
- H6 Threshold approach to applications
- H7 Affordable housing tenure
- H8 Monitoring of affordable housing
- H9 Vacant building credit
- H10 Redeveloping existing housing and estate regeneration
- H11 Ensuring the best use of stock
- H12 Housing type mix

- H13 Build to rent
- H14 Supported and specialised accommodation
- H15 Specialist older people's housing
- H16 Gypsy and Traveller accommodation
- H17 Purpose built student accommodation
- H18 Large scale purpose built shared living

### Chapter 5 Social Infrastructure

- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities
- S6 Public toilets
- S7 Burial space

### Chapter 6 Economy

- E1 Offices
- E2 Low cost business space
- E3 Affordable workspace
- E4 Land for industry, logistics and services to support London's economic function
- E5 Strategic Industrial locations (SIL)
- E6 Locally Significant Industrial sites
- E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
- E8 Sector Growth opportunities and clusters
- E9 Retail, markets and hot food takeaways
- E10 Visitor infrastructure
- E11 Skills and opportunities for all

### Chapter 7 Heritage and Culture

- HC1 Heritage conservation and growth
- HC2 World heritage sites
- HC3 Strategic and local views
- HC4 London view management framework
- HC5 Supporting London's cultural and creative industries
- HC6 Supporting the night-time economy
- HC7 Protecting public houses

### Chapter 8 Green infrastructure and natural environment

- G1 Green infrastructure
- G2 London's Green belt
- G3 Metropolitan open land
- G4 Local green and open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- G9 Geodiversity

### Chapter 9 Sustainable Infrastructure

- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy Infrastructure
- SI4 Managing Heat Risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI9 Safeguarding waste sites

- S10 Aggregates
- SI11 Hydraulic fracturing (fracking)
- SI12 Flood risk management
- SI13 Sustainable drainage
- SI14 Waterways - strategic role
- SI15 Water transport
- SI16 Waterways - use and enjoyment
- SI17 Protecting London's waterways

## Chapter 10 Transport

- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car Parking
  - T6.1 Residential parking
  - T6.2 Office parking
  - T6.3 Retail parking
  - T6.4 Hotel and leisure uses parking
  - T6.5 Non-residential disabled persons parking
- T7 Freight and servicing
- T8 Aviation
- T9 Funding transport infrastructure through planning

## Chapter 11

- DF1 – Delivery of the Plan and Planning Obligations

## 3 IIA methodology and approach

### 3.1 Stages of the IIA process

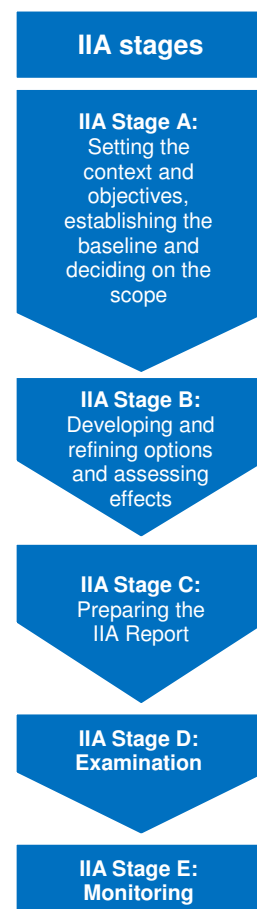
The IIA Report provides an assessment of the draft London Plan and its contribution towards achieving a range of environmental, economic, health, equality, crime and safety, and other objectives. The approach adopted in the IIA process follows the stages of SEA, identified in the IIA flow diagram adjacent. This approach has been expanded to include a wider range of issues normally found within sustainability appraisal (including SEA requirements), in addition to those relevant to HIA, EqIA and CSIA.

#### 3.1.1 Stage A: Scoping stage

The scoping stage involved collating information on the economic, social and environmental aspects of London, identifying and reviewing the plans programmes and strategies that will impact upon the draft London Plan, identifying the main sustainability issues and developing sustainability objectives to allow the likely significant effects of the London Plan to be assessed.

The scoping report was issued to the statutory consultation bodies indicated within the SEA Regulations as well as targeted stakeholders. In summary, consultation responses related to the following points:

- Baseline - Updates and clarification – heritage, views, natural environment, Thames Estuary, air quality, water bodies, flooding;
- Updates to policy guidance – heritage, flood risk;
- Additional issues and opportunities identified in relation to heritage and townscape, water, flooding, circular economy, infrastructure;
- Suggestions for improvements to guide questions - heritage, culture, zero carbon, air quality, water quality;
- Clarification sought for strategic option appraisal, suggestions given for revising strategic options;
- Plans and Programmes – recognition of those outside the London boundary;
- option should set out the positive and negative impacts;
- Equalities questions were under represented; and
- Monitoring of the London Plan.



#### 3.1.2 Stage B: Developing and refining options and assessing effects

The assessment stage examined the likely significant effects of the London Plan policies. The IIA objectives and assessment criteria (see section 1) were used as to assess the effects. The preferred strategic options were selected and the reasons for taking forward these, and rejecting other alternatives were assessed.

A full IIA of the preferred policy options was undertaken to test them against the requirements of SEA, EqIA, HIA and CSIA. Where the assessment identified significant adverse effects, measures were identified that could be implemented to avoid or reduce this magnitude. The proposed mitigation included refinement or rejection of particular strategic policy options and were integrated into the second drafts of the London Plan policies where appropriate.

#### 3.1.3 Stage C: Preparing the IIA Report

This IIA report summarises the assessment in terms of what was done and how it was undertaken. The purpose of the IIA report is to provide sufficient environmental, economic and social information to the GLA in order for a fully informed decision to be made regarding how policies should be adopted. This Draft IIA report is produced as per the signposting of legal requirements presented in Table 1.

#### 3.1.4 Stages D and E: Further stages

The IIA and preferred policies will be subject to consultation under this stage. If, following consultation on the draft London Plan, changes are required that have not been subject to an IIA, then additional IIA will be undertaken. If this is necessary, then this IIA Report will be updated, with a final IIA Report accompanying the publication of the London Plan.

Once the London Plan has been formally published, an IIA Post-Adoption Statement will be prepared that addresses the requirements of Stage E of the IIA process, monitoring. The purpose of the IIA is to demonstrate how:

- Environmental, social and economic considerations have been taken in to account as part of developing the London Plan;
- The findings of the IIA report have been taken in to account;
- How the opinions expressed by consultees have been taken in to account;
- The reasons why the preferred options of the London Plan were taken forward and why reasonable alternatives were discounted; and
- The proposed indicative regime that will be used to monitor the effects of implementing the London Plan policies in terms of achieving the IIA objectives.



### 3.2 IIA Scope

### 3.3 Temporal scope

The effect of the policies associated with the London Plan may change over time. For the purpose of the assessment the timescales may be defined as follows:

- Short term: effects that occur within the first five years of the implementation of the London Plan;
- Medium term: effects occurring between five and 15 years following the implementation of the London Plan; and
- Long term: effects occurring beyond 15 years and which may arise beyond the London Plan’s lifetime of 2041.

#### 3.3.1 Geographic scope

This assessment will include any areas affected by the draft replacement London Plan within London and, where appropriate, beyond the boundaries into the Wider South East Region (Figure 2, Figure 3 and Figure 4).

Figure 2: Geographic scope - London and the Wider South East

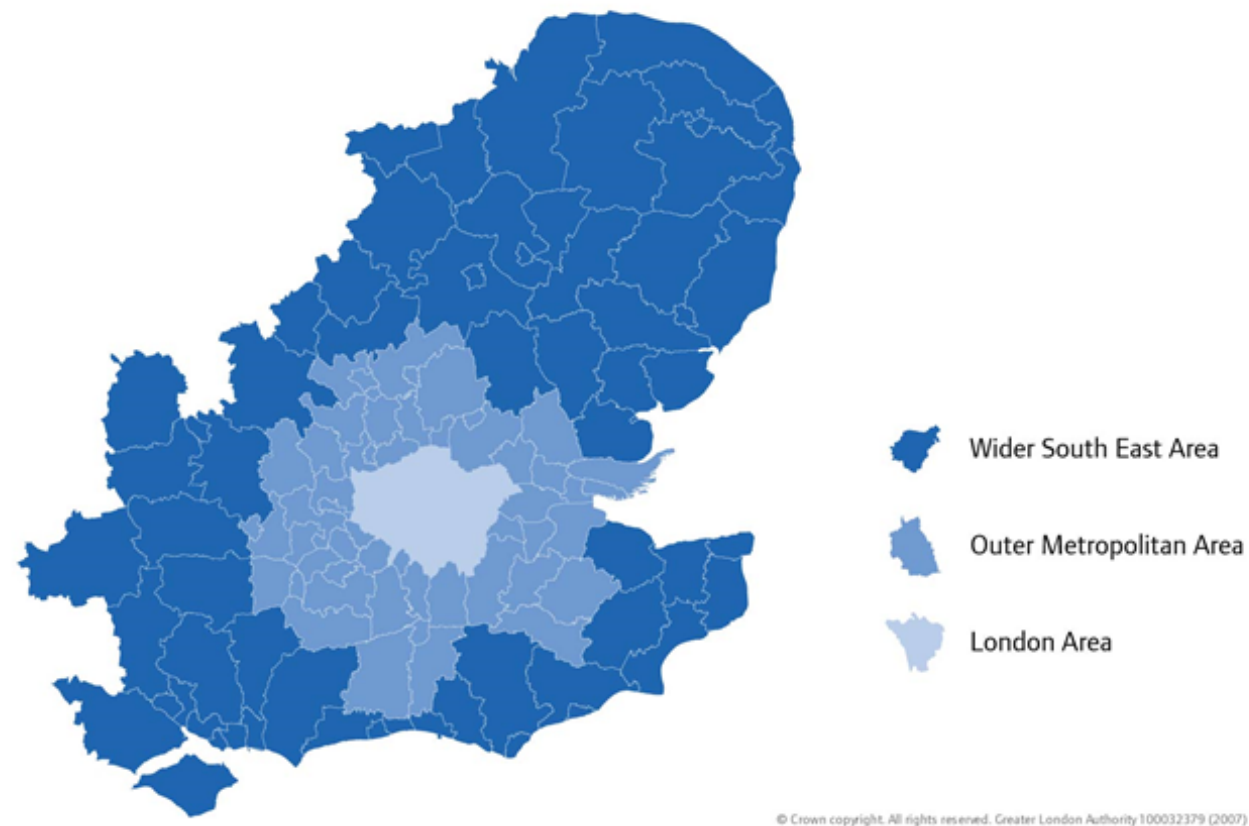


Figure 3: Geographic scope - London boroughs



Figure 4: Geographic scope - CAZ



### 3.4 How the IIA influenced the Draft London Plan

The IIA process has actively influenced the development of the Draft London Plan to ensure the strategic options and policies successfully addresses the key social, environmental and economic issues facing London, and ultimately contribute to sustainability.

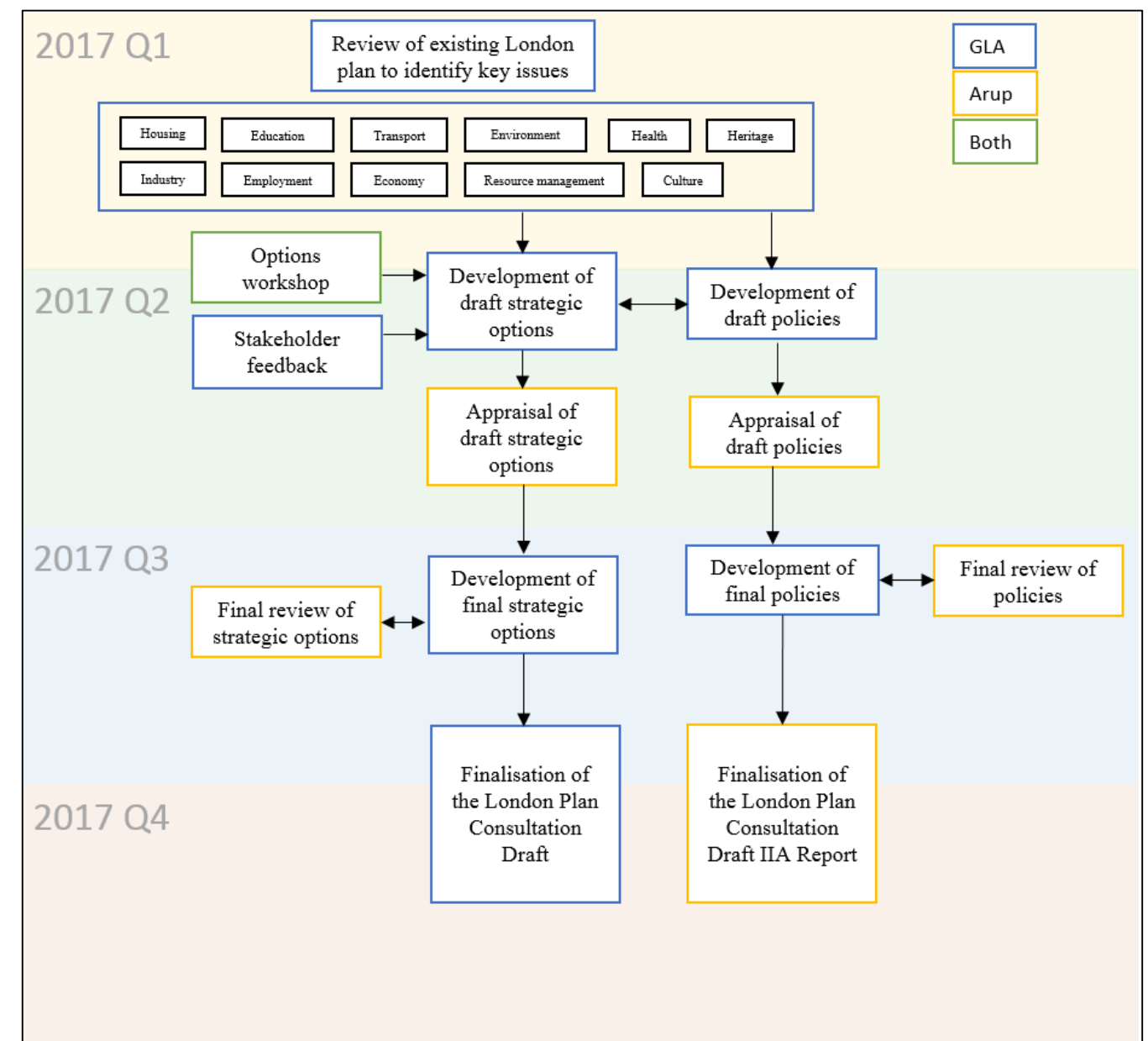
The IIA team and London Plan team have been closely engaged to ensure the delivery of advice and recommendations during the development of the options and policies was continuous and reactive. The early identification of issues ensured options and policies evolved to maximise benefits and minimise any negative effects.

The IIA has been an iterative and dynamic process with many tasks supporting each other to ensure meaningful contribution (Figure 5). These include:

- An options workshop to consider a variety of spatial options across London and how they would impact on social, environmental and economic issues;

- A detailed review was undertaken of the strategic options, considering how each policy would impact the 24 key objectives set out in Section 1 from a health, environmental, equality and safety perspective (reflective of the HIA, SEA, EqIA and Community Safety Assessment requirements). These findings informed the preferred options, which were either the most appropriate option chosen, or a combination of the options. An appraisal was undertaken of the final options to ensure they remained appropriate and effective; and
- A detailed review was undertaken of the draft policies, considering how each policy would impact the 24 key objectives set out in Section 1 from a health, environmental, equality and safety perspective (reflective of the HIA, SEA, EqIA and Community Safety Assessment requirements). The results were fed back to London Plan team to support the development of the final policies.

Figure 5: London Plan and IIA iterative process



## 4 Review of relevant plans, programmes, strategies and objectives

### 4.1 Introduction

The London Plan and the IIA were influenced by many different plans and programmes. This is in accordance with the SEA Directive which requires the review of relevant plans and programmes to be completed in the preparation of the document:

*‘the plan’s relationship with other relevant plans and programmes’ and ‘the environmental protection objectives, established at international, (European) Community or national level, which are relevant to the plan...and the way those objectives and any environmental considerations have been taken into account during its preparation’.* Directive 2001/42/EC SEA Annex 1 (a), (e)

The first stage of completing the IIA was to review relevant international, national, regional and local policy guidance, plans and strategies. This ensures that:

- the London Plan and IIA framework are in line with the requirements of other relevant plans and policies;
- that inconsistencies or constraints are suitably dealt with;
- sustainability objectives, key targets and indicators are reflected in the IIA; and
- relevant baseline data is accounted for.

### 4.2 Document review for London

The relevant plans, policies and programmes that were reviewed in the Scoping Report are summarised in Table 9. The identification of relevant plans, policies and programmes is an ongoing process and the list will continue to be updated in any subsequent IIA reports. The full Scoping Report context review is in Appendix C.

Table 9: Relevant plans and programmes that inform the IIA process

<b>Social integration and inclusion</b>
<ul style="list-style-type: none"> <li>• Equality Act, 2010</li> <li>• GLA’s equal life chances for all, 2014</li> </ul>
<b>Health and health inequalities</b>
<ul style="list-style-type: none"> <li>• National Planning Policy Framework, 2012</li> <li>• Child Obesity Plan, 2016</li> <li>• London health and care collaboration agreement and London devolution deal, 2015</li> <li>• Better health for London: next steps, 2014</li> <li>• Mayor’s health inequalities strategy delivery plan, 2015-2015 Indicator report</li> <li>• The London health inequalities Strategy</li> </ul>
<b>Crime, safety and security</b>
<ul style="list-style-type: none"> <li>• Crime and Disorder Act, 1998</li> <li>• Police and Justice Act, 2006</li> </ul>

<ul style="list-style-type: none"> <li>• National Planning Policy Framework, 2012</li> <li>• Mayor’s office for policing and crime’s (MOPAC) Police and crime plan, 2013-16</li> <li>• Mayor’s safer streets for London plan, 2013</li> <li>• London assembly police and crime committee report, policing the night-time economy, 2016</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• Housing and planning bill, 2015</li> <li>• National planning policy framework, 2012</li> <li>• Outer London commission sixth report: Barrier to housing delivery, 2016</li> <li>• Outer London commission seventh report: Accommodating London’s growth, 2016</li> <li>• GLA equal life chances for all, 2014</li> <li>• GLA housing strategy, 2014</li> </ul>
<b>Sustainable land use</b>
<ul style="list-style-type: none"> <li>• National planning policy framework, 2012</li> <li>• Airport commission’s final report, 2015</li> <li>• Outer London commission seventh report: Accommodating London’s growth, 2016</li> </ul>
<b>Accessibility</b>
<ul style="list-style-type: none"> <li>• National planning policy framework, 2012</li> <li>• GLA’s equal life chances for all, 2014</li> <li>• London health inequalities strategy, 2010</li> <li>• Your accessible transport network, 2015</li> </ul>
<b>Connectivity</b>
<ul style="list-style-type: none"> <li>• National planning policy framework, 2012</li> <li>• Airport commission’s final report, 2015</li> <li>• Freight 2010-15 government policy (DfT)</li> <li>• Rail network 2010-2015 Government policy (DfT)</li> <li>• London infrastructure plan, 2015</li> <li>• Local transport 2010-2014 Government policy (DfT), 2015</li> <li>• Connecting the capital, 2015</li> <li>• More residents more jobs, 2015</li> </ul>
<b>Economic competitiveness</b>
<ul style="list-style-type: none"> <li>• Fixing the foundations: creating a more prosperous nation, 2015</li> <li>• National planning policy framework, 2012</li> <li>• Jobs and growth plan for London, 2013</li> <li>• Outer London commission seventh report: Accommodating London’s growth, 2016</li> <li>• London infrastructure plan update, 2015</li> <li>• London in comparison with other global cities, 2016</li> <li>• The changing spatial nature of business and employment in London, 2016</li> <li>• London’s digital economy, 2012</li> <li>• Growing together II: London and the UK economy, 2014</li> </ul>
<b>Culture</b>
<ul style="list-style-type: none"> <li>• World cities culture report 2015- measures and cultural assets</li> <li>• Cultural white paper, 2016</li> </ul>

<ul style="list-style-type: none"> <li>• Open studios network and artist studios report, 2014</li> <li>• Arts council England strategy</li> <li>• The Mayor's A-Z of planning and culture, 2015</li> <li>• Mayor's cultural strategy, cultural metropolis, 2010</li> <li>• Mayor's cultural strategy-achievements and next steps</li> <li>• Mayor's cultural tourism for London 2015-2017, take a closer look</li> <li>• GLA night-time economy commission, strategic case and investment proposal, 2016</li> <li>• London's grassroots music venues rescue plan, 2015</li> </ul>
<b>Employment</b>
<ul style="list-style-type: none"> <li>• London's changing economy since 2008, 2015</li> <li>• Part-time employment in London, 2015</li> <li>• Patterns of low pay, 2012</li> </ul>
<b>Education and skills</b>
<ul style="list-style-type: none"> <li>• GLA equal life chances for all, 2014</li> <li>• Mayor's academic forum recommendations, 2015</li> </ul>
<b>Air quality</b>
<ul style="list-style-type: none"> <li>• EU ambient air quality directive, 2008</li> <li>• EU thematic strategy on air pollution, 2005</li> <li>• Air quality standards regulation, 2010</li> <li>• Environment Act, 1995</li> <li>• Air quality strategy for England, Scotland, Wales and Northern Ireland</li> <li>• National planning policy framework, 2012</li> <li>• UK's air quality action plan, 2016</li> <li>• London air quality network summary report, 2014</li> <li>• Transport emissions roadmap (TERM), cleaner transport for cleaner London, 2014</li> <li>• Transport action plan, improving the health of Londoners, 2014</li> <li>• Cleaning the air, the Mayor's air quality strategy, 2010</li> <li>• Cleaner air for London, the progress report on the delivery of the Mayor's air quality strategy, 2015</li> <li>• WHO air quality guidelines</li> <li>• Clean air Act, 1993</li> <li>• Mayor's transport strategy, 2010</li> </ul>
<b>Climate change</b>
<ul style="list-style-type: none"> <li>• Kyoto climate change protocol and UK climate change programme</li> <li>• Climate change Act, 2008</li> <li>• UK low carbon transition plan, 2009</li> <li>• London climate change mitigation and energy strategy, 2011</li> <li>• Mayor's climate change adaptation strategy, managing risk and increasing resilience, 2011</li> <li>• Transport emissions roadmap (TERM), cleaner transport for cleaner London, 2014</li> <li>• EC white paper: adapting to climate change</li> <li>• Climate change risk assessment</li> <li>• National adaptation programme</li> <li>• The carbon plan</li> <li>• Promotion of the use of energy from renewable sources directive, 2009</li> <li>• Arup's reducing urban heat risk, 2014</li> <li>• Joseph Rowntree Foundation's vulnerability to heatwaves and drought- adaptation to climate change, 2011</li> </ul>

<ul style="list-style-type: none"> <li>• The London Climate Change Partnership overheating thresholds report, 2012</li> </ul>
<b>Energy use and supply</b>
<ul style="list-style-type: none"> <li>• Scenarios to 2050- London energy plan</li> <li>• UK renewable energy strategy, 2015</li> <li>• Energy white paper: meeting the energy challenge, 2007</li> <li>• Mayor's climate change mitigation and energy annual report, 2013-2014</li> <li>• London's zero carbon energy resource, 2013</li> <li>• London infrastructure plan, 2050</li> <li>• London energy plan scenarios to, 2050</li> </ul>
<b>Water resources and quality</b>
<ul style="list-style-type: none"> <li>• Water framework directive, 2000</li> <li>• Water Act, 2003</li> <li>• River basin management plan for the Thames River Basin District, 2009</li> <li>• Mayor's water strategy</li> <li>• London abstraction licencing strategy, 2013</li> </ul>
<b>Geology and soils</b>
<ul style="list-style-type: none"> <li>• EU soil strategy, 2016</li> <li>• Seventh environment action programme, 2014</li> <li>• EU environmental liability directive 99/31/EC</li> <li>• Safeguarding our soils- a strategy for England 2009</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Flood and water management Act, 2010</li> <li>• UK water strategy, 2008</li> <li>• National planning policy framework, 2012</li> <li>• London's regional flood risk appraisal, 2014</li> <li>• Thames catchment flood management plan, 2009</li> <li>• Securing London's water future, the Mayor's water strategy, 2011</li> <li>• Thames Estuary 2100 plan, 2014</li> <li>• London resilience partnership strategic flood response framework, 2015</li> </ul>
<b>Natural environment and natural capital</b>
<ul style="list-style-type: none"> <li>• Directive on the conservation of wild birds 79/409/EEC</li> <li>• EC Directive on the conservation of habitats and wild fauna and flora 92/43/EEC</li> <li>• Conservation of habitats and species regulations, 2010</li> <li>• Wildlife and countryside Act, 1981</li> <li>• Natural environment and rural communities Act, 2006</li> <li>• England biodiversity strategy: climate change adaptation principles</li> <li>• The guidance for local authorities on implementing the biodiversity duty, 2007</li> <li>• UK post-2010 biodiversity framework</li> <li>• Biodiversity, 2020</li> <li>• The natural choice- securing the value of nature, 2011</li> <li>• National planning policy framework, 2012</li> <li>• Mayor's biodiversity strategy, connecting with London's nature</li> <li>• Mayor's biodiversity strategy update, a review of progress and priorities for action, 2015</li> <li>• London underground biodiversity action plan 2010, connecting nature, 2010</li> <li>• Green capital. Green infrastructure for a future city, 2016</li> </ul>

<b>Townscape and landscape</b>
<ul style="list-style-type: none"> <li>National planning policy framework, 2012</li> <li>European landscape convention, 2000</li> <li>Countryside and rights of way Act, 2000</li> <li>Streetscape guidance, 2016</li> <li>Publicly accessible space, 2011</li> </ul>
<b>Historic environment</b>
<ul style="list-style-type: none"> <li>National planning policy framework, 2012</li> <li>Planning (listed buildings and conservation) Act, 1990</li> <li>Ancient monuments and archaeological areas Act ,1979</li> <li>UNESCO guidelines on World Heritage Sites</li> <li>Palace of Westminster and Westminster Abbey, including St Margaret’s Church World Heritage sites management plan, 2007</li> <li>Tower of London World Heritage site draft management plan, 2016</li> <li>Maritime Greenwich World Heritage site management plan, 2014</li> <li>Royal Botanic Gardens, Kew, World Heritage site management plan, 2011</li> <li>Historic environment good practice advice planning, 2015</li> <li>Conservation area designation, appraisal and management, Historic England Advice</li> <li>Mayor’s cultural strategy, cultural metropolis, 2010</li> <li>Mayor’s cultural tourism vision for London 2014, Take a closer look</li> <li>World cities culture report 2015- measures and cultural assets</li> </ul>
<b>Materials and waste</b>
<ul style="list-style-type: none"> <li>EU waste framework directive 2008/98/EC</li> <li>Waste (England and Wales) regulations, 2014</li> <li>National planning policy for waste, 2014</li> <li>UK waste strategy for England, 2007</li> <li>Mayor’s municipal waste strategy, London’s waste resources, 2011</li> <li>Mayor’s business waste management strategy, 2011</li> </ul>
<b>Noise and vibration</b>
<ul style="list-style-type: none"> <li>EC noise directive 2000/14/EC</li> <li>Noise policy statement for England, 2010</li> <li>National planning policy framework, 2012</li> <li>Mayor’s ambient noise strategy, 2004</li> </ul>

Since the publication of the scoping report, the following documents have been published which are relevant to the London Plan.

Table 10: Additional relevant plans and programmes

Topic	Document Title	Key objectives, targets, and indicators relevant to the London Plan and IIA	Implications for the IIA
Connectivity	Draft Mayor’s Transport Strategy (2017)	Supports the Healthy Streets Approach to encourage sustainable forms of transport, such as walking and cycling. Aims to reduce private vehicle use in London and plan growth around the transport network.	The plan policies should reflect the priority issues set out in this strategy. <b>IIA Objective 3, 9 and 11</b>

Topic	Document Title	Key objectives, targets, and indicators relevant to the London Plan and IIA	Implications for the IIA
Natural environment and natural capital	Draft London Environment Strategy (2017)	Identifies the key environmental challenges in London including air quality, biodiversity, greenhouse gas emissions, green space, energy use, waste, heat risk, flood risk, water scarcity, water quality and ambient noise. The aims identified in the strategy include: <ul style="list-style-type: none"> <li>London to have the best air quality of any major city by 2050;</li> <li>More than half of London’s area to be green and to increase tree cover by 10% by 2050;</li> <li>London to be a zero carbon city by 2050;</li> <li>London to be a zero waste city;</li> <li>London to be resilient to climate change impacts; and</li> <li>Reduce noise to improve the quality of life of Londoners.</li> </ul>	The plan policies should reflect the move towards a more environmentally-sound city.  <b>IIA Objective 14, 15, 16, 20, 23 and 24</b>
Housing	Draft London Housing Strategy (2017)	Identifies the vision for housing in London, prioritising issues including: <ul style="list-style-type: none"> <li>Building homes for Londoners;</li> <li>Delivering genuinely affordable homes;</li> <li>High quality homes and inclusive neighbourhoods;</li> <li>A fairer deal for private renters and leaseholders; and</li> <li>Tackling homelessness and helping rough sleepers.</li> </ul>	The plan policies should reflect the priority issues set out in this strategy.  <b>IIA Objective 5</b>
Health	Draft London Health Inequalities Strategy (2017)	Outlines how the main issues of health can be managed in London. The key priority areas are: <ul style="list-style-type: none"> <li>Healthy children- having a healthier start in life and healthier areas to play;</li> <li>Healthy minds- to improve mental health in London and inspire more Londoners to have mental health first aid training;</li> <li>Healthy places- an environment that promotes healthy living and improving London’s air quality;</li> <li>Healthy communities- encourage London’s diverse communities to be healthy and thriving; and</li> <li>Healthy habits- to make healthy choices the easy choices in London and reduce childhood obesity rates.</li> </ul>	The plan policies should reflect the move towards a healthier city.  <b>IIA Objective 1 2, 3 and 14</b>

## 5 Baseline information

### 5.1 Scope and purpose of the baseline

The Environmental Assessment of Plans and Programmes Regulations 2004 require a discussion of the ‘...relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ (Annex 1 (b)). For IIA, the baseline and identification of key issues must also consider social and economic aspects in addition to the environmental issues specified in the SEA Directive.

Key issues derived from the baseline review are presented in section 1.

The baseline information will inevitably change over time, as such it is important that it is monitored and regularly revised. A full baseline is in Appendix B.

### 5.2 Demographic change

London has experienced a significant increase in population, peaking at 8.9 million people in 2017. It is expected that by 2041 there will be an additional 2 million people. The age structure of London is relatively young, with a median age of 34 years compared to the national average of 39 years. London does have an ageing population however, with the population of over 65s expected to increase by 65% of 2011 figures by 2041.

London currently has a net domestic out migration of 50,000pa. The city’s international net migration is c.70-90,000pa. Future projections are harder to predict, especially due to the 2016 referendum decision to leave the EU.

### 5.3 Social integration and inclusion

By 2041, 16% of the population is predicted to be 65 and over, compared with 11.6% in 2015. 45% of residents identified themselves as White British and 40% as Black, Asian and minority ethnic (BAME). 26 of the 30 most ethnically diverse local authorities in the UK are in London.

More than one in five Londoners use a language other than English as their main language at home. Polish, Bengali and Gujarati are the most widely spoken, each used by more than 1000,000 Londoners at home. A high proportion of residents were born outside the UK (37%). Globally, London has the second largest foreign-born population, behind New York City, in terms of absolute numbers.

14% of residents reported having long term health or disability problems which limit their day-to-day activities, lower than the national average of 18%. The indices of multiple deprivation demonstrate that London has a large number of local areas which fall within the most deprived areas of the country.

After accounting for housing costs, 27% of the population of London live in relative poverty (below 60% of the national median). This compares to 20% nationally. Housing is a significant factor in driving these high rates of poverty, with poverty rates almost doubling after housing costs are

considered. Although employment is identified as one of the best ways to escape poverty, in London 21% of working families still live in poverty.

### 5.4 Health and health inequalities

Life expectancy at birth in London is 80.3 years for men and 84.2 for women, slightly higher than the national average. Healthy life expectancy<sup>6</sup> is not keeping pace with overall life expectancy, at 64 years for men and 64.1 years for women.

In terms of healthy lifestyles, 57.8% of adults in London are physically active, slightly higher than the national average. Excess weight in adults is 48.5% across London.

In London, 55% of children are physically active. Childhood obesity has been identified as a problem in London, with 22.2% of 4-5 year olds classified as overweight or obese, rising to 37.2% for 10-11 year olds. The number of fast food outlets was found to rise in more deprived areas and a large number were located near schools.

Levels of life satisfaction vary across boroughs, but London was found to have low levels of reported life satisfaction and high levels of anxiety compared to other UK regions. London’s average anxiety rating was 3.15 compared to 2.93 nationally (on an eleven-point scale).

The number of GP’s per population varies between boroughs, with 19 boroughs having less than the English average (0.57 GP’s per 1000 population).

Air quality in London is improving, but still fails to meet limits for NO<sub>2</sub>. Nearly 25% of all schoolchildren in London are reported to be exposed to levels of air pollution which exceed legal limits. The London Health Commission attributes 7% of all deaths to air pollution, and poor air quality has also been associated with over 3,000 hospital admissions, increased allergies, low birth weights and increased chronic diseases in later life.

### 5.5 Crime, safety and security

In 2015 36% of Londoners were ‘worried’ or ‘very worried’ about crime in their local area. Between 2008 and 2016, theft and handling was consistently the most common type of crime. Violence against a person was the next most common and has steadily risen over the last four years.

In general, levels of crime have consistently fallen since 2008. The number of victim based crimes has decreased, with 53,000 fewer offences in recent years compared to 2008/09. However, reports of hate crime have risen over the last few years, with racist and religious crime representing 88% of all hate crimes.

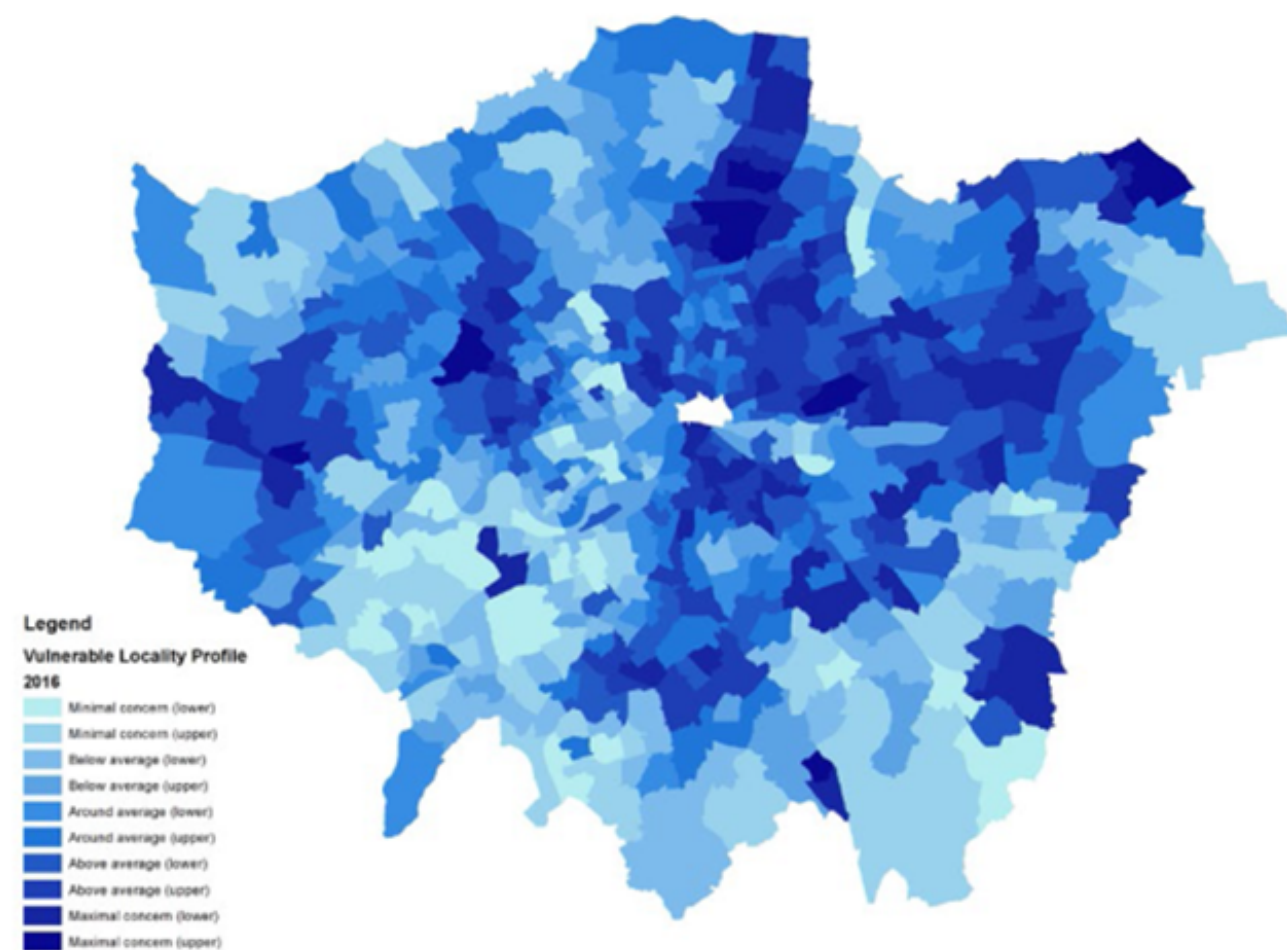
The Vulnerability Locality Profile (VLP) maps the relative safety of wards across London (Figure 6). Within the most vulnerable areas, there are higher rates of crime, particularly against a person.

<sup>6</sup>The amount of time people can expect to live without suffering from ill health

Haringey and Enfield had the most number of highly vulnerable wards in their boundaries. Over 70% of the least vulnerable wards were located in South London.

Fear of crime is another concern. A 2014 TfL survey indicated that 31% of Londoners were put off using public transport due to concerns of anti-social behaviour.

Figure 6: Vulnerability locality profile



## 5.6 Housing

The 2017 London Strategic Housing Market Assessment (SHMA) estimates London will need approximately 66,000 new homes every year between 2019 and 2041, of which 35% should be market homes, 47 low cost rent and 18% intermediate.

Over the last 10 years, London has delivered on average approximately 25,000 net conventional homes each year, including new build housing and additional housing from change of use and conversions. This figure rises to approximately 29,500 when non-self-contained housing (e.g. student halls of residence) and vacant homes returning to use are accounted for.

<sup>7</sup> The English housing Survey references four visitability features: level access, flush threshold, a sufficiently wide door and circulation space to move around, and the use of a WC on the entry floor.

Over the last three years, 28% of overall net conventional housing planning permissions were affordable units. This provides on average 7,176 net affordable homes a year, significantly less than the most recent London Plan, which targeted 17,000 affordable homes per year. In March 2015, the net conventional housing pipeline consisted of 261,600 homes, of which 51% were under construction. However, over half of this pipeline is concentrated in schemes over 500 units in size, which may take many years or decades to be completed.

The average density of homes in 2014/15 was 160 dwellings per hectare. The 2011 census identified that flats comprised just over half of London's accommodation, compared with 20% nationally. New homes in London are more compact, with an average floor areas of 80m<sup>2</sup>, compared with 92m<sup>2</sup> nationally.

The private rented sector makes up 26% of housing tenures in London and social housing makes up 24%. The proportion of Londoners who owned their own home peaked in 1991, before falling to just under half at the 2011 Census. Nationally, 64% of households owned their home, with 18% each in social and private rented accommodation.

Between 2005 and 2015 average rents rose by 29%. The median cost of renting a two bedroom flat is £1,400, though this varies significantly by borough. Inner boroughs have a median monthly rent of £1,650, whereas in outer boroughs it falls to £1,200. In 2014, house prices were 10 times median earnings, reducing the ability for many Londoners to own their home. In 1990 57% of those aged 25-34 years owned their home in London, which had fallen to 26% by 2014.

There are 48,390 second homes in London and just over half of these are in four boroughs, Kensington and Chelsea, Westminster, Camden and Tower Hamlets.

Approximately 8% of households in London are in overcrowded accommodation, which rises to 13% in some boroughs. In March 2015, there were 48,240 homeless households in temporary accommodation, an increase of 11% from 2014 and 35% in 2010. There were 7,580 people sleeping rough in London in 2014/15, an increase of more than a thousand people from 2013/14.

Approximately 21% of homes in London are below the official Decent Homes Standard. 30% of private rented homes are below this standard, compared with 18% of owner occupied and 19% socially rented. Around 10% of London households are estimated to be living in fuel poverty, just below the national rate.

The English Housing Survey (EHS) data suggests that 180,000 households (6%) in London say that illness or disability of their household members requires adaptations to their homes. Of this group, 20,000 said they were currently attempting to move to a more suitable home. The EHS showed that 20% of dwellings in the capital had no visitable features<sup>7</sup> and only 9% of the existing housing stock is estimated to have all four visitability features identified by the EHS. The London Plan Annual Monitoring Report identified that 93% of new homes complied with the Lifetime Home Standards.

### 5.7 Sustainable land use

London has a distinct geography of activities. Inner London is characterised by a strong focus on commercial, cultural and employment activities, while outer London comprises mostly residential activity.

The Central Activities Zone (CAZ) covers London’s geographic, economic and administrative centres. It brings together the largest concentration of London’s financial and globally-oriented business services. Almost a third of all London jobs are based there and, together with the Northern Isle of Dogs (including Canary Wharf), it has historically experienced the highest rate of growth in London.

Town Centres are a focus on a wide range of uses including shopping and leisure, arts and culture, housing and employment, civic and social infrastructure, and heritage assets. They also serve as community hubs, providing a sense of place and identity and often include valued historic buildings, spaces and uses. Figure 7 shows the different types of centres within London.

Figure 7: Town centre network



© Crown Copyright and database right 2014. Ordnance Survey 100032216 GLA

Opportunity Areas are the capital’s major reservoirs of brownfield land with significant capacity to

accommodate new housing, commercial and other developments linked to existing, or improving, public transport. Almost two thirds of the land within Opportunity Areas is in outer London.

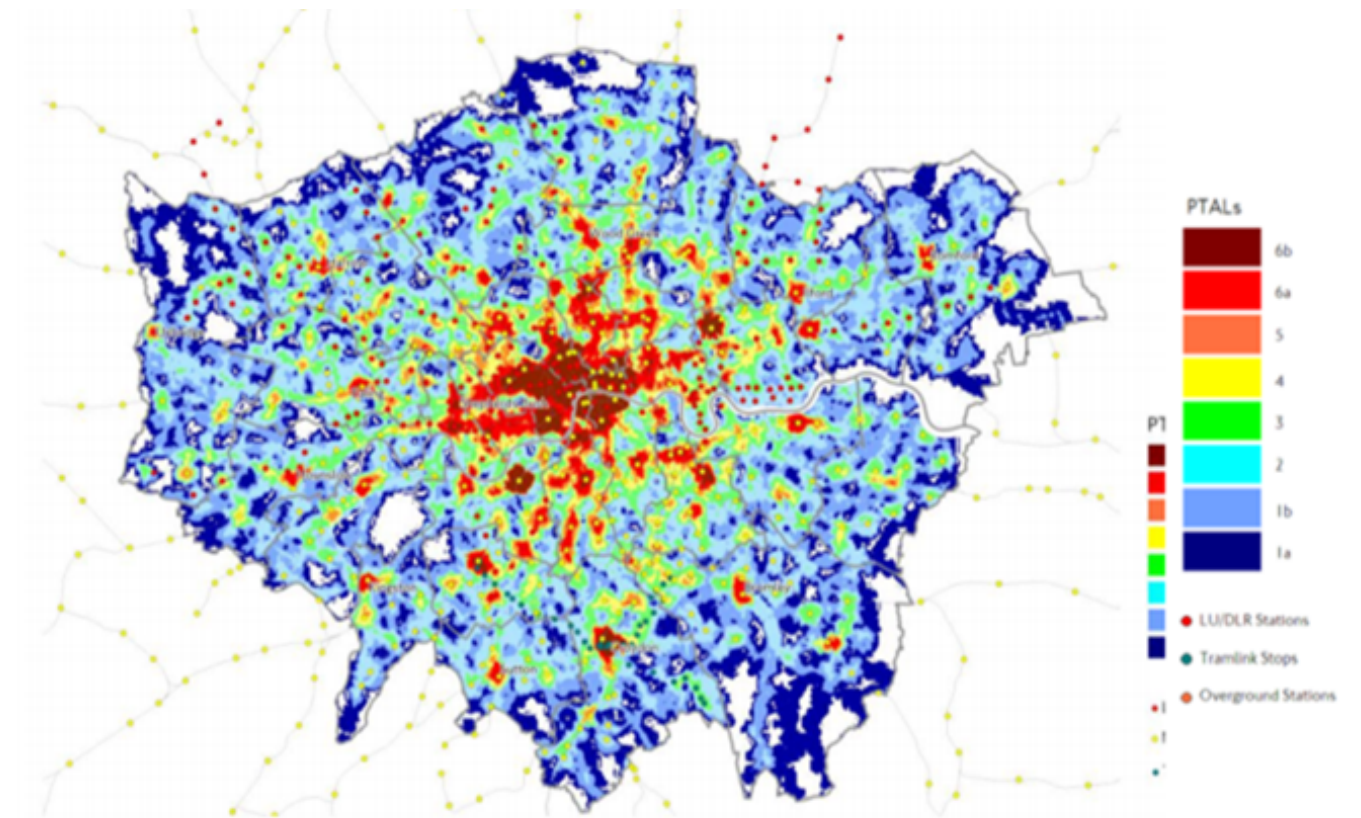
Strategic Industrial Locations (SIL) are important in supporting the logistics system and related infrastructure. They are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses. The majority of SILs are over 20 hectares in size. However industrial land is currently being released at almost three times the recommended amount.

### 5.8 Connectivity and accessibility

Transport issues will be principally addressed in the review of the Mayor’s Transport Strategy, which is being undertaken in parallel to this review.

Almost 800,000 people commute into London for work, and it is estimated to rise to more than one million by 2041. London benefits from a well-developed public transport network. Connectivity to this network is measured by using the Transport for London’s (TfL) Public Transport Access Level (PTAL). The spread of PTAL scores is shown in Figure 8.

Figure 8: Public Transport Access Level (PTAL) distribution



Source: TfL Planning, Strategic Analysis.



The use of public transport has increased by 36% between 2001 and 2014, compared with a 21% decrease in car journeys per head over the same period.

Overcrowding on public transport is a concern. In 2009 it was reported that the most overcrowded trains carried 40% more passengers than they should have been during peak rush hour. Employment growth in London is placing significant pressure on public transport networks, with a million-additional daytime public transport trips expected by 2041.

In 2014, over 615,000 journeys each day were made by bike. Between 2008 and 2014, cycling on roads across London rose by 31.9%. Walking accounts for 30% of all trips made by Londoners, and two thirds of trips under a mile. It is the most common form of transport for shopping and school/college. By 2041 it is expected there will be 8 million 'walk all the way' trips.

Of the 270 functioning stations across TfLs Underground and Overground network, 67 tube stations and 56 Overground stations have step-free access, including all DLR stations. All new stations, such as those on the Elizabeth Line, will have step-free access.

## 5.9 Economic competitiveness

London's total economic output in 2014 (measured as Gross Value Added (GVA)) was £364 billion, comprising 22.5% of the UK's total economic output, an increase of 6.8% on the previous year. London's economy has grown on average by 2.4% per annum in real terms between 2006 and 2014.

London has large clusters of economic activity, particularly in the CAZ and the northern part of the Isle of Dogs. It is calculated that the output of these areas and a 1km fringe around them stood at just over £188 billion in 2014, accounting for nearly 52% of London's output and just under 12% of UK output from an area of land covering just 0.03% of the UK.

In terms of digital connectivity, London had the highest average download speeds of all UK regions at 27.3mbps. It is estimated that 89% of London is able to opt for superfast broadband (24mbps).

The evening and night-time economy is a key aspect of the London economy. In 2013-14 approximately 1100 premises held a 24-hour licence in London. Almost 40% of these were in five boroughs: City of London, Westminster, Islington, Lambeth and Haringey. The opening of the night tube in August 2016 is predicted to add £77m per year to the value of London's night-time economy.

## 5.10 Employment

In 2016 London had a total of 5.7 million workforce jobs. This is projected to grow to 6.7 million by 2041, equivalent to 46,000 net additional jobs per annum. Almost a third of London jobs are based in the CAZ, and along with Canary Wharf, the CAZ experiences the highest rate of employment growth in London.

Outer London also contains significant levels of employment. Hillingdon had more than 200,000 workforce jobs in 2015 and Hounslow, Barnet, Ealing, Croydon, Brent, Enfield and Bromley all had more than 100,000. Much of this employment is focused in town centres/retail parks, business parks, industrial locations and in health/education capacities. Employment in outer London boroughs is expected to grow by more than 350,000 between 2015 and 2041.

Professional, scientific and technical activities is the largest sector of employment in London, accounting for 13.6% of total jobs. London's employment profile has changed over the past 15 years, with a decline in manufacturing jobs, and a rise in professional services, health and education.

In 2015 London had an employment rate of 72.9%, marginally lower than the national average of 73.5%. This rate varies between groups. Parents, particularly mothers, have significantly lower employment rates in London (59.9%) than the rest of UK (68.8%).

Employment rates for disabled and Black Asian Minority Ethnic (BAME) groups in London were marginally higher than the rest of the country, 50.1% in London compared to 49.2% nationally for disabled people and 64.9% in London compared to 62.9% nationally for BAME groups.

In 2014 there were 283,000 unemployed adults in London, with an unemployment rate at 6.1%, somewhat higher than the national average of 5.3%. The unemployment rate for ethnic minority background was lower in London (9.2%) than the national level (9.5%). Barking and Dagenham had the highest unemployment rates of 10.4%, but this has been steadily falling since 2012, and Richmond upon Thames had the lowest rate at a steady 4.6%.

Self-employment accounted for 14% of total jobs in London and the UK in 2014. The number of people in part-time work is 22%, but this is still below the UK average of 25%. The figure is much higher for females, at around 33% compared to 12% of males.

In 2014 the median gross hourly wage was £17.16 for full time jobs. However, 20% of the capital's workforce was paid below the London Living Wage (£9.15 per hour in 2013). Low pay disproportionately affects younger workers. Nearly 50% of workers age 19-24 were paid less than the London Living Wage in 2015.

Between October and December 2015, 801,000 people were in employment on zero hour contracts, with a high proportion of female, young or older age groups. Accommodation, food, health and social work, elementary, caring and leisure services were the most prone sectors to use zero hour contracts.

## 5.11 Education and skills

London's school age population is projected to reach nearly 1.4million by 2041, up from 1.2million in 2014. In January 2015, there were 3119 schools of London, of which 1800 were state funded primary schools and 479 state funded secondary schools. London has 555 independent schools, the highest of any region. Between 2014 and 2024, demand for state funded primary school places is projected to increase by 60-67,000 pupils and 105-122,000 for state funded secondary schools. Over 600 new schools and colleges will be needed in the years up to 2050 to meet this demand.

There are approximately 620,000 pre-school aged children in London (0-4 years). Childcare in London is 34% more expensive than the rest of the country.

In 2014/15 59% of pupils in inner London and 62% in outer London achieved five A\* to C grades (including Maths and English) at GCSE Levels, compared with 53% across the rest of England. However, educational achievement varies between boroughs, ranging from 51.3% in Lewisham, to 73% in Kensington and Chelsea.

London is home to more than 40 universities and specialist higher education institutions. Approximately 370,000 students studied at London higher education institutions in 2014/15, 16% of all UK students. Despite a high number of graduates, youth employment is still an issue with a rate of 17.24% for 16-24 years, compared with 14.4% nationally.

Over 57% of Londoners possess NVQ level 4 or higher, compared to 41.6% of the rest of the UK. Approximately 60.2% of workers in London had tertiary education as their highest qualification in 2014. According to the London Business Survey, 70% of businesses in London rated the capital highly as a place to do business due to the availability of skilled staff. London attracts a higher proportion of EU-born workers compared with the rest of UK to filled skilled positions. This may be affected by the 2016 EU referendum outcome.

## 5.12 Culture

In 2012 the GVA of creative industries in London was estimated to be at £24.6 billion, accounting for 47.6% of the UK total. London's creative industries specialise in music, performance and visual arts (75% of total UK GVA generated in London), and film, TV, video, radio and photography (66.4% of total UK GVA generated in London). In 2014, there were 795,800 jobs in the creative economy. 80.2% of these jobs were filled by white ethnicity groups, compared to 19.8% filled by BAME groups.

Culture is the reason four out of five visitors choose to visit the capital. 31.5m national and international visitors visited London in 2015, a record year. In 2013 the GLA estimated that cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London.

London has 857 art galleries, 241 theatres, 860 cinema screens, ten major concert halls, 13 national museums, 339 night clubs, four UNESCO world heritage sites and 353 public libraries. Many of London's cultural facilities and spaces are heritage assets. 84% of Londoners are satisfied with the city's cultural scene. However, cultural participation is relatively low among London residents, particularly those from low socio-economic backgrounds. Amongst BAME groups, 43% were likely to have visited a museum or gallery compared with 53% amongst white ethnic groups.

However, there is evidence to suggest that London's cultural infrastructure is reducing. Over 103 grassroots music venues have been lost in the last eight years and pubs are closing at a rate of ten per week. Funding for the arts has also undergone significant cuts, with the average spend by councils on cultural services falling by 24% between 2010/11 and 2013/14.

## 5.13 Air quality

In 2014, 39 of the 67 measured sites across the city did not achieve the annual mean objective for NO<sub>2</sub>, and 8 sites recorded an annual mean twice the legal limit or above. Exposure to NO<sub>2</sub> has been declining, but it is estimated that by 2020, 500,000 people will still be exposed to NO<sub>2</sub> levels above the EU limit value. People living in the most deprived areas are disproportionately exposed to poorer air quality than those in less deprived areas. NO<sub>2</sub> levels in 51% of the 10% most deprived lower super output areas (LSOAs) in London were on average 1% above the limit value.

## 5.14 Climate change

Since 1990 London's CO<sub>2</sub> emissions have fallen by 16%, attributable to reduced gas use, low carbon national electricity supply and a shift towards the less-energy intensive service sector rather than . This reduction is substantial considering the rapid population increase in the city, and per capita emissions have reduced by 24% since 1990, equating to 4.4 tonnes per person per year.

In 2014, 35% of emissions were generated from London's homes, 42% from workplaces and 23% from transport. The vast majority of greenhouse gases (GHGs) are from the heating and powering of buildings. Of transport's contribution to CO<sub>2</sub> emissions, cars make the greatest contribution, followed by heavy good vehicles (HGVs) and busses. London is not currently forecast to reduce emissions target of 60% of 1990 levels by 2025.

London is expected to face increase risks from flooding, drought and heat due to climate change. The Urban Heat Island (UHI) effect can result in the centre of London being up to 10°C warmer than its surroundings. In the absence of measures to address urban heat risk, heat-related deaths would be expected to rise by around 257% by 2050 from a current annual baseline of around 2,000 deaths.

## 5.15 Energy use and supply

London consumed an estimated 133,960 GWh of energy in 2014, a 17% reduction on 1990 levels of energy use despite a population increase of 26% over this period. 40% of the 2014 energy use was consumed in London's homes, 36% from London's workplaces and 24% in the transport sector.

Gas consumption makes up 48% of the total energy consumed in London in 2013, and electricity consumption accounted for 29%. However, because of its high carbon intensity, carbon accounted for a proportionally larger amount of London's CO<sub>2</sub> emissions. In 2014 renewable energy generation was 640GWh, predominantly from municipal waste combustion plants. London also has one of the lowest solar installation rates in the UK.

## 5.16 Water resource and quality

Every London borough contains some element of London's strategic network of water spaces. 17 boroughs border the Thames and 15 contain canals. Water resources are under pressure with a risk of drought if there are two consecutive dry winters.

Within London there are 64 waterbodies. The River Basin Management Plan measures water quality in these bodies, and of the 64, none are rated as 'very good' (Table 10). Poor water quality has been attributed to the numerous wrongly corrected sewers and storms in outer London washing unwanted debris and litter.

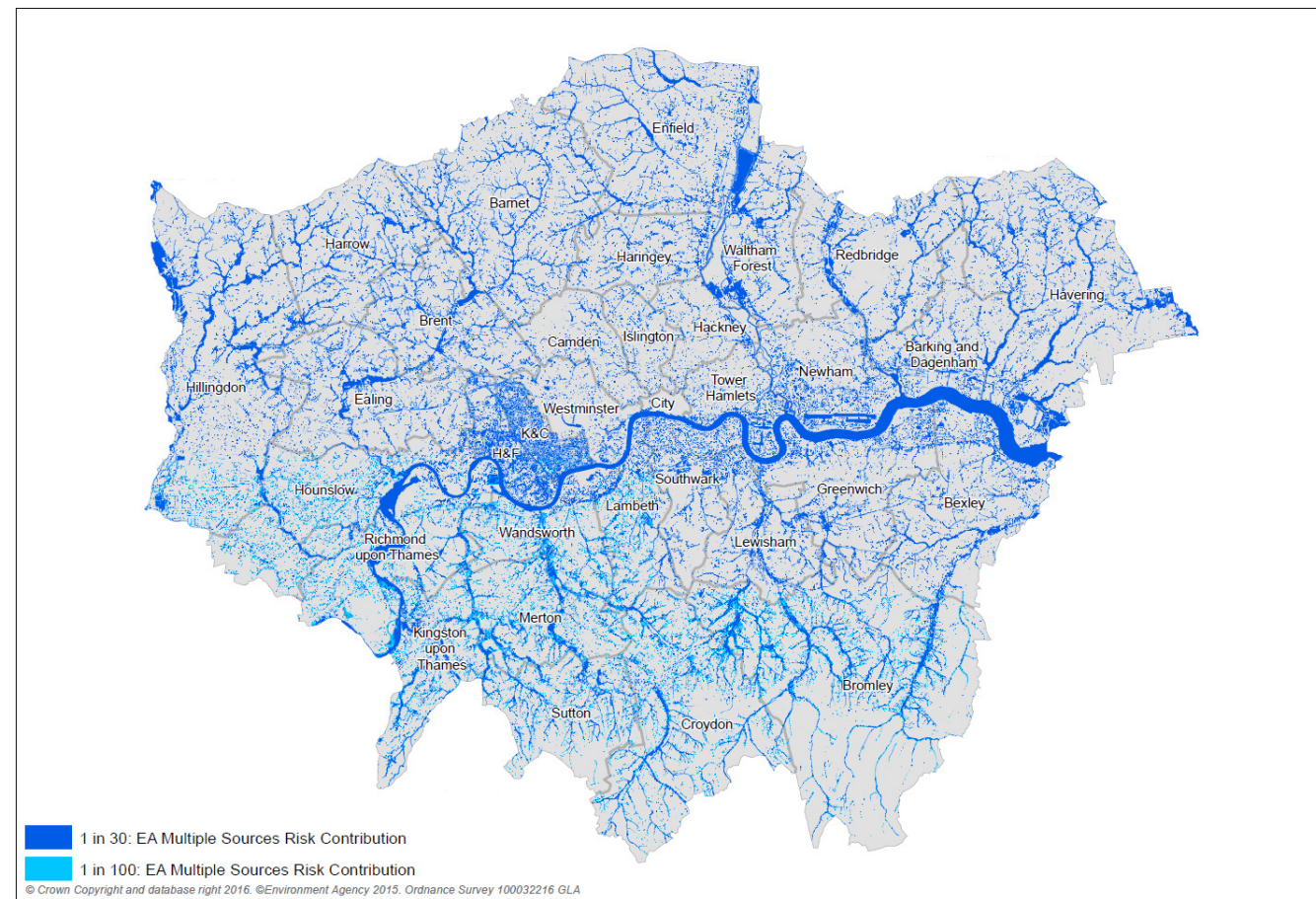
Table 11: Quality of waterbodies in London

Status of London waterbodies	Number of waterbodies
Bad	3
Poor	10
Mod	50
Good	2
Very Good	0

### 5.17 Flood risk

There are many sources of flooding in London, including tidal, fluvial, surface water, ground water, sewer and reservoir. 6% of London is at risk of surface water, tidal and fluvial flooding for a 1 in 30 year event, with 11% of London at risk from the same sources for a 1 in 100 year event. Many parts of London’s brownfield areas are at risk from flooding, including 13% of Opportunity Areas for a 1 in 100 year event (Figure 9).

Figure 9: Flooding from multiple sources<sup>8</sup>



<sup>8</sup> GLA, 2017- EA Flooding From Multiple Sources in the Greater London Authority

### 5.18 Natural environment and natural capital

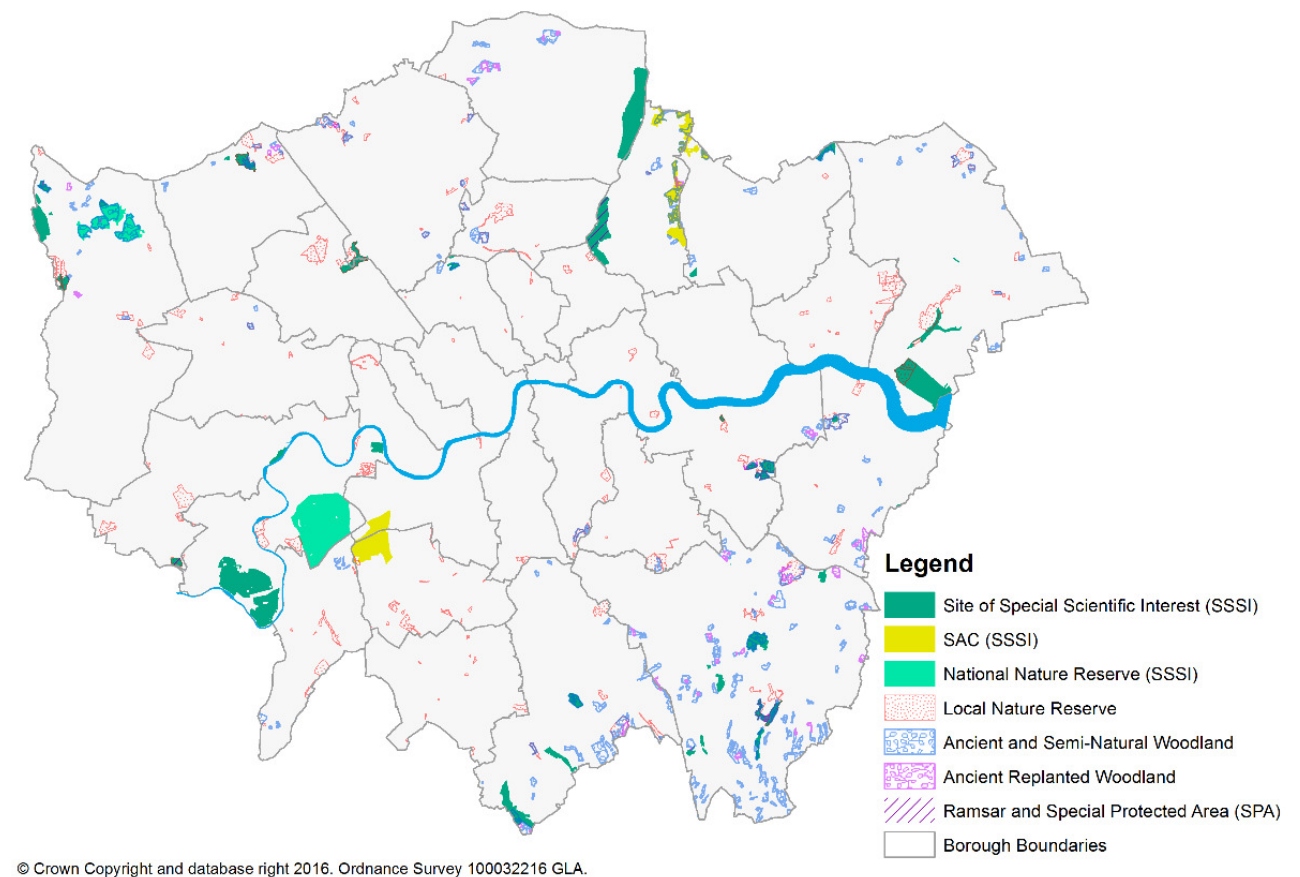
Two-thirds of London’s land area is occupied by green spaces and water. Of this, approximately one third are private gardens, another third parks or sports use and the remaining third is semi-natural habitat, such as grasslands or rivers.

London has numerous statutorily designated nature conservation sites and priority habitats, as shown in Figure 10.

Sites of Importance for Nature Conservation (SINCs) are recognised for their wildlife. In total there are 1400 SINCs, covering nearly 20% of the capital. SINC coverage has increased since 2002 but there have been losses across London at specific sites. SINCs also require constant management. In 2011 59% of SINCs were under positive conservation management.

In terms of private gardens, between 1999 and 2008, the area of vegetated garden declined by 12%, the amount of hard surfacing increased by 2.6% and the amount of lawn decreased by 16%.

Figure 10: Designated sites across London



© Crown Copyright and database right 2016. Ordnance Survey 100032216 GLA.

London’s accessible green spaces make up about 16% of the capital.

Table 12 shows the percentage of London deficient in access to open space; in total 86% of Greater London is deficient in access to at least one type of public open space.

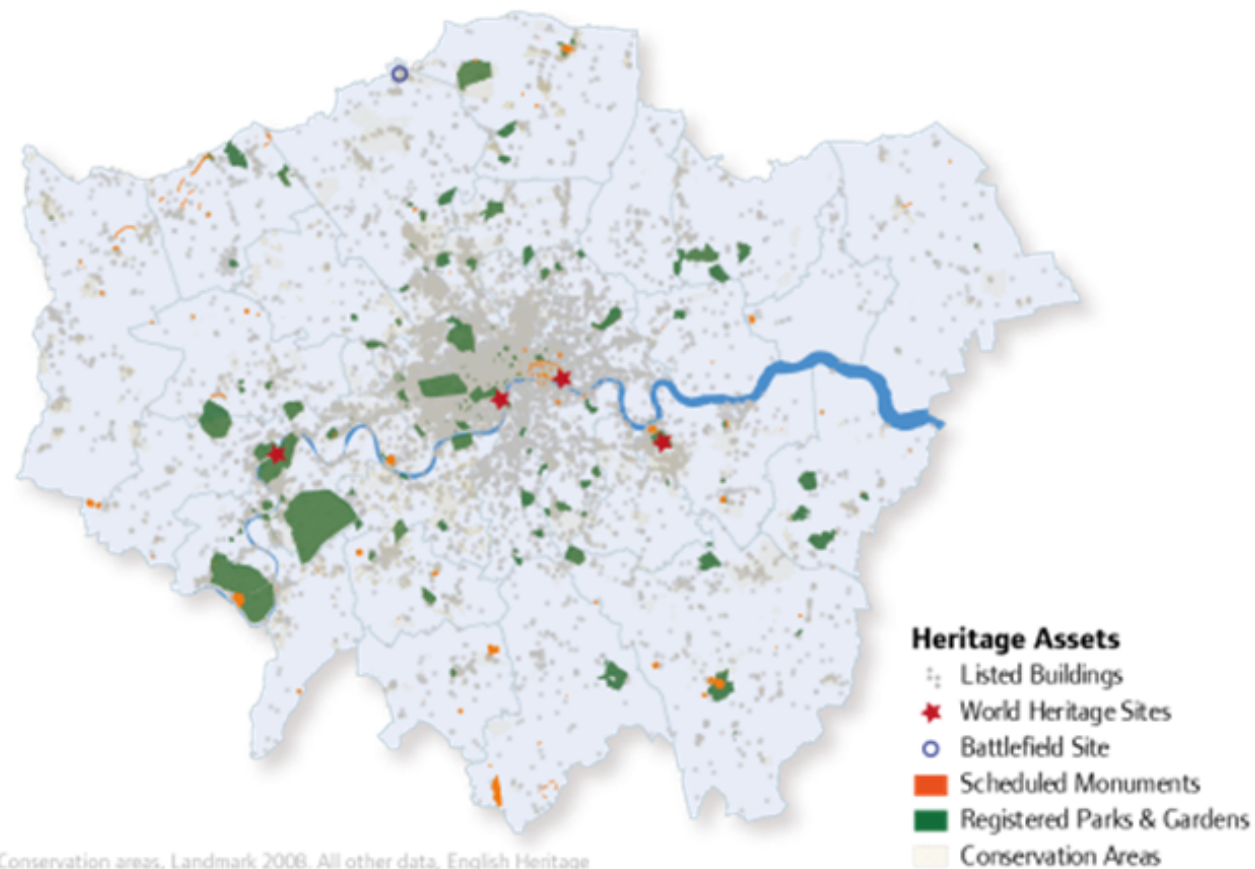
Table 12: Areas in London deficient in access to open space

London Plan Bench Marks	Percentage of area deficient in access to publically open space
>8.0km away from Regional Parks	65% of Greater London
>3.2km away from Metropolitan Parks	26% of Greater London
>1.2km away from) District Parks	45% of Greater London
>400m away from) Local, Small and Pocket Parks	50% of Greater London

### 5.19 Historic environment

London has a variety of designated assets including four UNESCO World Heritage Sites, 199 scheduled monuments, one registered battlefield, 150 registered parks and gardens and 18,912 listed buildings (Figure 11).

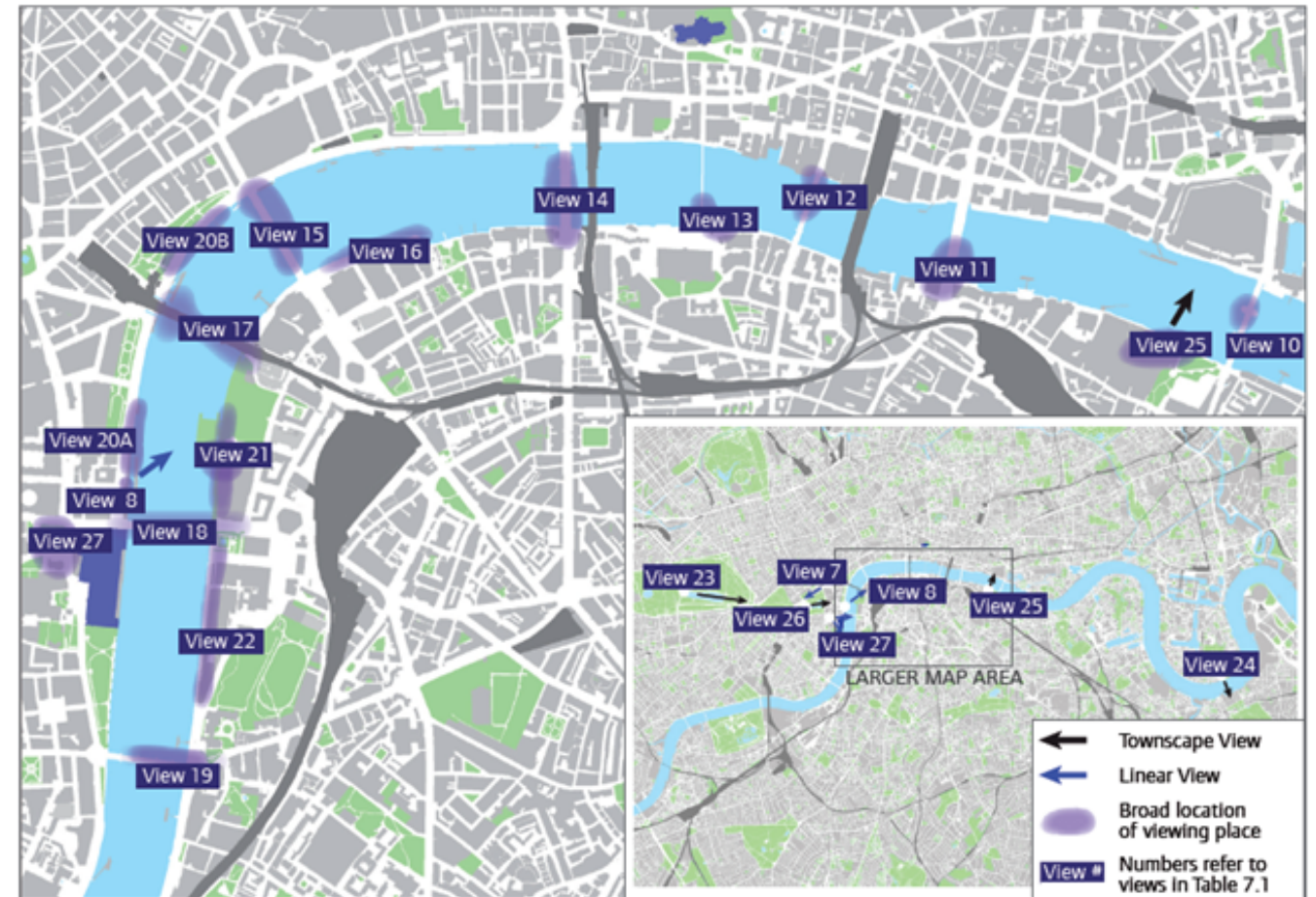
Figure 11: Heritage assets across London



There are 27 designated views identified in the existing London Plan which include significant buildings or urban landscape that define London at a strategic level, the majority of which are focused along the river Thames (Figure 12).

In 2015 62 conservation areas, 492 listed buildings, 31 scheduled monuments and nine registered parks and gardens were at risk of neglect or decay, making up 12.2% of the national total of at-risk designated assets.

Figure 12: Strategic views in London



### 5.20 Geology and soils

London has a range of distinctive natural landscapes shaped by geological processes, such as undulating chalk downlands in south London and the river terraces in the north. London’s geological sites are protected through designations including Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) or Locally Important Geological Sites (LIGs). There are seven geological SSSIs in London, four of which are in favourable condition and three in unfavourable.

Some soils in London have high levels of contamination from substances that are legacy of former industry, such as old gas works, landfills or chemical plants. This is a particular issue for some of London’s larger brownfield sites which require redevelopment. Risk of soil degradation is also increasing, particularly during the construction of new developments and infrastructure.

## 5.21 Material and waste

In 2012 London produced approximately 15 million tonnes of waste. 20% was local authority collected waste ('household waste'), 32% was commercial and industrial waste and 48% was construction, excavation and demolition waste.

In 2012 it was identified that London dealt with almost half of its own waste within its boundaries. 7.97mt of waste was exported out of the capital, 49% of which was sent to landfill in the South East and East of England.

London's recycling rates have increased from 2002, reaching 30% in 2012 where they have remained steady. This falls below the target of 45%. London has the lowest recycling rate across all regions in England, with a national average of 44%. The mayor has set a target of 65% recycling rate by 2030, with major improvements needed to meet this. London transitioning to the circular economy through waste reduction and significant improvement in reuse and recycling performance could bring £7b of benefits to London and generate 12,000 new jobs by 2036.

## 5.22 Noise and vibration

In London two million people (42%) are exposed to more than 55dB Lden, just below 57dB which represents an 'onset of significant community annoyance'. The main sources of ambient noise is road traffic, followed by rail. Other activities such as construction, busy high streets and vibrant night-time economy also impact noise levels. Table 13 highlights the number of people in London exposed to roadside and railway noise.

Table 13: Number of people exposed to roadside and railway noise (2011)

Type	>55dB	>65dB	>75dB
Roadside	2,378,200	1,027,200	99,200
Roadside – night	1,665,400	649,400	900
Railway	252,200	158,100	15,200
Railway – night	388,700	95,100	6,400

Aviation noise also affects Londoners, with a 2013 TfL report noting that 766,100 people lived within  $\geq 55$ Lden contour of Heathrow and at least another 17,800-people living within the  $\geq 55$ Lden contour of London City airport.

## 6 Key sustainability issues

Following the review of relevant plans, programmes, strategies and objectives and assessment of baseline information, a number of key issues were identified through the IIA process which helped to develop the new London Plan (Table 14).

Table 14: Key sustainability issues in London

Topic	Key Issues	Evolution in the absence of the new London Plan
Demographic Change	<ul style="list-style-type: none"> <li>Significant increase in the population</li> <li>Young profile</li> <li>Ageing and more diverse population</li> <li>Uncertainty of the composition of the population, including migration patterns</li> </ul>	Increase in population and its composition will lead to increased pressure and competition for land for different types of development.
Social Integration and Inclusion	<ul style="list-style-type: none"> <li>Increasing aging and diverse population</li> <li>Persistent causes of Multiple Deprivation</li> <li>High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels</li> <li>Discrimination</li> <li>Isolation</li> <li>Population churn and impact on community cohesion</li> <li>Gentrification</li> </ul>	<ul style="list-style-type: none"> <li>Benefits / disbenefits of growth will affect groups of people differently.</li> <li>Wealth distribution in London likely to become more polarised based on trends</li> </ul>
Health and Health Inequalities	<ul style="list-style-type: none"> <li>Increasing health inequalities across the population</li> <li>Londoners are living with complex health needs for longer period</li> <li>Increasing and changing pressure on the health services and service provision</li> <li>Differentials in life expectancy and healthy life expectancy across London</li> <li>Widening social inequalities</li> <li>Low levels of physical activity and increasing obesity levels across the population</li> </ul>	<ul style="list-style-type: none"> <li>Obesity is a growing problem and is likely to continue.</li> <li>Increased pressure on the health sector to deal with complex health needs.</li> </ul>
Crime, Safety and Security	<ul style="list-style-type: none"> <li>Increased threat of major incidents and unplanned events</li> <li>Perceptions of lack of safety</li> <li>Fear of crime creating barrier to activities leading to increased social isolation</li> <li>Vulnerability of different groups of people at greater risk of crime</li> <li>More vibrant night-time economy leading to increased risk of crime</li> </ul>	<ul style="list-style-type: none"> <li>Social isolation of some groups are likely to increase as their perception or fear of crime or anti-social behaviour will make them reluctant to go out and use facilities, services, including shops, green spaces, libraries, etc. or the public transport, particularly at certain times of day.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Lack of affordable housing</li> <li>Under-supply of homes which meet the needs of Londoners (size, type, tenure)</li> <li>High level of approvals, low level of completions</li> </ul>	The challenges to meet housing demand (including size, type, tenure) are likely to increase.

Topic	Key Issues	Evolution in the absence of the new London Plan
	<ul style="list-style-type: none"> <li>Increasing costs of housing relative to wages</li> <li>Homelessness</li> <li>Implications from major Government reforms to housing legislation and policy</li> </ul>	
Sustainable Land Use	<ul style="list-style-type: none"> <li>Inability for London to accommodate required growth within its boundaries</li> <li>Unsustainable patterns of development within and across London's boundaries</li> <li>Higher densities development</li> <li>Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure</li> <li>Non-efficient use of land</li> <li>Integration of land use and transport</li> <li>Spatial impact and consequential development pressures resulting from decision on London's future airport capacity</li> </ul>	Pressure for development and competition between different uses will increase, potentially leading to unsustainable patterns of use.
Connectivity	<ul style="list-style-type: none"> <li>Poor orbital connectivity by all modes of public transport in outer London</li> <li>Poor connectivity across the River Thames in east London</li> <li>Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads</li> <li>Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths</li> <li>Increasing airport capacity will impact on the spatial and economic fabric of the city</li> <li>Deficiencies in access to open space</li> <li>Poor connectivity to green infrastructure for all</li> </ul>	The issues of poor connectivity are likely to deteriorate further as a result of increased development or pressure on the transport system or public realm.
Accessibility	<ul style="list-style-type: none"> <li>Poor design of the built environment</li> <li>Barriers to using public transport</li> </ul>	Accessibility of the built environment and public transport may not improve or could deteriorate.
Competitiveness	<ul style="list-style-type: none"> <li>Changing global economy</li> <li>London's Productivity</li> <li>Potential loss of agglomeration benefits</li> <li>Increased pressure on London's infrastructure as a result of growth and increased economic activity</li> <li>Risk that infrastructure could constrain economic growth</li> <li>Lack of high speed and efficient connectivity (digital) across all parts of London</li> <li>Loss of employment land as a result of increased pressure for housing</li> </ul>	Without investment in London's infrastructure and land use policies to ensure the sufficient provision of employment and business space in terms of type, location and cost, there is a threat to London's position as a leading global city as well as the ability of local economies to serve local populations.

Topic	Key Issues	Evolution in the absence of the new London Plan
	<p>Insufficient amount of floorspace available to meet identified needs</p> <p>Affordability of business space, particularly for small and medium sized enterprises and start-ups</p> <p>Impact of mixed use development – night-time economy and residents</p> <p>Impact on town centres as a result of a reduction in demand for retail floorspace</p>	
Employment	<p>Disparities between rates of employment among London's residents</p> <p>Disparity between wages and cost of living</p> <p>Lack of diversity in jobs provided</p> <p>Growth of low paid employment and zero hours contracts</p>	<p>Disparities between wages and cost of living and lack of diversity in jobs could be a further threat to the resilience of the London economy and objectives to provide opportunities for all.</p> <p>There may also be impacts on to London's competitiveness in terms of its ability to attract a flexible labour force.</p>
Education and Skills	<p>Insufficient school places to meet growing needs</p> <p>Large variations in educational performance across London</p> <p>Lack of support for transition from education to work, especially for young women</p> <p>Maintaining London's status as an international city of learning, research and development</p>	<p>Inability of Londoners to access jobs may compromise London's economic competitiveness</p> <p>Lead to increased levels of social deprivation and poverty.</p>
Culture	<p>Loss of pubs, cinemas, creative workspace, live music and other cultural facilities and risk of harm to heritage assets</p> <p>Increased appropriate production space needed for the creative industries to thrive and develop</p> <p>Inequality in access to cultural venues</p> <p>Low levels of participation</p> <p>Regulation/bureaucracy stifles creativity / talent development</p> <p>Lack of community led engagement in planning and development schemes for local area</p> <p>Despite the wide ranging economic and social benefits it brings, culture is a low priority on national and local development agendas.</p>	<p>Continued loss of culture infrastructure leading to reduced provision and participation.</p>
Air Quality	<p>High levels of NOx, PM10 and PM2.5 emissions from road transport</p> <p>Little to no predicted reduction in PM10 and PM2.5 emissions from road transport between 2013 and 2030</p> <p>London is not compliant with legal limit values for NO2</p> <p>Large numbers of the population are exposed to levels of NO2 above the EU limit value</p>	<p>Without additional measures to tackle the issue of air quality, London will continue to be non-compliant with legal limits with higher levels of exposure to pollutants.</p> <p>Increasing economic growth and development will lead to increased emissions from construction, buildings,</p>

Topic	Key Issues	Evolution in the absence of the new London Plan
	<p>Exposure to poor air quality is unequal across London and some areas are more exposed to poor air quality than others</p> <p>The health impacts of air pollution include: an increased risk of early death as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD.</p>	<p>car use and congestion leading to localized air quality issues.</p>
Climate Change	<p>London is not currently meeting the Mayor's CO2 emission target</p> <p>Transport will continue to contribute significantly to CO2 emissions</p> <p>CO2 emissions from buildings continue to rise</p> <p>London is no longer a global leader in terms of transitioning towards a low carbon economy</p> <p>Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts</p> <p>Changing demographics such as an ageing population and more under five year olds increasing the number of potentially vulnerable people.</p> <p>Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect</p>	<p>The Mayor's CO2 emissions targets are likely not be met if additional reduction measures are not put in place by the London Plan and other Mayoral strategies.</p> <p>Climate change effects will continue including increased temperatures, potential droughts, severe storms and flooding.</p> <p>The effects of climate change will not be experienced equally among London's population and are likely to increase existing inequalities.</p>
Energy Use and Supply	<p>Relatively high and ineffective use of fossil fuels contributing towards London's GHG emissions and air pollution</p> <p>Insufficient low carbon energy supply</p> <p>High number of Londoners in fuel poverty.</p> <p>Energy-inefficient building stock &amp; transport.</p> <p>Un-utilised local energy resources</p> <p>Need to manage peak electricity demand</p>	<p>Without additional measures energy use is likely to increase – reducing London's sustainability.</p>
Water Resources and Quality	<p>Need to reduce per capita water consumption</p> <p>Need to plan for and deliver additional new water resources</p> <p>Need to improve the quality of water in London's waterbodies</p> <p>Need to improve the physical form of London's waterbodies</p> <p>Need to improve sewer and wastewater infrastructure capacity</p>	<p>Increase in demand for water and deterioration of water quality.</p>
Flood Risk	<p>Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir</p> <p>Increase in run-off and potential contamination and disruption of flows</p> <p>Necessary infrastructure needs to be planned for, funded and implemented to support growth and development</p>	<p>Without the new London Plan, the strict criteria it sets out, and the weight it attaches to London's flood management plans delivery and investment, that the number of people/properties at risk will increase.</p>

Topic	Key Issues	Evolution in the absence of the new London Plan
Natural Environment and Natural Capital	<p>Loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development</p> <p>Decrease in Areas of Deficiency in Access to Nature and increased recreational pressure on existing habitats and green spaces</p> <p>Impact of climate change and threat of new pests and diseases</p>	<p>Increased development pressure will reduce the amount of green space available and reduce the quality of existing - with no funding / investment).</p> <p>There will be an increase in air pollution hence causing indirect negative effects on air and water quality leading to deterioration of natural and built environment.</p>
Townscape and Landscape	<p>Poor quality public realm in some parts of London which can discourage active travel</p> <p>Deficiencies in open spaces in some parts of the city</p> <p>Risk of poor design, harm to the distinctive character of places lack of legible neighbourhoods and sense of place</p>	<p>Design challenges of the built / natural environment / public realm may not be effectively addressed.</p>
Historic Environment	<p>Heritage assets at risk from neglect, decay, inappropriate development and air pollution</p> <p>Views and vistas to heritage assets are at risk from increased development pressures</p> <p>Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.</p>	<p>Heritage assets are likely to continue to be preserved through legislation. However it is their settings which will continue to be most at risk from increased pressure for development.</p>
Geology and Soils	<p>Threat to London's geodiversity as a result of increased demand for development</p> <p>Modifications to the landscape and subsequently geomorphological processes</p> <p>Remediation of contaminated land</p>	<p>Greater impacts on geology and soils from development.</p> <p>More innovative solutions to reduce the impact of the costs of remediation are also needed.</p>
Materials and Waste	<p>Increasing pressure on waste sites and infrastructure including wharves in London to meet demand</p> <p>Wasteful economy increasing disposal costs and climate change impact</p> <p>Low municipal waste recycling rate and inconsistent recycling service provision falling short of stretching recycling targets</p> <p>Fragmented waste governance resulting in inconsistent recycling service provision and performance across London</p> <p>Likely increase in waste arisings in particularly construction materials to meet the needs of London's growing population</p>	<p>The amount of materials and waste produced is likely to increase with increased population / growth and no additional measures to help reduce it.</p>
Noise and Vibration	<p>Parts of the population are exposed to roadside and railway noise that exceeds the threshold</p> <p>Increasing noise levels from night-time economy, freight movement and deliveries associated with mixed use development</p>	<p>There is likely to be an increase in the population exposed to noise or noise related activity.</p>

Topic	Key Issues	Evolution in the absence of the new London Plan
	Lack of quiet and tranquil places for relaxation and enjoyment	



## 7 IIA Framework

### 7.1 Establishing the IIA Framework

An important element of the IIA process is the determination of IIA objectives. An objective is a statement of what is intended, specifying a desired direction of change. The achievement of objectives is normally measured by using indicators and need to be specific and measurable.

IIA objectives are used to show whether the objectives of the London Plan are beneficial for the achievement of sustainable development, to compare the sustainability effects of alternatives, or to suggest improvements.

An objectives-led approach is considered to be most appropriate to assessing the London Plan as it enables assessment of the extent to which each aspect of the London Plan contributes towards delivery of each objective as opposed to just meeting prescribed targets. Thus a more qualitative approach is adopted that allows for a better identification and description of effects rather than attempting to assign a quantitative value, which is more limited and restrictive at this strategic level.

Draft IIA objectives have been developed in accordance with:

- The findings from the review of relevant plans and programmes and the baseline data;
- Consultation within the GLA (Steering Group); and
- Feedback from key stakeholders following a workshop held in June 2016.

IIA objectives align with wider international, national and local environmental, health, social and economic policy objectives and form the basis of what the new London Plan and other Mayoral strategies will be appraised against.

It is intended that the IIAs for all Mayoral strategies will be assessed against the same IIA objectives, with guide questions being different and relevant to the strategy being assessed.

During the preparation of each of the individual strategies, it may be determined that particular objectives are scoped out as they are deemed as not being applicable to the scope and intent of the strategy. In addition, the order of the IIA objectives may vary between the IIAs of the strategies to reflect the structure of the baseline for that particular strategy.

Alongside each IIA objective is a set of guide questions that will be used to assess whether the London Plan will help to achieve or conflict with the objective.

Guide questions are coloured to indicate which of the assessment elements of the IIA the question addresses in order to fully demonstrate how these assessments have been integrated as part of the IIA and to ensure that the relevant aspects of specific assessments are easily navigable.

A total of 24 IIA objectives have been derived for the assessment of the new London Plan. Figure 8.2 below shows the link between SEA Directive issues and IIA objectives (detailed list of the IIA objectives is presented in Table 16).

Table 15: Link between SEA topics and IIA Objectives

SEA Directive Topic	IIA Objective(s)
Material Assets	5, 6, 11, 23
Climatic Factors	14, 15, 16, 17, 19
Biodiversity	20
Fauna	20
Flora	20
Water	18
Soil	22
Air	14
Cultural heritage, architectural and archaeological heritage	13, 21
Landscape	7, 21
Population	1, 2, 3, 9, 10, 11, 12
Human health	1, 2, 3, 4, 8, 24

Table 16: The IIA Framework – objectives and key guide questions

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
Equality and inclusion	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	<ul style="list-style-type: none"> <li>• Reduce poverty and social exclusion?</li> <li>• Promote a culture of equality, fairness and respect for people and the environment?</li> <li>• Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?</li> </ul>
Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	<ul style="list-style-type: none"> <li>• Provide opportunities for people to choose an active, fulfilling life?</li> <li>• Provide opportunities for Londoners to actively participate in the city's life, decision making and communities?</li> <li>• Provide opportunities for Londoners of every background to connect?</li> </ul>
Health and Health Inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	<ul style="list-style-type: none"> <li>• Improve access and equity of access to health and social care services and facilities?</li> <li>• Reduce differentials in life expectancy and healthy life expectancy across London?</li> <li>• Promote increases in physical activity, particularly in areas of health and social deprivation?</li> <li>• Reduce inequalities in levels of physical activity?</li> <li>• Improve the physical and mental health and wellbeing of communities?</li> <li>• Support the provision of quality, affordable and healthy food?</li> <li>• Reduce inequalities in physical and mental health and wellbeing?</li> </ul>
Crime, safety and security	To contribute to safety and security and the perceptions of safety	<ul style="list-style-type: none"> <li>• Reduce levels of crime?</li> <li>• Reduce the opportunity for crime and antisocial behaviour?</li> <li>• Create a travel environment that feels safe to all users during the day time and night-time?</li> <li>• Increase security and resilience to major incidents?</li> <li>• Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?</li> </ul>
Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand	<ul style="list-style-type: none"> <li>• Help to facilitate the delivery of house building that meets the needs of Londoners?</li> <li>• Reduce homelessness and overcrowding?</li> <li>• Increase the range and affordability of housing?</li> <li>• Promote accessible and adaptable homes, improving choice for people who require them?</li> <li>• Provide housing that encourages a sense of community and enhances the amenity value of the community?</li> <li>• Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health?</li> </ul>
Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	<ul style="list-style-type: none"> <li>• Make the best use of land through appropriate development on brownfield sites and use of existing transport network?</li> <li>• Ensure that higher densities development does not adversely impact on different groups of people?</li> <li>• Promote regeneration and provide benefits for existing communities?</li> <li>• Integrate land use and transport?</li> </ul>
Design	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness, reducing the need to travel by motorized transport	<ul style="list-style-type: none"> <li>• Conserve and enhance the townscape/cityscape character?</li> <li>• Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</li> <li>• Help to make people feel positive about the area they live in and promote social integration?</li> <li>• Encourage an inclusive design approach taking into account the needs of a variety of users?</li> <li>• Help to improve the wider built environment and create a sense of place and 'vibrancy'?</li> <li>• Promote high quality design and sustainable design and construction methods?</li> <li>• Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments?</li> <li>• Retain the spatial diversity of communities?</li> </ul>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
Accessibility	To maximise accessibility for all in and around London	<ul style="list-style-type: none"> <li>• Improve accessibility to all public transport modes?</li> <li>• Increase equality of access to services and facilities?</li> <li>• Improve links between areas, neighbourhoods and communities?</li> </ul>
Connectivity	To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes	<ul style="list-style-type: none"> <li>• Improve connectivity by public transport in outer London?</li> <li>• Improve connectivity across the River Thames by all modes of transport, particularly in east London?</li> <li>• Reduce traffic volumes and congestion on roads across all parts of London?</li> <li>• Reduce congestion on public pavements and footpaths, especially in central London?</li> <li>• Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)?</li> <li>• Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> <li>• Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> <li>• Encourage active travel by creating safe, attractive routes?</li> </ul>
Economic competitiveness and employment	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all	<ul style="list-style-type: none"> <li>• Help maintain London as an internationally competitive city?</li> <li>• Increase London's productivity?</li> <li>• Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive?</li> <li>• Help generate satisfying, secure and rewarding new jobs?</li> <li>• Create healthy, productive workplaces?</li> <li>• Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration?</li> <li>• Minimise barriers to employment (e.g. transport, financial, childcare)?</li> <li>• Help reduce overall unemployment, particularly long-term and youth unemployment?</li> <li>• Improve the resilience of business and the economy?</li> <li>• Help to diversify the economy?</li> <li>• Encourage business start-ups and support the growth of businesses, particularly SMEs?</li> <li>• Enable people with physical and mental health conditions and disabilities to stay in employment?</li> <li>• Support working families?</li> <li>• Support social enterprise, voluntary and community sectors?</li> <li>• Support small, local retail offers?</li> </ul>
Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	<ul style="list-style-type: none"> <li>• Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery?</li> <li>• Unlock land that has capacity for housing development?</li> <li>• Provide accessible infrastructure to connect new housing developments to key services?</li> <li>• Ensure equity of access to environmental, social and physical infrastructure?</li> </ul>
Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	<ul style="list-style-type: none"> <li>• Improve accessibility for all to cultural venues</li> <li>• Improve participation by all in cultural activities and support cultural activities that promote social integration?</li> <li>• Provide access to affordable cultural activities in areas of deprivation?</li> <li>• Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector?</li> <li>• Enable Londoners to develop skill and take up careers in the creative industries.</li> </ul>
Education and skills	To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all	<ul style="list-style-type: none"> <li>• Help to improve learning and the attainment of skills to the right employment opportunities?</li> <li>• Ensure provision of sufficient school places to meet growing needs across London?</li> <li>• Support transitions from education to work?</li> </ul>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
		<ul style="list-style-type: none"> <li>Support London's status as an international city of learning, research and development?</li> <li>Encourage education and training that meets the needs of business, including vocational training?</li> <li>Support adult education to improve social mobility and life chances for all ages?</li> <li>Support early year's education and support, particularly in areas of deprivation?</li> </ul>
Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	<ul style="list-style-type: none"> <li>Reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions?</li> <li>Reduce inequalities in terms of access to clean air across London, particularly for those: <ul style="list-style-type: none"> <li>who live in deprived areas?</li> <li>who live, learn or work near busy roads or construction sites?</li> <li>who are more vulnerable because of their age or existing medical condition?</li> </ul> </li> <li>Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals?</li> <li>Reduce the number of people exposed to particulates and NO<sub>2</sub> concentrations, particularly vulnerable people?</li> <li>Help to achieve national and international standards for air quality?</li> <li>Reduce costs to the economy resulting from premature deaths due to poor air quality?</li> </ul>
Climate change adaptation and mitigation	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	<ul style="list-style-type: none"> <li>Protect London from climate change impacts?</li> <li>Improve the micro-climate and ameliorate the impact of the heat island effect on Londoners?</li> <li>Help London to function during a flood event, heavy rainfall or tidal surge?</li> <li>Help London to function during periods of drought</li> <li>Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?</li> </ul>
	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	<ul style="list-style-type: none"> <li>Help to reduce London's CO<sub>2</sub> emission targets by 60% by 2025 meet?</li> <li>Reduce transport's contribution to CO<sub>2</sub> emissions?</li> <li>Reduce the built environment's contribution to CO<sub>2</sub> emissions?</li> <li>Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions?</li> <li>Promote the transition to a low carbon economy?</li> <li>Reduce carbon emissions by shifting to more sustainable modes of transport?</li> </ul>
Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	<ul style="list-style-type: none"> <li>Increase the proportion of energy both purchased and generated from renewable and sustainable resources?</li> <li>Contribute to the provision of smart and affordable energy system for all?</li> <li>Reduce the demand and need for energy?</li> <li>Promote generation of energy locally?</li> <li>Ensure that any supply shortages are addressed?</li> <li>Promote and improve energy efficiency?</li> <li>Promote the transition to a low carbon economy?</li> <li>Reduce impacts of fuel poverty, particularly for vulnerable groups?</li> </ul>
Water resources and quality	To protect and enhance London's water environment by ensuring that London has a sustainable water supply, drainage and sewerage system	<ul style="list-style-type: none"> <li>Improve the quality of the water environment helping to meet the objectives of the Water Framework Directive?</li> <li>Reduce discharges to surface and ground waters?</li> <li>Support necessary improvements to the water systems infrastructure (water supply/ sewerage)?</li> <li>Reduce abstraction from surface and ground water sources?</li> <li>Reduce water consumption through the promotion of demand management?</li> <li>Protect and enhance the character and use of London's riverscapes and waterways?</li> </ul>
Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	<ul style="list-style-type: none"> <li>Minimise the risk of flooding from all sources of flooding to people, property, infrastructure?</li> <li>Manage residual flood risks appropriately and avoid new flood risks?</li> <li>Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?</li> <li>Promote the integration of sustainable urban drainage systems?</li> </ul>
Natural Capital and Natural Environment	To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides	<ul style="list-style-type: none"> <li>Protect and enhance the character of local greenscapes?</li> <li>Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?</li> <li>Help to acknowledge monetary value to natural capital of London</li> </ul>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)
		<ul style="list-style-type: none"> <li>• Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network?</li> <li>• Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance?</li> <li>• Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all?</li> <li>• Promote and support the function of the Blue Ribbon Network?</li> <li>• Specifically address deficiencies in access to open space?</li> <li>• Create green spaces that are safe and accessible to all?</li> <li>• Promote sensory environments and play spaces?</li> </ul>
Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	<ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>• Contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>• Improve the quality and condition of the historic environment?</li> <li>• Respect, maintain and strengthen local character and distinctiveness?</li> <li>• Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?</li> <li>• Engage communities in identifying culturally key features and areas?</li> <li>• Provide for increased access to and enjoyment of the historic environment?</li> <li>• Provide for increased understanding and interpretation of the historic environment?</li> <li>•</li> </ul>
Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	<ul style="list-style-type: none"> <li>• Promote the use of brownfield land?</li> <li>• Prevent further soil degradation or erosion?</li> <li>• Restore degraded soil?</li> <li>• Minimise the risk of health impacts through contamination?</li> <li>• Maximise the potential benefit of access to new employment and housing as a result of remediation?</li> </ul>
Materials and waste	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	<ul style="list-style-type: none"> <li>• Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?</li> <li>• Maximise use of innovative waste management techniques including smart technology?</li> <li>• Help develop more efficient and sustainable freight transportation?</li> <li>• Minimise negative impacts of waste processing and disposal on vulnerable groups?</li> </ul>
Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	<ul style="list-style-type: none"> <li>• Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects?</li> <li>• Help reduce actual noise levels and disturbances from noise?</li> <li>• Minimise and reduce road, rail and aviation noise and vibration levels and disruption?</li> <li>• Improve people's access to quiet/ tranquil spaces?</li> <li>• Reduce night-time noise in residential areas?</li> </ul>

## 7.2 Assessing the London Plan

The IIA identified, described and evaluated the likely significant effects of implementing the London Plan against the IIA objectives using the assessment guide questions. This was undertaken for the area within the GLA administrative boundary, plus certain places beyond the GLA administrative boundary that could still be affected by the proposals in the London Plan. This may include growth corridors, water bodies and some European designated sites and forms the spatial scope of the assessment.

Any likely effects identified as a result of implementing the London Plan will be described according to criteria presented within the SEA Regulations including a description of the probability, duration, frequency and reversibility of impacts. As the new London Plan covers a period up to 2041, the temporal scope of the IIA is proposed as follows:

- Short-term effects – those effects that occur within the first five years of implementation of the new London Plan;
- Medium-term effects – those effects that occur between six and fifteen years following the adopted of the new London Plan;
- Long-term effects – those effects that will occur beyond fifteen years.

The IIA framework outlined above was used to assess the likely significant effects of the London Plan options. Within each policy assessment, a description of the potential impacts has been included and the significance of the effect determined, taking into account the magnitude of the impact and sensitivity of the feature or receptor concerned. Where a significant effect was predicted, measures to mitigate the effects have been identified so that the potentially significant effects can be avoided or the magnitude of the impact reduced to a level where there would no longer be a significant effects.

In order to correctly code the policy effects, the following table was utilised. The following significance criteria have been developed to assess the effects of the plan options. Significant effects are those as defined in the SEA Directive, as illustrated below.

Where there is an effect could have a positive or negative effect, but the magnitude is uncertain a combination of symbols will be used (e.g. - / ? signifies a potential minor adverse effect with a significant level of uncertainty associated with the predicted effect).

Table 17: Significance ratings and definitions

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of London and wider South East area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within London or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative	Minor negative effects are likely to be limited to small areas within London, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is effect is likely to be minor as is the magnitude of the predicted effect.
--	Significant negative	Likely to affect the whole, or large areas of London and the wider South East or the wider district area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
N/A	Not applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

## 8 Appraisal of strategic options

As part of the London Plan review, high-level spatial development options were tested to assess strategic land use alternatives for London.

### 8.1 GG1 Building strong and inclusive communities

#### 8.1.1 Option 1: Infrastructure led approach

##### Option description

This option focuses on the role of infrastructure as a means to deliver strong and inclusive communities. It aims to deliver physical, green and social infrastructure to meet the needs of communities, and promote a range of positive outcomes. This option supports the role of Healthy Streets, increasing digital connectivity and ensuring access to facilities and services is inclusive and accessible. This option would deliver housing based on a market-led approach.

##### Appraisal and recommendations

This option would support the delivery of key social infrastructure to meet the needs of local residents and help to facilitate community involvement and cohesion. There is particular emphasis on supporting inclusive design to ensure equity of access regardless of any impairment, illness or additional need. However, a market-led approach to housing may result in the shortfall of certain housing needs, for example provision to accommodate low-income communities, or individuals who require accessible and adaptable options.

The option would also encourage a range of economic benefits, and strengthen growth opportunities. Improving digital connectivity would help drive business in a modern, technological world and could play a role in attracting investment from across the globe. High quality digital infrastructure would also provide benefits to employees, facilitating flexible working arrangements, such as home working. This can improve wider access to employment, for example for individuals who are less mobile, or need to be close to health or educational services. This option would also support the provision of cultural infrastructure, which could improve wider access to cultural assets and facilitate growth in cultural industries.

This option strongly supports the delivery of social and physical infrastructure to meet the needs of London. A market-led housing approach would continue to drive housing delivery throughout London. However, as discussed, intervention may be required to ensure delivery responds to all housing needs across London's communities. The insufficient delivery of affordable housing could risk the displacement of some groups, which could have an adverse impact on access to opportunities and overall wellbeing.

A market-led approach to housing should not only focus on the delivery of large-scale, complex developments, which take many years to build. Smaller, local sites can make a valuable contribution to meeting overall housing need. Similarly, an infrastructure led approach would also help to unlock brownfield sites for housing development.

This option would benefit accessibility and connectivity through the delivery of infrastructure, particularly transport infrastructure. This could help to improve access across London and the Wider South East (WSE), facilitating growth and increasing access to opportunities in London, including employment, education and cultural assets. Provision for high quality active transport could also improve links between neighbourhoods and communities.

The provision of green infrastructure, along with the wider Healthy Streets agenda, would be particularly important for built-up urban areas, as green infrastructure can enhance biodiversity in areas where larger parks and green spaces are less accessible. This would help support equal access to the health and wellbeing benefits that green spaces provide. The promotion of the Healthy Street Approach would deliver further environmental benefits, contributing to improved air quality as it discourages private vehicle use, and encourages active transport.

Although delivery of physical infrastructure is a broad term, this option would likely offer improvements to aspects such as flood defence. This could help mitigate against extreme weather events and support communities most exposed to flood risks. It could also promote the delivery of energy infrastructure, and could take advantage of local and greener energy generation, particularly in new developments.

If appropriate measures are not in place, this option could increase pressure on historical assets and their wider setting by prioritising infrastructure growth over the protection of the historic environment. New infrastructure needs to ensure the protection of historical assets and complement the wider historical setting.

##### Recommendations

The market-led housing approach outlined in this option is unlikely to meet the needs of all communities across London. It was recommended that a more co-ordinated approach to housing and infrastructure delivery could be considered, including working closely with developers to ensure that affordable and accessible housing is provided where needed.

##### GLA response

The preferred option is a combination of the three appraised options. The preferred option contains elements of this option, promoting the delivery of key social, green and physical infrastructure to meet the needs of communities. This final option supports high quality design and ensuring inclusive access to all opportunities.

Table 18: GG1 Option 1: Infrastructure-led approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	?		+	+/?	+	n/a	?/+	+	+	+	?/+	+	+	+	?/-	O/+	n/a	+/?
Medium Term						n/a	?		+	+/?	++	n/a	?/+	+	+	+	?/+	+	+	+	?/-	O/+	n/a	+/?
Long Term						n/a	?		+	+/?	++	n/a	?/+	+	+	+	?/+	+	+	+	?/-	O/+	n/a	+/?
Direct / Indirect						n/a	I		D	I/D	D	n/a	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	n/a	I/D
Temporary / Permanent						n/a	T/P		P	P	P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL
<b>EQIA</b>																								
Short Term	?/+	?/+	?/+	n/a	?/-	-	?	+	+	+/?	+	n/a	n/a	+	n/a		?/+	n/a	+	+	n/a	n/a	n/a	+/?
Medium Term	?/+	?/+	?/+	n/a	?/-	-	?	+	+	+/?	+	n/a	n/a	+	n/a		?/+	n/a	+	+	n/a	n/a	n/a	+/?
Long Term	?/+	?/+	?/+	n/a	?/-	-	?	+	+	+/?	++	n/a	n/a	+	n/a		?/+	n/a	+	+	n/a	n/a	n/a	+/?
Direct / Indirect	I	I	I	n/a	I/D	I	I	D	D	I/D	D	n/a	n/a	I/D	n/a		I/D	n/a	I/D	I/D	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	T/P	P	P	P	P	n/a	n/a	T/P	n/a		T/P	n/a	T/P	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a		L/ GL	n/a	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL
<b>HIA</b>																								
Short Term	?/+	?/+	?/+		+/?					n/a	n/a			+	+		?/+	n/a		+	n/a	n/a		+/?
Medium Term	?/+	?/+	?/+		+/?					n/a	n/a			+	+		?/+	n/a		+	n/a	n/a		+/?
Long Term	?/+	?/+	?/+		+/?					n/a	n/a			+	+		?/+	n/a		+	n/a	n/a		+/?
Direct / Indirect	I	I	I		I/D					n/a	n/a			I/D	I/D		I/D	n/a		I/D	n/a	n/a		I/D
Temporary / Permanent	T/P	T/P	T/P		P					n/a	n/a			T/P	T/P		T/P	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL					n/a	n/a			L/ GL	L/ GL		L/ GL	n/a		L/ GL	n/a	n/a		L/ GL
<b>CSIA</b>																								
Short Term				n/a						n/a														
Medium Term				n/a						n/a														
Long Term				n/a						n/a														
Direct / Indirect				n/a						n/a														
Temporary / Permanent				n/a						n/a														
Local / Greater London / Wider Region / Global				n/a						n/a														

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.1.2 Option 2: Housing-led approach

### Option description

This option promotes strong and inclusive communities through the delivery of a range of housing types, to meet the needs of many different groups across London. This includes provision for co-living accommodation, housing for older people and student accommodation. The option places a strong emphasis on affordability, and sets a target of 50% affordable housing delivery for all new developments.

### Appraisal and recommendations

This option seeks to ensure that accessible and affordable housing delivery across the capital meets the needs of all communities, including older people, young professionals, students, key workers, low-income groups and people with disabilities. The provision of affordable accommodation will support inclusive and equitable opportunities, and help to make London a more attractive place to work and live. Co-living accommodation can also provide a cheaper alternative to traditional private renting, allowing greater flexibility within the housing market.

By increasing access to affordable homes, this option would also contribute to positive economic outcomes. It could play a role in overcoming existing barriers to employment, by delivering homes for workers across the city, and helping to retain talent and diversity. Similarly, increasing the provision of affordable student accommodation could broaden access to London's educational and training opportunities. This would not only improve life chances for residents and visitors, but could strengthen the competitiveness of London's global institutions.

This option could help to optimise brownfield sites and ensure land is used in a more efficient, sustainable way. High quality and appropriate housing can have a range of positive health benefits, particularly for lower-income communities, or those with existing health conditions. This includes helping to mitigate overcrowding and homelessness, and improve housing security and ownership.

### Recommendations

It was recommended that this option was widened to consider other housing needs more explicitly, such as specialised housing to support those with long-term health conditions or disability, and ensuring inclusive design in all new housing and accommodation developments. This option could also address the delivery of associated infrastructure alongside housing, such as schools, parks and community facilities.

### GLA response

The preferred option is a combination of the three appraised options. The preferred option contains elements of this option, promoting the delivery of affordable housing and a variety of housing types to remove barriers to the opportunities London has, including education and employment. The preferred option goes further to ensure associated infrastructure

Table 19: GG1 Option 2: Housing-led approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	?		n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	O/+	n/a	n/a
Medium Term						+	?		n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	O/+	n/a	n/a
Long Term						+	?		n/a	++	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	O/+	n/a	n/a
Direct / Indirect						D	I		n/a	D	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	I/D	n/a	n/a
Temporary / Permanent						P	T/P		n/a	P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	?	n/a	+	+/?	+/?	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	?	n/a	+	+/?	+/?	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	+	n/a	++	+	?	n/a	+	+/?	+/?	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	D	I	n/a	I	D	I/D	I	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	T/P	n/a	P	P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I	I	I/D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P	P	P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.1.3 Option 3: Participation and citizenship-led approach

#### Option description

This option supports strong and inclusive communities by allowing for and facilitating community-oriented development. It promotes neighbourhood planning and capacity building, to encourage equitable opportunities across communities in London, and strengthen social integration. This option recognises the important role of community assets, and seeks to protect and enhance cultural heritage, social assets and social infrastructure.

#### Appraisal and recommendations

This option would promote community orientated development, as a means to facilitate community cohesion and meet a range of local needs. Community-led developments can support neighbourhood services that contribute to wellbeing and life chances, including the provision of health, education and social care facilities. This option would need to recognise the variety of views and needs across different communities, and ensure that policies respond to diversity, and actively seeks to engage with harder to reach groups.

The strengthening of community infrastructure could help to build resilience at the local level, particularly by delivering key services. This option would support initiatives such as adult education classes, youth clubs, community spaces, and wider skills development. These services and opportunities could improve life chances and economic opportunities within local communities. A more integrated and active community could play a role in reducing crime, and improve perceptions of safety for all groups.

Social inclusion and interaction can have a range of positive effects on health and wellbeing. Depending on the nature of the community developments, they could play a role in reducing isolation, particularly for older and less mobile residents. Positive effects on natural capital and the natural environment could be facilitated by this option. Community-led developments could contribute to the sustainable management and enhancement of local natural assets, such as parks or wildlife gardens. However this approach could also take the emphasis away from more strategic approaches to management of natural assets.

The focus on neighbourhood planning in this option could help communities to shape and guide sustainable development in their area, in line with local aspirations. A participation-led approach would have positive outcomes on infrastructure delivery and design, by taking into account what the community wants and needs. This could facilitate community empowerment and inclusivity. This option would also result in positive effects for cultural and historic assets as it supports the important role these assets can have within a community. This would help to facilitate the protection and enhancement of these assets and can be a centre for community growth.

#### Recommendations

It was recommended that this option also considers 'secure by design' planning principles, encouraging the role of design in local communities to improve safety, and perceptions of safety.

#### GLA response

The preferred option is a combination of the three assessed options. The preferred option contains elements of this option, promoting community participation and social integration to reduce isolation and increase inclusivity.

Table 20: GG1 Option 3: Participation and citizen-led approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	?/+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+	n/a	n/a	n/a
Medium Term						+	+		n/a	?/+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+	n/a	n/a	n/a
Long Term						+	+		n/a	?/+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+	n/a	n/a	n/a
Direct / Indirect						D	D		n/a	I	I/D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	I/D	D	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+/?	+/?	+	+/?	?/+	+/?	+	+	n/a	O/+	+/?	+	+	n/a	n/a		n/a	n/a	n/a	?	+	n/a	n/a	n/a
Medium Term	+/?	+/?	+	+/?	?/+	+/?	+	+	n/a	O/+	+/?	+	+	n/a	n/a		n/a	n/a	n/a	?	+	n/a	n/a	n/a
Long Term	+/?	+/?	+	+/?	?/+	+/?	+	+	n/a	O/+	+/?	+	+	n/a	n/a		n/a	n/a	n/a	?	+	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	I/D	D	D	n/a	D	I/D	I	D	n/a	n/a		n/a	n/a	n/a	I/D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a		n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+/?				n/a	n/a				n/a	n/a		n/a	n/a		?	+	n/a		n/a
Medium Term	+	+	+		+/?				n/a	n/a				n/a	n/a		n/a	n/a		?	+	n/a		n/a
Long Term	+	+	+		+/?				n/a	n/a				n/a	n/a		n/a	n/a		?	+	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		I/D				n/a	n/a				n/a	n/a		n/a	n/a		I/D	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		T/P	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		L/ GL	L/ GL	n/a		n/a
<b>CSIA</b>																								
Short Term				+/?					n/a															
Medium Term				+/?					n/a															
Long Term				+/?					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/ GL					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.1.4 Preferred option

### Option description

This option aims to promote openness, diversity and equality across London to deliver strong and inclusive communities. This option aims to deliver good-quality services and amenities, increase participation and social integration and reduce isolation. It supports equal access, ensuring that streets and public spaces can be used by all, feel safe and foster community ownership. It aims to ensure new buildings and spaces are designed to be inclusive and adaptable to meet the needs of the community. The option also aims to ensure that all Londoners, including older people, disabled people and young children can move around with ease and access all the opportunities London has to offer.

### Appraisal and recommendations

This option promotes equality, inclusive access and flexibility. It aims to ensure the benefits of growth are shared across the city and people from all groups can live more active and fulfilling lives. Community ownership and increased safety can help reduce isolation, leading to wider health improvements and increased access to other opportunities, such as education or employment.

This option seeks to ensure the delivery of key infrastructure and promote good design, by ensuring the design of new buildings enhances the character of an area, is to a high quality and inclusive to ensure it meets the needs of all members of the community. This option would have positive effects on crime and safety aspects, highlighting the need to ensure the public realm is safe encourage its use by the wider community. This would contribute to decreasing isolation, improving health and wellbeing for residents.

This option strongly meets accessibility and connectivity needs, supporting accessible streets and public spaces and maximising inclusivity. Direct access to public transport can open up further opportunities across London, allowing people to access education, employments, services and facilities across London.

Promoting strong and inclusive communities can deliver economic benefits. This option aims to identify and address barriers faced by certain communities, including poverty and deprivation, by encouraging employment training and skills. This would help improve access to a range of employment opportunities, increasing the available labour force and diversifying the economy. Supporting town centres would also help facilitate local growth, employment and services for people in their local area. This would be particularly important for groups who are less mobile and need opportunities more locally. Similarly, education is also supported through this option, ensuring equal access to educational opportunities throughout London, which could be associated with further benefits including improved wellbeing, development of a skilled labour force and reduced crime.

### Recommendations

This option could support the delivery of housing. It highlights the need to ensure inclusivity and equality throughout London. The delivery of affordable and accessible housing would be an important aspect of inclusive communities, ensuring that all individuals, including low-income groups or those with additional needs, can live in London. Access to good quality housing can also improve access to other opportunities, such as employment or education. This option does acknowledge the need for inclusive access to all opportunities across London, which could cover housing need.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy includes positive provision of walkable neighbourhoods which have the potential to reduce atmospheric pollution from motorised

transport modes. It also provides for the achievement of high standards of environmental sustainability, which has the potential to reduce atmospheric pollution contributions and a reduction in potable water use.

Table 21: GG1 Building strong and inclusive communities

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		+	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a
Medium Term						n/a	+		+	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a
Long Term						n/a	+		+	+	++	+	n/a	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	I/D		I	I/D	I/D	I	n/a	I/D	I/D	I/D	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		T/P	T/P	T/P	P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L	L/ GL	L	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a
Long Term	++	++	+	+	++	+	+	++	++	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	D	I/D	n/a	n/a	I/D	I/D		I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L/ GL	L/ GL / W	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL		L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
Medium Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
Long Term	++	++	++		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
Direct / Indirect	D	D	I/D		I				I	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L		L/ GL				L/ GL	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	
<b>CSIA</b>																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.2 GG2 Making the best use of land

### Option description

This option supports the continuation of existing objectives outlined in the current London Plan. This includes focusing economic growth in the Central Activity Zone (CAZ), Isle of Dogs, town centres and strategic outer London. The Plan supports the sustainable use of land, by focussing residential-led development in key Opportunity Areas, intensification areas and town centres, supported by investment in public transport. To help manage short and medium term housing and employment needs, the Plan supports the managed release of industrial land, in line with set benchmarks. This option also ensures the protection of green spaces, including green belt land.

### Appraisal and recommendations

This option supports the delivery of important housing infrastructure to meet housing need in large scale Opportunity Areas and town centres. New homes can also provide additional social and health benefits, increasing the availability of high quality new housing in London. Although this option supports housing delivering and sustainable land uses in the short and medium term, it does not allow for housing and employment needs to be met in the long term. This could create a number of adverse impacts and uncertainties surrounding the long term competitiveness of the London economy, and the ability to meet the housing needs of future communities.

This option supports the protection of green spaces, particularly public open space and green belt land. This would help ensure the protection of the natural environment and natural assets, protecting associated habitats and species and increasing wider access to nature in London. The protection of green spaces will also have health benefits as they provide space for activities such as physical exercise, mindfulness and community events.

This options supports the appropriate use of large scale, brownfield sites, along with other available land to deliver both residential and mixed-use developments. This will encourage the sustainable delivery of housing and employment infrastructure, which will provide opportunities for businesses and residents alike, supporting wider economic objective. Although the current Plan would help to unlock growth, it leaves uncertainties surrounding land capacity for the quantum of future housing and employment need required.

Investment in transport infrastructure would also deliver accessibility benefits, increasing equity of access to the opportunities London offers, including employment and education. Increasing the use of more sustainable transport options would also contribute to improving air quality by reducing private vehicle use and associated emissions. This would therefore deliver further health benefits across London, particularly in more deprived areas where air quality is often worse.

This option may impact the viability of heritage assets by promoting high density development across London and facilitating growth in town centres. High density developments should ensure historical assets are protected and respected as they form an important part of London's heritage and are a main attraction for tourists to London. Many assets are found in town centres and form an important part of local character of the area.

### Recommendations

It was recommended that this option consider short-term housing delivery options, particularly the use of small sites across London, which can contribute significantly to housing delivery and provide housing at a quicker rate. Further consideration could also be given to the role of multi-functional spaces, to help increase capacity for long term housing and employment needs.

### GLA response

Option 2, Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated, including a focus on the CAZ, Isle of Dogs and town centres. Option 2 also additionally highlights the importance of Old Oak Common and Stratford. Housing growth is similarly residential-led in Opportunity Areas, but Option 2 also considers the use of small sites to deliver housing at a quicker rate across London, with the added benefit of supporting smaller businesses. Option 2 also goes further to support the co-location of complementary residential and industrial land use, increasing density and the efficiency of land use. Option 2 also aims to not just protect green space, but also increase it, increasing the equity of access across London.

Table 22: GG2 Option 1: Current London Plan

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	?/-	?/+	n/a	n/a
Medium Term						O/?	?/+		+	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	?/-	?/+	n/a	n/a
Long Term						?/-	?		+	O/-	?	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	?/-	?/+	n/a	n/a
Direct / Indirect						D	I/D		I/D	I/D	D	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	D	D	I/D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/GL		L/GL	L	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	L/GL	L/GL	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	?/+	+	n/a	+	n/a	+	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	?/-	n/a	n/a	n/a
Medium Term	+	+	+	n/a	?/+	?/+	n/a	+	n/a	?/+	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	?/-	n/a	n/a	n/a
Long Term	+	+	+	n/a	-	?	n/a	+	n/a	?	?	n/a	n/a	+	n/a		n/a	n/a	n/a	+	?/-	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	D	n/a	I/D	n/a	I/D	D	n/a	n/a	I	n/a		n/a	n/a	n/a	D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	T/P	P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	n/a	L	n/a	L	L/GL	n/a	n/a	L	n/a		n/a	n/a	n/a	L	L/GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				+	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Medium Term	+	+	+		+				n/a	n/a				+	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Long Term	+	+	+		+				n/a	n/a				+	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Direct / Indirect	I/D	I	I		D				n/a	n/a				I	n/a		n/a	n/a		n/a	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				T/P	n/a		n/a	n/a		n/a	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				L	n/a		n/a	n/a		n/a	L/GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.2.1 Option 2: Sustainable intensification (Preferred option)

### Option description

This option promotes the sustainable intensification of existing land uses, and exploration of additional capacity sources, to help accommodate long term housing and employment need. It builds upon land use policies within the existing London Plan, to encourage the multi-functional use of spaces, as a means of optimising existing resources.

This option supports economic growth that is primarily located within the CAZ, Isle of Dogs, Old Oak Common and Stratford, alongside dispersed growth across town centres, inner and Outer London. Housing growth would be delivered in residential-led Opportunity Areas, town centres, publically-owned land and small sites throughout London, and supported by public transport infrastructure.

This option seeks to renew medium-order town centres, through high density, housing led, and mixed-use redevelopment. This option supports a design-led approach to maximise densities, subject to a minimum threshold, particularly in areas that are well connected by high levels of PTAL (Public Transport Accessibility Level) and ATAL (Active Travel Accessibility Level). There is a strong emphasis on balancing competing uses, particularly through the protection and enhancement of London's green spaces, including green belt, metropolitan open land, designated nature sites and local spaces, committing to 50% green cover across London.

This option supports transport growth through strategic infrastructure, active travel, sustainable mode share and high density developments. Industrial land management would focus on the retention and intensification of industrial floor space and yard capacity, in addition to the co-location of residential land and complementary industrial use.

### Appraisal and recommendations

The preservation of open space, such as green belt land, can be used for a range of social activities including community activities and physical exercise, delivering social and health benefits and increasing community cohesion. The strong emphasis on preserving green spaces requires the greater optimisation of existing brownfield land resources to meet a range of housing, economic and community needs.

This option supports the delivery of high density development, underpinned by high quality transport infrastructure and a design-led approach to ensure growth is inclusive and meet the needs of the community. This option supports a diverse range of housing delivery options, considering a variety of spaces which can provide homes, not just large-scale developments. This would provide opportunities for smaller building firms and meet housing demands more quickly than large scale developments.

This option ensures brownfield sites are used effectively and designs are appropriate to improve the character of the wider area. This option would also support the delivery of strategic transport infrastructure which underpins sustainable growth and ensures inclusivity through the consideration of PTAL and ATAL, allowing people to access the wide range of opportunities London has to offer.

The efficient use of land, particularly through the co-location of complementary services, infrastructure and residential units, will ensure that London can continue to grow and diversify its economy within limited space. Importantly, intensification and co-location will help to accommodate the long term housing and employment needs of London, and strengthen future competitiveness. The delivery of smaller sites would also support smaller business, particularly building firms, further diversifying the economy of London. The strategic location of businesses and residential units, alongside investment in

social and transport infrastructure, can help to remove barriers to employment and increase the wider workforce.

This option would also result in positive environmental effects. Increased public transport use and the promotion of active travel would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can further help to ensure the number of people exposed to high levels of noise is in decline. Protecting and increasing green and open space and the use of green infrastructure would facilitate the protection of habitats, species and landscapes and increase access to nature across London, even in the most built up areas.

The promotion of high density and development and small sites across London may limit runoff and consequently impact flood risk across London. This option does however promote the protection and enhancement of green and open space to 50% green space coverage, which may mitigate this impact. The overall impacts of high density development, in combination with optimised land uses on flood risk and associated management, remains uncertain.

This option may impact the viability of heritage assets by promoting high density development across London and facilitating growth in town centres. High density developments should ensure historical assets are protected and respected as they form an important part of London's heritage and are a main attraction for tourists to London. Many assets are found in town centres and form an important part of local character of the area.

### GLA response

This option was chosen as the preferred option. It ensures the delivery of a wide range of environmental, economic and social benefits. It ensures land is used efficiently and effectively, it removes barriers to employment, considers community needs in the design of new developments and supports the protection and enhancement of the natural environment. This would contribute to wider economic benefits, ensuring London remains and productive and attractive city for all.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy as it provides for the protection of London's open spaces and designated nature conservation sites and providing for new publicly accessible green infrastructure and open space (thus reducing increased recreational pressure upon European designated sites).

This policy also contains positive provision by giving priority to sustainable transport modes to support a strategic target of an 80% mode share for walking, cycling and public transport. This has the potential to aid in a reduction in atmospheric pollution.

Table 23: GG2: Sustainable Intensification

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	n/a	?	n/a	?	n/a	n/a	?	+	?	?	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	?	n/a	?	n/a	n/a	?	+	?	?	n/a	n/a
Long Term						++	+		++	++	++	n/a	n/a	?	n/a	?	n/a	n/a	?	++	?	?	n/a	n/a
Direct / Indirect						D	D		I/D	D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	D	I/D	D	I	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L	L	L/ GL	n/a	n/a	L	n/a	L	n/a	n/a	L/ GL	L	L/ GL	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?	+	?	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?	+	?	n/a	n/a	n/a
Long Term	+	++	+	n/a	+	+	+	++	+	++	++	n/a	n/a	?	n/a		n/a	n/a	?	+	?	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	D	D	I/D	I/D	D	I/D	n/a	n/a	I	n/a		n/a	n/a	D	I/D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	L	L	L	L	L/ GL	n/a	n/a	L	n/a		n/a	n/a	L/ GL	L	L/ GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?	n/a		n/a
Medium Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?	n/a		n/a
Long Term	+	+	++		+				+	n/a				+	n/a		n/a	n/a		+	?	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		I/D				I/D	n/a				I	n/a		n/a	n/a		I/D	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	n/a				T/P	n/a		n/a	n/a		T/P	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		n/a	n/a		L	L/ GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.2.2 Option 3: Polycentric approach

### Option description

This option supports a polycentric approach to land use, dispersing economic growth evenly across town centres, and in sustainable locations within inner and outer London. It aims to deliver housing growth in Opportunity Areas, town centres, publically owned land and small sites, complementing these wider patterns of economic growth.

This option promotes town centres in sustaining commercial, cultural and social infrastructure, and night time economy development, particularly outside of the CAZ. It aims to drive the renewal of medium order town centres, through high density, housing led, mixed-use redevelopment. This dispersed pattern of growth would be supported by improved orbital transport links, particularly improving connections between lower-tier town centres and with outer London. This option would not allow for the release of industrial land.

### Appraisal and recommendations

The implementation of this option would ensure that housing delivery across London is diverse, and considers a variety of opportunities, as opposed to just large-scale developments. This includes exploring options surrounding small sites, which could provide opportunities for smaller building firms to meet housing demands at a faster rate, compared to large, complex schemes.

The delivery of new homes and employment opportunities close together could help to improve access to opportunities, and could contribute to social integration locally. This option would also support connectivity and accessibility options by increasing connectivity between different towns and communities through improving transport networks where PTAL is low. It could reduce the need to use private vehicles as homes and employment are close together, facilitating walking and cycling. This would therefore support improvements to local air quality by reducing emissions associated with private vehicle use. Although the policy supports improvements to the orbital transport network, this may not benefit areas which are not currently well connected to services and opportunities in central London.

The targeted provision of a range of housing options encourage improved health and wellbeing outcomes, and could play a role in reducing homelessness and overcrowding. This option would promote the delivery of physical infrastructure, ensuring the growth of local neighbourhoods by delivering supporting infrastructure alongside housing, including social and wider physical infrastructure. Similarly cultural infrastructure could be supported outside of the CAZ by this option.

This option would help to deliver economic benefits, supporting and enhancing local economies, neighbourhood centres and street markets. This would help to increase access to employment, especially for those who are less mobile (e.g. due to a physical illness or care responsibilities) who can access employment in their local area more easily. However, dispersed economic growth could limit London's competitiveness and reduce the viability of more traditional economic centres, such as CAZ or the Northern Isle of Dogs, which contribute significantly to the London economy.

This option could have negative impacts on noise objects by facilitating the dispersal of businesses and services throughout London, located within close proximity to housing.

### Recommendations

It was recommended that this option consider the importance of supporting and enhancing traditional economic sites alongside more local options.

### GLA response

Option 2 Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated into Option 2, including the need to support local economies. However, Option 2 also considers the importance of more traditional economic sites, such as CAZ and NIOD alongside local economies. This option supports the use of small sites, which can help deliver business and housing in dispersed locations across London where land is available. Option 2 also considers the wider availability of transport, rather than just focusing on orbital growth. It aims to use PTAL and ATAL to identify specific transport needs across London.

Table 24: GG2 Option 3: Polycentric approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+/?	n/a		+/?	?/-	+/?	n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term						+/?	n/a		+/?	?/-	+/?	n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term						+/?	n/a		+/?	?/-	+/?	n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect						I/D	n/a		I/D	I/D	I/D	n/a	I/D	I	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a		T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		L	L/ GL	L	n/a	L	L	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	n/a	+/?	+	+/?	n/a	n/a	+	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	n/a	+/?	+	+/?	n/a	n/a	+	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	+	+	n/a	+/?	+	+/?	n/a	n/a	+	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	D	I	n/a	I/D	I/D	n/a	I/D	I/D	I/D	n/a	n/a	I/D	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	n/a	L	L	L/ GL	n/a	n/a	L	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I/D	D	I		n/a				I/D	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.2.3 Option 4: Current London Plan and selective green belt release

#### Option description

This option seeks to continue following those objectives outlined in the current London Plan, with the addition of limited green belt release in sustainable locations, to accommodate identified housing and employment needs over the Plan period. The option supports the location of economic growth in the Central Activity Zone (CAZ), Isle of Dogs, town centres and strategic outer London. Housing growth would be primarily located in Opportunity Areas, intensification areas and town centres, along with additional green belt release to support new local and neighbourhood centres. This option supports the managed release of industrial land, in line with agreed benchmarks.

#### Appraisal and recommendations

This option supports high density housing delivery in town centres, Opportunity Areas and intensification areas, supported by high quality transport infrastructure. To meet a range of local housing needs, and to accommodate long term growth, limited green belt release would be supported in sustainable locations. This release would be determined through the Local Plan process, and would prioritise previously developed and low performing green belt, along with growth around commuter hubs.

The sustainable release of green belt land can bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline.

This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London.

Environmentally, the selective release of green belt land could have adverse impacts on species and habitats, and could set precedent for further green belt release, putting further natural capital at risk. Green belt land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of non-permeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available to act as a carbon sink for emissions.

Green belt land is also carefully protected, and the legal challenges surrounding its release are likely to take a considerable amount of time. The release of this land, therefore, would not be immediate and the delivery of infrastructure would take a long time to surface. This could pose challenges in relation to meeting immediate housing needs across the city.

#### Recommendations

It was recommended that an alternative to green belt release is considered due to the severe environmental damage it could have. High densities and the co-location of industry and residential units could be an alternative to this.

#### GLA response

Option 2, Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated, including a focus on the CAZ, Isle of Dogs and town centres. Option 2 also additionally highlights the importance of Old Oak Common and Stratford. Housing growth is similarly residential-led in Opportunity Areas, but Option 2 also considers the use of small sites to deliver housing at a quicker rate across London, with the added benefit of supporting smaller businesses. Option 2 also goes further to support the co-location of complementary residential and industrial land use, increasing density and the efficiency of land use. This option does not support selective green belt release but instead ensures the protection of green belt land, protecting the environmental and social benefits green belt provides. The use of small sites and co-location are ways to use land more efficiently to reduce the need to green belt release.

Table 25: GG2 Option 4: Current London Plan and Green belet release

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	n/a	-/?	n/a	n/a	n/a	n/a	-/?	-/?	?/-	+/?	n/a	n/a
Medium Term						+?	+/?		+	+	+	n/a	n/a	-/?	n/a	n/a	n/a	n/a	-/?	-/?	?/-	+/?	n/a	n/a
Long Term						+/?	?		+	+	?	n/a	n/a	-/?	n/a	n/a	n/a	n/a	-/?	-/?	?/-	+/?	n/a	n/a
Direct / Indirect						D	I/D		I/D	I/D	D	n/a	n/a	D	n/a	n/a	n/a	n/a	D	D	D	I/D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/ GL	L	L/ GL	n/a	n/a	L	n/a	n/a	n/a	n/a	L	L	L/ GL	L/ GL	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	n/a	+	n/a	+	+	n/a	?/-	-/?	n/a		n/a	n/a	-/?	-/?	?/-	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	n/a	+	n/a	+	+	n/a	?/-	-/?	n/a		n/a	n/a	-/?	-/?	?/-	n/a	n/a	n/a
Long Term	+	+	+	n/a	+	+	n/a	+	n/a	+	?	n/a	?/-	-/?	n/a		n/a	n/a	-/?	-/?	?/-	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	D	n/a	I/D	n/a	I/D	D	n/a	I/D	I	n/a		n/a	n/a	D	D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	T/P	P	n/a	T/P	T/P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	n/a	L	n/a	L	L/ GL	n/a	L	L	n/a		n/a	n/a	L	L	L/ GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				-/?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Medium Term	+	+	+		+				n/a	n/a				-/?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Long Term	+	+	+		+				n/a	n/a				-/?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Direct / Indirect	I/D	I	I		D				n/a	n/a				I	n/a		n/a	n/a		n/a	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				T/P	n/a		n/a	n/a		n/a	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				L	n/a		n/a	n/a		n/a	L/ GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.2.4 Option 5: Current London Plan and city region approach

### Option description

This option seeks to continue following the objectives outlined in the current London Plan, with Additional investment in growth locations across the wider region. The option supports that economic growth is delivered in the Central Activity Zone (CAZ), Isle of Dogs, town centres and strategic outer London. As with the current Plan, housing growth would be residential-led in key Opportunity Areas, intensification areas and town centres. In addition to intensification within London, opportunities for growth would extend to locations outside of the city in the Wider South East (WSE) region and beyond, to achieve a range of mutual benefits.

### Appraisal and recommendations

Implementation of this option would facilitate housing delivery in large scale Opportunity Areas, town centres and across the WSE region. This could help to meet the long term housing needs of London, and capitalise on existing strategic transport infrastructure. High quality, new housing could respond to a range of existing pressures, including homelessness and overcrowding, and improve overall health and wellbeing. There is however uncertainty surrounding housing prices, which could rise as a result of housing needs in the city not being met, and in turn displace key workers or lower income communities. Similarly, investing in growth locations in the wider regions could detract from considering smaller, more local sites for housing. This could delay housing delivery in meeting immediate demands.

The delivery of infrastructure across London and the WSE would support mutual benefits for both London and surrounding regions, through the sustainable use of land and delivery of strategic infrastructure. This option would increase the amount of land available for new industry and economic growth. In particular, this could help to lower costs, and open up opportunities for small businesses. This would help facilitate that generation of new businesses and jobs. However this option could also have negative economic effects, by driving some economic growth out of London.

This option supports the protection of natural capital and heritage assets within London by offering an alternative location for business and housing across the WSE, ensuring the protection of green belt land and heritage assets. This will help to ensure the protection of the natural environment and associated habitats and species. It could also help to encourage wider access to nature in London, and promote a range of health benefits.

However, this option could create adverse impacts on air quality and climate change, by increasing commuting and the overall need for transport across London and the WSE. By dispersing growth in the WSE, it would increase the need to transport goods or waste, leading to increased emissions and associated poor air quality.

### GLA response

Option 2, Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated into Option 2, however there is a focus on delivering high density developments in London rather than using the WSE. This option still includes similar objectives, supporting the CAZ, NIOD and town centres and delivering residential-led, mixed use developments. However, to support growth in London, where space is limited, Option 2 also promotes the high density developments, increased active travel, the co-location of complementary residential and industrial units and the use of small sites across London to deliver infrastructure.

Table 26: GG2 Option 5: Current London plan and city region approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+/?	+	n/a	n/a	-	-	n/a	n/a	n/a	n/a	+	+	+/?	-	n/a
Medium Term						+	+/?		+	+/?	+	n/a	n/a	-	-	n/a	n/a	n/a	n/a	+	+	+/?	-	n/a
Long Term						+	?		+	+/?	+	n/a	n/a	-	-	n/a	n/a	n/a	n/a	+	+	+/?	-	n/a
Direct / Indirect						D	I/D		D	I/D	D	n/a	n/a	I	I	n/a	n/a	n/a	n/a	D	I/D	I/D	I/D	n/a
Temporary / Permanent						T/P	T/P		P	T/P	P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	L	L/ GL	n/a	n/a	L	L	n/a	n/a	n/a	n/a	L	L/ GL	L/ GL	L	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	n/a	+	+	+/?	+	n/a	n/a	-	-		n/a	n/a	n/a	+	+	n/a	-	n/a
Medium Term	+	+	+	n/a	+	+	n/a	+	+	+/?	+	n/a	n/a	-	-		n/a	n/a	n/a	+	+	n/a	-	n/a
Long Term	+	+	+	n/a	+	+	n/a	+	+	+/?	+	n/a	n/a	-	-		n/a	n/a	n/a	+	+	n/a	-	n/a
Direct / Indirect	I	I	I	n/a	D	D	n/a	I/D	D	I/D	D	n/a	n/a	I	I		n/a	n/a	n/a	D	I/D	n/a	I/D	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	P	T/P	P	n/a	n/a	T/P	T/P		n/a	n/a	n/a	T/P	T/P	n/a	T/P	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	n/a	L	L/ GL	L	L/ GL	n/a	n/a	L	L		n/a	n/a	n/a	L	L/ GL	n/a	L	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				-	-		n/a	n/a		n/a	+	n/a		n/a
Medium Term	+	+	+		+				n/a	n/a				-	-		n/a	n/a		n/a	+	n/a		n/a
Long Term	+	+	+		+				n/a	n/a				-	-		n/a	n/a		n/a	+	n/a		n/a
Direct / Indirect	I/D	I	I		D				n/a	n/a				I	I		n/a	n/a		n/a	I/D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				T/P	T/P		n/a	n/a		n/a	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				L	L		n/a	n/a		n/a	L/ GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.3 GG3 Creating a Healthy City

### 8.3.1 Option 1: Prevention

#### Option description

This option supports improvements to the health and wellbeing of Londoners by targeting the underlying causes of poor health. This option identifies how causes of poor health, such as low levels of exercise and poor diet, can be managed through planning and design.

This option promotes interventions such as the Healthy Street Approach, building design, active travel, improved air quality, increased access to green and open spaces, and promoting a healthy food environment to encourage healthier lifestyles across London.

#### Appraisal and recommendations

Implementation of this option would support people accessing healthier choices and places. Healthy streets and access to good quality green space can encourage more physical activity, by providing suitable space to exercise in, and facilitating active forms of transport. Green and open spaces can provide further benefits, including providing a place for mindfulness and relaxation, and also a centre for community events and social interaction. They can also provide quieter spaces, reducing local noise levels and providing places of tranquillity. This can all contribute to improved physical and mental health and wellbeing and manage the underlying causes of ill-health.

By driving improvements to health, this option can improve wider economic prosperity. Ill-health can be costly in terms of direct costs to the health service, and associated costs from loss of productivity. However, this option does require initial investment in infrastructure to improve wider health and the direct benefits may not be seen in the short-term.

In relation to design and development, this option encourages new homes and development to consider good design to support health improvements. Modern homes are usually at a lower risk from issues such as mould or damp and can be designed to take into account specific needs to ensure they are accessible for all. In the wider environment, the use of green infrastructure, Healthy Streets and green/open spaces can promote an attractive and safe environment, which encourages a sense of place.

Accessibility and connectivity would be positively affected by this option, particularly through the Healthy Street Approach which promotes high quality walking infrastructure, increasing access to the wider public transport network, whilst facilitating more active modes of transport.

The option encourages the preservation of existing green spaces and the use of green infrastructure. This can increase natural assets throughout London, even in the most built-up areas. The promotion of active travel can contribute to a decline in private vehicle use, reducing associated emissions and air quality impacts.

#### Recommendations

It was recommended that this option included a targeted-approach in some circumstances to help ensure that the most deprived areas of London experience health benefits. For example, in the most deprived parts of London, air quality is often worse and concentrations of unhealthy food outlets are often higher. These deprived areas may need more support and intervention to ensure improvements to health.

The option could have also considered direct health management. Although managing the wider causes of ill-health is important, this may be a long-term solution and not support immediate health issues. The option should be implemented alongside ensuring residents have equal access to health and social care facilities. The provision of healthy food outlets and spaces for physical exercise may not necessarily mean people take up these choices. Other methods, such as healthy lifestyle campaigns, may need to be implemented alongside for encouragement.

Lastly, it was recommended that wider determinants of health were also considered. Access to education and employment are also associated with positive health and wellbeing, and this option could consider increasing opportunities to better health.

#### GLA response

The preferred option is a combination of the three assessed options. The preferred option includes aspects of this option, most importantly the overall drive to improve the underlying causes of ill-health, particularly low levels of exercise and unhealthy food consumption. The preferred option considers the importance of the Healthy Street Approach, active travel, building design, protecting green spaces and promoting healthy food.

Table 27: GG3 Option 1: Prevention

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		+	?/+	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term						n/a	+		+	?/+	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term						n/a	++		+	?/+	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	I/D	n/a	n/a	n/a	D	n/a	D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		P	T/P	n/a	n/a	n/a	P	n/a	T/P	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+/?	n/a	+	?	+	+	+	?/+	+	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	+	+	+/?	n/a	+	?	+	+	+	?/+	+	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	+	+	+/?	n/a	+	?	+	+	+	?/+	+	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	n/a	D	I/D	D	I	D	I/D	D	I/D	n/a	D	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent	P	P	T/P	n/a	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	P	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+/?		+/?					n/a	?/+				+	n/a		n/a	n/a	+	n/a	n/a		+
Medium Term	+	+	++ /?		+					n/a	?/+				+	n/a		n/a	n/a	+	n/a	n/a		+
Long Term	+	+	++ /?		++					n/a	?/+				+	n/a		n/a	n/a	+	n/a	n/a		+
Direct / Indirect	D	D	D		D					n/a	I/D				D	n/a		n/a	n/a	D	n/a	n/a		I
Temporary / Permanent	P	P	T/P		T/P					n/a	T/P				P	n/a		n/a	n/a	P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL					n/a	L/ GL				L/ GL	n/a		n/a	n/a	L/ GL	n/a	n/a		L/ GL
<b>CSIA</b>																								
Short Term				n/a						+														
Medium Term				n/a						+														
Long Term				n/a						+														
Direct / Indirect				n/a						I/D														
Temporary / Permanent				n/a						T/P														
Local / Greater London / Wider Region / Global				n/a						L/ GL														

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.3.2 Option 2: Cure

### Option description

This option focuses on the immediate provision of health and social care facilities to address existing health issues across London.

### Appraisal and recommendations

Implementation of this option would result in some short-term positive effects on health and health inequalities and accessibility. The option aims to directly increase access and equity of access to health and social care services, facilities and infrastructure, which can manage immediate mental and physical illnesses. However, in the long-term it may not have positive effects as the underlying causes of ill-health, particularly non-communicable diseases, are not addressed, such as low levels of exercise and unhealthy food consumption.

Implementation of this option could also deliver positive short-term economic effects. Poor health can have economic impacts through direct costs of health treatment and the loss of productivity associated with sick leave. This option could also help to enable those with physical and mental health conditions manage their illnesses and help them to stay in employment. However, in the long-term positive effects may not be gained as the underlying causes of ill-health are not addressed, limiting improvements to the health of Londoners.

### Recommendations

The main recommendation was that this option considers the wider determinants of health to improve the long-term health of Londoners. This could include delivering spaces that encourage physical exercise, improving access to affordable healthy food, improving housing quality and improving access to opportunities such as education or employment.

### GLA response

The preferred option is a combination of the three appraised options. The preferred option acknowledges the need for a co-ordinated approach to managing health and the inclusion of stakeholders and service providers, which would include the provision of health and social care services. However, the final option has also considered the wider health determinants to improve long-term health of Londoners.

Table 28: GG3 Option 2: Cure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	-/?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	?+	n/a	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	?+	n/a	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	?+	n/a	n/a	n/a	n/a	++	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	D	n/a	n/a	n/a	n/a	D	n/a	I	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T	n/a	n/a	n/a	n/a	P	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	L	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	?/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	?/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	?/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.3.3 Option 3: Spatially-targeted approach

#### Option description

This option outlines a spatial focus on the wider determinants of health to manage the health and health inequalities of London. This includes spatially targeting issues and inequalities in housing, employment and education.

#### Appraisal and recommendations

This option seeks to improve wider health inequalities across London. Often those affected by health inequalities also experienced other forms of inequalities, and by spatially targeting the wider determinants of health, this policy can improve access to opportunities across London to facilitate health improvements. This can deliver other health benefits, including reducing actual and perceived isolation.

The design of a local area can contribute significantly to health. This option supports the delivery of a well-maintained, safe and accessible public realm which would help to facilitate walking and cycling and social integration. Design can also take into account more specific needs, such as support groups with sensory or cognitive impairments.

By driving improvements to health, this option would support wider economic prosperity. Ill-health can be costly in terms of direct costs to the health service, and associated costs from loss of productivity and therefore management of the underlying causes of health will have economic benefits in the long term. Education is also identified as a key determinant of health and a spatially targeted approach can support the most deprived areas to ensure educational opportunities are increased.

This option would have positive effects on air quality. The most deprived areas of London often experience some of the poorest air quality, and a spatially-targeted approach could help to improve the worst areas and help the most vulnerable groups. Similarly other environmental aspects would benefit, such as the protection of green spaces which can provide spaces for physical exercise, relaxation and mindfulness, and reduce local noise levels.

#### Recommendations

It was recommended the option consider good access to health and social care facilities alongside managing the wider determinants of health. This would ensure that short-term, immediate health conditions are managed alongside improving the underlying causes of ill-health.

#### GLA response

The preferred option is a combination of the three assessed options. The preferred option facilitates a co-ordinated approach, taking into account more vulnerable groups and deprived areas. The preferred option similarly focuses on the wider determinants of health and supports a co-ordinated approach to managing health and health services.

Table 29: GG3 Option 3: Spatially-targeted approach

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term						n/a	+		n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term						n/a	+		n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	D		n/a	I/D	D	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	T		n/a	T	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		n/a	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	n/a	+	+/?	n/a	+	+	+	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	n/a	+	+/?	n/a	+	+	+	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	+	n/a	+	+/?	n/a	+	+	+	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	D	n/a	D	n/a	D	D	n/a	D	D	D	n/a	D	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T	n/a	T	n/a	T	T	n/a	T/P	T/P	T/P	n/a	T/P	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	?		+				n/a	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				n/a	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Long Term	+	+	+		+				n/a	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		D				n/a	n/a				D	n/a		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		T				n/a	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				L/ GL	n/a		n/a	n/a		L/ GL	n/a	n/a		L/ GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.3.4 Preferred option

#### Option description

This option supports improvements to the health and wellbeing of Londoners by ensuring the wider determinants of health are addressed in an integrated and co-ordinated way to reduce health inequalities. This option aims to enable people to make healthier choices and uses the planning system to promote design choices that improve health, such as the Healthy Streets approach, high quality housing and green infrastructure.

#### Appraisal and recommendations

Implementation of this option would support individual access to healthier choices and places. Healthy streets and access to good quality green space can encourage more physical activity, by providing suitable space to exercise in, and facilitating active forms of transport. Green and open spaces can provide further benefits, including a space for mindfulness and relaxation, and also a centre for community events and social interaction. This can all contribute to improved physical and mental health and wellbeing and manage the underlying causes of ill-health.

By driving improvements to health, this option can improve wider economic prosperity. Ill-health can be costly in terms of direct costs to the health service, and associated costs from loss of productivity. This option also identifies education and employment as determinants of health, and that those experiencing health inequalities often experience other forms of inequality. Therefore, a co-ordinated and integrated approach to health management would help to remove barriers to educational and employment opportunities, further improving health and wellbeing.

In relation to design and development, this option emphasises the role of regeneration to target areas of deprivation. It encourages new homes and development to consider good design to support health improvements. Modern homes are usually at a lower risk from issues such as mould or damp, are well-insulated and can be designed to take into account specific needs to ensure they are accessible for all. In the wider environment, the use of green infrastructure, Healthy Streets and green/open spaces can promote an attractive environment, which encourages a sense of place.

Accessibility and connectivity would be positively affected by this option, particularly through the Healthy Street Approach which promotes high quality walking infrastructure, increasing access to the wider public transport network whilst facilitating more active modes of transport.

The option would have positive effects on environmental aspects as it would encourage the preservation of green spaces and waterways and the use of green infrastructure. This can increase the presence of the natural environment even in the most built up areas.

The option would have positive effects on air quality through the promotion of Healthy Streets to reduce private vehicle use and promote active travel. The protection of green and open spaces and waterways will also contribute to air quality improvements.

Implementation of this option would have positive impacts on climate change. The option identifies the impact excessive heat and cold can have on individuals, particularly more vulnerable groups, and how building design can be used to reduce health risks. Improvements to wider air quality, through the

Healthy Street Approach, would also support climate change by reducing associated emissions. Many of these positive impacts would occur in the long-term.

Lastly, the protection of green spaces and reducing private vehicle use can contribute to improving exposure to excessive background noise across London.

#### Recommendations

This option considers many different health determinants. It was recommended that crime and fear of crime was also considered, as this can act as a key barrier to access other opportunities and increase isolation, particularly in vulnerable groups.

It was also recommended the option detail more explicitly that good access to health and social care facilities will also be managed, to support immediate health conditions. However it was acknowledged that the option identifies a co-ordinated approach to managing health and inclusion of stakeholders and service providers, which could cover the provision of health and social care services.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy is positive in promoting the need for Local Plans to ensure that proposals for new development provide accessible local green space. Natural Green Space of appropriate character and function provision is an important aspect in ensuring that recreational pressure on International Sites can be avoided. The policy also promotes the need for Local Plans to reduce air pollution. While this is primarily driven by human health considerations, sites such as Epping Forest SAC are vulnerable to air pollution and therefore policy commitments to reductions in air pollution represent a beneficial approach.

Table 30: GG3 Creating a healthy city

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	+	n/a	+	O	O	n/a	+	n/a	+	n/a	n/a	n/a	+
Medium Term						+	+		+	+	+	+	n/a	+	+	+	n/a	+	n/a	+	n/a	n/a	n/a	+
Long Term						+	++		++	+	+	+	n/a	++	+	+	n/a	+	n/a	+	n/a	n/a	n/a	+
Direct / Indirect						I	D		D	I	I	I	n/a	D	I/D	D	n/a	I/D	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent						T/P	P		P	P	P	T/P	n/a	T/P	T/P	T/P	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL /W	L/GL /W	n/a	L/GL	n/a	L/GL	n/a	n/a	n/a	L/GL
<b>EQIA</b>																								
Short Term	+	+	+	?	+	+	+	+	+	+	+	+	n/a	+	O		n/a	+	n/a	+	n/a	n/a	n/a	+
Medium Term	+	+	++	?	+	+	+	+	+	+	+	+	n/a	+	+		n/a	+	n/a	+	n/a	n/a	n/a	+
Long Term	+	+	++	?	+	++	++	+	++	+	+	+	n/a	++	+		n/a	+	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	D	D	I/D	I	I	D	D	D	D	I	I	I	n/a	D	I/D		n/a	I/D	n/a	D	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	P	T/P	n/a	T/P	T/P		n/a	T/P	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL /W		n/a	L/GL	n/a	L/GL	n/a	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	+	+	+/?		+/?				+	+				+	O		n/a	+		+	n/a	n/a		+
Medium Term	+	+	++		+				+	+				+	+		n/a	+		+	n/a	n/a		+
Long Term	+	+	++		++				+	+				++	+		n/a	+		+	n/a	n/a		+
Direct / Indirect	D	D	D		I				D	I				D	I/D		n/a	I/D		D	n/a	n/a		I
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	P				T/P	T/P		n/a	T/P		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		L/GL				L/GL	L/GL				L/GL	L/GL /W		n/a	L/GL		L/GL	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.4 GG4 Delivering the homes Londoners need

### 8.4.1 Option 1: Temporary housing

#### Option description

This option prioritises the delivery of temporary housing across London.

#### Appraisal and recommendations

Implementation of this option would help to alleviate homelessness issues and allow people to continue accessing opportunities in London, such as employment or education. It would also support the provision of safer and high quality housing, which would reduce the risk of issues such as mould, damp or cold. Newer housing would also be more energy efficient and reduce the risk of issues such as fuel poverty. However, in the long-term, the wider issue of affordability in London would not be addressed as people may still be priced out of London due to the lack of permanent affordable housing.

By not having a long-term, permanent location people may also not settle into a community and form social networks, limiting community cohesion. This could limit wider access to education and make the transition to employment more difficult as lack of permanent location could mean people could move again suddenly and disrupt their educational prospects. A lack of permanent location could also facilitate impacts on crime and safety as people do not take ownership of an area and community cohesion is reduced.

A lack of a permanent home could also impact local townscape and character. It would not help people to feel positive about an area or take ownership of their neighbourhoods. It may also result in a lack of investment in wider infrastructure which would help make the area more attractive and vibrant.

#### Recommendations

It was recommended that this option consider long-term solutions to housing issues, particularly the affordability of housing.

#### GLA response

The preferred option is a combination of the four assessed options. The preferred option aims to improve the wider housing market and provide permanent, affordable homes across London in small and larger sites.

Table 31: GG4 Option 1: Temporary housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	-		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	-		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	-		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						D	D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	?	?	-	n/a	n/a	-	n/a	-	n/a	n/a	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+/O	+/O	n/a	n/a	?	?	-	n/a	n/a	-	n/a	-	n/a	n/a	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	O/-	O/-	n/a	n/a	?	?	-	n/a	n/a	-	n/a	-	n/a	n/a	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	n/a	D	D	D	n/a	n/a	I	n/a	I	n/a	n/a	n/a		D	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a		L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+/O	+/O	+/O		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	O/-	O/-	O/-		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		D	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		T/P	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		L/ GL	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				O/-					n/a															
Medium Term				O/-					n/a															
Long Term				O/-					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.4.2 Option 2: Delivering against housing need

### Option description

This option aims to deliver homes against housing need in London. This includes the delivery of different types of homes including family homes and one bedroom or studios. This option aims to consider need more closely, addressing the type and size of dwellings in the delivery of housing.

### Appraisal and recommendations

The implementation of this option would support the delivery of a range of housing types to improve resident choice and directly meet housing need. This would help increase the range of housing available on the market and could include more specialist housing to meet particular needs, such as those with health conditions or disability. New homes must also conform to high standards, and therefore this option would help to reduce potential health risks such as damp, mould and cold. New homes are often more energy efficient and therefore issues such as fuel poverty would be reduced. This option would also help facilitate regeneration in the local area, delivering important physical and social infrastructure. However, this option focuses more on the type of housing delivered and does not consider the affordability of housing. Affordability is a key issue in London and risks pricing key workers out of London and reducing access to wider opportunities, such as education.

This option supports the delivery of housing and wider supporting infrastructure. Due to the built up nature of London, this option would ensure the appropriate use of available brownfield sites in London. It would also facilitate design improvements by promoting the development of housing and associated infrastructure which meets the wider needs of the local community.

### Recommendations

It was recommended that this option widen its scope to consider the affordability of housing in London to ensure that the right type of housing is delivered at an affordable price.

### GLA response

The preferred option is a combination of the four assessed options. The preferred option supports the delivery of a diverse range of housing and identifying wider housing need, including specialist housing. However, this option also identifies the need to ensure all new housing is affordable.

Table 32: GG4 Option 2: Delivering against housing need

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		n/a	+/?	n/a	+	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	+		n/a	+/?	n/a	+	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	+		n/a	+/?	n/a	+	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I/D	D		n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	+	n/a	n/a	+/?	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	n/a	n/a	+/?	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	+	+	+	n/a	n/a	+/?	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	D		D				n/a	n/a				n/a	n/a		I/D	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		T/P	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		L/ GL	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.4.3 Option 3: Leaving delivery to market forces

#### Option description

This option focuses on leaving the delivery of new housing to market forces, supporting develop-led housing provision.

#### Appraisal and recommendations

This option leaves housing growth to market forces, which could result in some positive economic and social effects. This option would continue the development of housing across London, increasing housing stock which is built to high standards. This would help to reduce health risks associated with poor quality housing, such as cold, damp or mould, which is usually more prevalent in more deprived areas. However, without intervention and targets, the needs of certain groups may not be supported. No intervention could mean the need for specialist homes, such as those adapted for less mobile individuals, is not addressed and issues such as homelessness or overcrowding not alleviated. It may also not meet affordable housing delivery, resulting in groups being priced out of London.

Market homes may not also ensure the delivery of homes in suitable location, which might restrict access to opportunities such as education or employment. It may also impact air quality if the public transport network is not appropriate, increasing private vehicle use and increasing associated emissions. Similarly market housing could put pressure on existing water and energy supplies. It would need to be ensured that market housing also delivers appropriate infrastructure.

#### Recommendations

It was recommended that this option consider the need for intervention to support more vulnerable groups. This would include ensuring the delivery of affordable housing and more specialist housing.

#### GLA response

The preferred option is a combination of the four assessed options. The preferred option supports the delivery of a diverse range of housing and identifying wider housing need, including specialist and affordable housing.

Table 33: GG4 Option 3: Leaving delivery to market forces

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?/-	?/+		n/a	?/-	n/a	?	n/a	?	n/a	n/a	?	?	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?/-	?/+		n/a	?/-	n/a	?	n/a	?	n/a	n/a	?	?	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?/-	?/+		n/a	?/-	n/a	?	n/a	?	n/a	n/a	?	?	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	I		n/a	I	n/a	I	n/a	I	n/a	n/a	I	I	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	n/a	L/ GL	n/a	L/ GL	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	?/-	?/-	n/a	n/a	O	?/-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	?/-	?/-	n/a	n/a	O	?/-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	?/-	?/-	n/a	n/a	-	?/-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	n/a	D	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	?/-	?/-	O		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	?/-	?/-	O/-		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	?/-	?/-	-		-				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.4.4 Option 4: Affordable homes

### Option description

This option's focus is to deliver affordable homes, concentration on social and target rents at the expense of the total quantum of housing.

### Appraisal and recommendations

By increasing the equity of access to other opportunities in London, including education and employment, this option would facilitate improvements to health and wellbeing of Londoners. An increase in housing security and ownership would have positive health and wellbeing effects and new housing will conform to high standards, reducing health risks such as mould, damp or cold. This option would also help to alleviate homelessness and overcrowding issues.

This option would also positively support economic and employment. It supports the interconnected nature of the economy and housing market by facilitating the delivery of affordable homes, ensuring all kinds of workers, including shift workers, care workers or cleaners, can afford to live in London. This would increase the available labour force in London and support the London economy remaining diverse and productive.

This option supports the delivery of housing whilst making appropriate use of London's available brownfield sites and promoting local regeneration. Supporting infrastructure would also be delivered alongside new homes through planning conditions, potentially providing social, environmental and physical infrastructure for local areas.

### Recommendations

It was recommended that this option consider all needs in the economy. Focusing purely on affordable homes would limit the delivery of market housing and specialist housing. This option should ensure that the need of local communities is understood to find a balance between the delivery of all types of housing.

### GLA response

The preferred option is a combination of the four assessed options. The preferred option supports the delivery of a diverse range of housing, including affordable housing, specialist housing and market housing.

Table 34: GG4 Option 4: Affordable homes

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						?	+		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	+		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	+		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I/D	I		n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	++	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	++	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I	I	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	+	+	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	+	+	++		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.4.5 Preferred option

### Option description

This option aims to improve the wider housing market for all Londoners. It seeks to increase the number of homes on the market, particularly affordable homes and ensure new homes meet high standards. This option aims to ensure developments and housing are inclusive, supporting wider community needs but also identifying specific needs for more specialist housing. This option considers the use of both large-scale developments and also small sites, to increase housing stock locally and support smaller building businesses.

### Appraisal and recommendations

This option seeks to improve resident choices and support diversity across London. The provision of genuinely affordable housing will allow people to live in London and access the wide range of employment and educational opportunities London has to offer. This option would be very beneficial for health, reducing feelings of isolation and severance and meeting the needs of groups with health conditions. This option identifies the need for high quality housing, which would reduce risk of mould, damp and cold.

This option supports the delivery of housing across London, in small and larger sites, using all available brownfield sites appropriately. This option would facilitate the delivery of supporting infrastructure alongside housing, including social and transport infrastructure. It seeks to ensure new homes and developments are well connected across London, identifying the important role transport infrastructure has in reducing severance and unlocking opportunities across London.

Although this option focuses on the delivery of housing, it plays a crucial role in supporting the wider economy of London. The lack of affordable housing can act a key barrier to other opportunities, particularly employment, as it risks pricing key workers out of London, and education. This option also supports regeneration opportunities around town centres, contribution to job creation and associated benefits. The use of smaller brownfield sites also supports much smaller construction businesses, helping SMEs to thrive and diversifying the economy further.

### Recommendations

It was recommended that alongside the variety of supporting infrastructure outlined in this option, that energy infrastructure also be considered. New developments can provide opportunities to increase energy efficiency through methods such as on-site energy generation and greener energy choices.

### Implications for the HRA

Outcome of the HRA screening showed no likely significant effects. The policy does not provide for any location, quantum of housing development.

Table 35: GG4 Delivering the homes London needs

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						++	+		+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						++	+		+	++	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						D	I		I	I/D	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	++	++	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	++	++	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	D	I	I	I	I/D	I/D	I	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	++		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.5 GG5 Growing a good economy

### 8.5.1 Option 1: Investment in infrastructure

#### Option description

This option emphasises the need to invest in workspaces and infrastructure of different types and sizes. It supports economic growth in the Central Activities Zone (CAZ), town centres and across industrial locations.

#### Appraisal and recommendations

This option supports the delivery of key infrastructure to increase employment opportunities across London. The provision of workspaces of different types and sizes would support SMEs, increasing diversity within the economy as many of these are run by BME groups. Employment can be associated with positive health and wellbeing by increasing feelings of fulfilment and financial security for individuals. Investment in infrastructure would also be beneficial for the wellbeing of communities through the delivery of social infrastructure, such as community centres or health and social care facilities.

This option positively supports economic growth and competitiveness, delivering new infrastructure to facilitate the growth of existing businesses and new businesses. A range of workspace types would help ensure there is space for a variety of businesses, increasing diversity in the economy. Growth would also be encouraged across London in this option, supporting growth in traditional economic centres and in more local economies. This can increase access to employment, particularly for those who are less mobile and rely on their local economies for work and service provision. The provision of digital infrastructure would also support increased flexibility for workers and help businesses function in a modern, technology-based market. The long-term economic viability of this option is however uncertain as it does not consider affordability of infrastructure, particularly office space and housing.

This option would facilitate investment in a variety of different infrastructure to ensure businesses and communities are supported. This could include workspace, housing and social infrastructure.

#### Recommendations

It was recommended that this option considers affordability of infrastructure. Without affordable workspace, smaller businesses may not be sustainable in the competitive London economy. In terms of housing, a lack of affordable housing may drive key workers out of London, limiting the available labour force.

#### GLA response

The preferred option is a combination of the four appraised options. The preferred option contains elements of this option, promotion the delivery of key infrastructure, particularly social infrastructure across London, and that the provision of employment space is sufficient and in the right locations to suit local need.

Table 36: GG5 Option 1: Investment in infrastructure

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	n/a		+	+/?	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	n/a		+	+/?	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						+	n/a		+	++ /?	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						D	n/a		I/D	D	D	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						P	n/a		P	T/P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	n/a	n/a	+	?/+	n/a	+	+	+/?	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	+	?/+	n/a	+	+	+/?	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	+	?/+	n/a	+	+	+/?	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	n/a	n/a	I/D	D	n/a	D	I/D	D	D	I	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	P	n/a	P	P	T/P	P	P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I/D	I/D	I/D		I/D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.5.2 Option 2: Dispersed growth

### Option description

This option aims to facilitate dispersed growth across London, focusing on local economies. It also aims to protect and enhance existing workspaces across London.

### Appraisal and recommendations

Through encouraging dispersed growth, this option would deliver some social benefits. It supports the provision of employment and services locally, which may benefit groups who are less mobile and may need to be close to specific services, which could have wider benefits of reducing isolation in the community. However, dispersed growth may make it harder to ensure the provision of physical and social infrastructure to meet all needs. Appropriate infrastructure could not be provided in all locations, as it would not be cost-effective or sustainable. Similarly, on certain types of employment would be provided in different locations, and therefore access to employment locally would only support specific groups.

This option may also not deliver transport benefits. As employment and services would also be dispersed across London, more complex transport patterns would arise. This may reduce connectivity and accessibility for individuals, particularly those who are less mobile. Complex transport patterns could also result in individuals driving more, resulting in increased emissions and poorer air quality.

This option would support the provision of some local economic benefits as it would deliver some employment and services at a local level. However, London's traditional economic centres, particularly the CAZ and NIOD are very important for the global competitiveness of London and should be supported and enhanced alongside local growth.

Dispersed growth however may limit the integration of infrastructure and transport due to the lack of one major centre. However, this option does support a more efficient use of land, promoting high densities and small pockets of land.

### Recommendations

It was recommended that this option consider the provision of affordable workspace. Providing appropriate workspace is important but this workspace would need to be affordable to support smaller businesses and start-ups.

Traditional economic centres and large scale developments contribute significantly to the London economy and it was recommended that this option considers the need for dispersed growth alongside the enhancement of local economic centres.

### GLA response

The preferred option is a combination of the four assessed options. The preferred option contains elements of this option, promoting the importance of local town centres as part of economic growth and ensuring sufficient industrial and employment space in the right locations. The preferred option however promotes the enhancement of more traditional economic centres alongside local growth.

Table 37: GG5 Option 2: Dispersed growth

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?/-	?		-	-/?	?/-	n/a	n/a	-/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-/?	n/a
Medium Term						?/-	?		-	-/?	?/-	n/a	n/a	-/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-/?	n/a
Long Term						?/-	?		-	-/?	?/-	n/a	n/a	-/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-/?	n/a
Direct / Indirect						I/D	I/D		I/D	I/D	I/D	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						L	L		L	L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a
<b>EQIA</b>																								
Short Term	O/+	O/+	O/+	n/a	n/a	?	?	-/?	-	?	?/-	n/a	n/a	-/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	O/+	O/+	O/+	n/a	n/a	?	?	-/?	-	?	?/-	n/a	n/a	-/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	O/+	O/+	O/+	n/a	n/a	?	?	-/?	-	?	?/-	n/a	n/a	-/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I/D	I/D	I/D	n/a	n/a	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	L	L	L	L	L	L	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	O/+	O/+	O/+		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	O/+	O/+	O/+		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	O/+	O/+	O/+		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		n/a				n/a	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 8.5.3 Option 3: Market forces

#### Option description

This option aims to leave growth to market forces to determine the type and nature of employment space that is retained and provided.

#### Appraisal and recommendations

Implementation of this option would have negative social impacts. This option would not support more vulnerable groups, such as low-income, minority or disabled individuals, who may need assistance overcoming perceived or actual barriers to education or employment. This would limit opportunities, particularly at a local level, and could negatively impact health and wellbeing by increasing financial insecurity and reducing the sense of fulfilment and social networks often gained from employment and education.

Housing affordability in London is a key issue and without the delivery of affordable housing, low-income groups could be priced out of London. By leaving economic growth to market forces, there is a risk that housing demand would not be met, affordable housing delivery would be insufficient and the balance between the provision of economic land and housing land not appropriately managed. Markets also fluctuate and can be unpredictable. A market-led approach may therefore focus on immediate demand and not consider long-term need.

This option would seek to ensure the continued support of London's productive and competitive economy, which offers a diverse range of employment opportunities. It would meet immediate global demand and support the London economy remaining competitive amongst the global economy. Without some intervention or provisions however, existing issues would remain and potentially worsen. In particular, the lack of affordable workspace and housing across London is a key issue and without direct support, it limits the viability of smaller and newer businesses and potentially prices key workers out of London. It may also limit the creative and cultural industries which can struggle to afford appropriate work spaces. This option would also limit the distribution of economic growth equally. More vulnerable groups would need assistance to overcome barriers to employment and without support, severance and isolation could increase.

Environmental aspects such as air quality and flood risk are not considered in this option, but can influence the economy. Poor air quality has associated health impacts which can be costly for the health service and for businesses due to a loss in productivity and flooding can result in extensive clear up costs. Without intervention, air quality and flood risk could remain issues and have economic and social impacts. Air quality is also often poorer in more deprived areas.

#### Recommendations

It was recommended that this option consider the wider needs of people and that intervention and specific support is needed for more vulnerable groups. This would include ensuring the delivery of affordable housing and workspace, and ensuring more vulnerable groups have support in accessing employment and educational opportunities. This option could also consider environmental aspects, such as air quality and flood risk, and their impact on the economy and more deprived areas.

#### GLA response

The preferred option is a combination of the four appraised options. The preferred option emphasises ensuring the benefits of economic success are shared equitably across London, support access to employment and educational opportunities and deliver social infrastructure to meet local needs.

Table 38: GG5 Option 3: Market forces

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						?	n/a		n/a	?	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	n/a		n/a	?	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	n/a		n/a	?	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a		n/a	D	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	O/-	O/-	O/-	n/a	-	?	n/a	n/a	n/a	?	n/a	n/a	-	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	O/-	O/-	O/-	n/a	-	?	n/a	n/a	n/a	?	n/a	n/a	-	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	O/-	O/-	O/-	n/a	-	?	n/a	n/a	n/a	?	n/a	n/a	-	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I	n/a	n/a	n/a	D	n/a	n/a	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	O/-	O/-	O/-		O/+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	O/-	O/-	O/-		O/+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	O/-	O/-	O/-		O/+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 8.5.4 Option 4: Affordable workspace

### Option description

This option emphasises the delivery of affordable workspace, particularly in areas where cost pressures are high.

### Appraisal and recommendations

Implementation of this option promotes equal opportunities and growth, supporting SMEs and start-up companies in London, many of which are owned by BME groups. Affordable workspace would also support cultural and creative industries which usually need more support to find appropriate workspace. This would also contribute to increasing wider employment opportunities within London and diversifying the economy, ensuring different industries can thrive in the capital. This option would directly manage a key issue within the London economy as many smaller businesses are priced out of London due to high running costs.

### Recommendations

It was recommended that this option consider the size and type of workspace alongside affordability to ensure that the needs of businesses and industries are met.

### GLA response

The preferred option is a combination of the four appraised options. The preferred option considers much broader issues, including diversifying the economy and ensuring industrial and employment space is sufficient and in the right places. The preferred option also aims to ensure economic success is shared equitably and to support traditional economic centres alongside local town centres.

Table 39: GG5 Option 4: Affordable workspace

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	n/a		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	n/a		n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I/D	n/a		n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	n/a	+/?	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	+/?	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	n/a	n/a	n/a	+/?	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I/D	I/D	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.5.5 Preferred option

### Option description

This option aims to conserve and enhance London's economy. It seeks to ensure London's economy continues to diversify, industrial and employment space is sufficient and benefits from economic success is shared equitably. The option also promotes continued growth in education, innovation and research and the development of a 24 hour city. Lastly, this option highlights the need to promote the wider city region and town centres across London, in addition to continuing the success of key economic zones in the Central Activities Zone (CAZ) and Northern Isle of Dogs (NIOD).

### Appraisal and recommendations

This option seeks to increase opportunities across London and ensure equity in economic success. This option would increase employment and education opportunities, and encourage the development of important social and transport infrastructure. The reduction in economic inequality would help to reduce inequalities in other aspects, including health. Providing people with a sense of fulfilment, financial security and social infrastructure and networks can positively impact health and wellbeing. This option seeks to ensure that London's culture of tolerance and acceptance are maintained to drive growth and economic competitiveness.

Providing access to education and employment could also help to educate people about crime and provide them with financial security, which could contribute to reducing crime levels.

This option acknowledges the interconnected nature of the economy and housing market, and by ensuring that employment and industrial growth occurs in the right locations would facilitate associated housing growth. This option also supports the growth of smaller town centres and local regeneration which would contribute to the support of local housing need.

The integration of different land uses and delivery of important social and transport infrastructure would ensure growth in the wider economy. It's drive for growth to occur in the 'right locations' will make the best use of available land and ensure development is appropriate and beneficial for the local area.

This option aims to ensure new infrastructure is modern, reliable and accessible. It seeks to deliver digital connectivity across London, promoting business in a modern world and allowing more flexible home-working to suit the needs of employees. This option strives for an efficient and reliable transport network which would benefit the wider economy, reducing barriers to employment and connecting business and industry with the rest of the country and the world.

This option would increase productivity and diversity in the economy by continuing investment in opportunities, infrastructure and sub-economies. This includes investing in education and research, the cultural industry and developing a 24 hour economy. This option would remove barriers to employment and financial security by ensuring growth is shared throughout London. Investing in both the traditional economic centres of London and in town centres, will bring stimulate localised growth and employment, supporting those groups who may not be able to travel as far due to physical restrictions or the need to be near health services or schools.

The protection and enhancement of important historic and cultural assets would also be an important aspect of economic growth, ensuring London's vital character is protected to attract businesses, residents and tourists.

The option could have negative effects on local noise level, particularly through the development of a 24 hour economy. However, this aspect could be managed at a local level.

### Recommendations

It was recommended that this option consider the provision of affordable workspace. In particular, this will support small and medium enterprises (SMEs) and start-ups. Many SMEs are owned by BME groups, therefore supporting SMEs could further diversify the economy.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a broad policy relating to London's economy. Whilst it is noted that economic growth has potential to impact upon European designated sites (atmospheric pollution and water resource conflicts). This policy does not explicitly provide for development, it merely provides criteria for the Mayor and partners.

Table 40: GG5 Sharing London’s growing economy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	+	+	+/+	n/a	+/?	n/a	n/a	n/a	n/a	+	n/a	n/a	?
Medium Term						+	+		+	++	+	+	+	+/+	n/a	+/?	n/a	n/a	n/a	n/a	+	n/a	n/a	?
Long Term						+	+		+	++	+	++	+	+/+	n/a	+/?	n/a	n/a	n/a	n/a	+	n/a	n/a	?
Direct / Indirect						D	D		D	D	I	D	D	I	n/a	D	n/a	n/a	n/a	n/a	D	n/a	n/a	D
Temporary / Permanent						P	P		P	T/P	T/P	P	P	P	n/a	P	n/a	n/a	n/a	n/a	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	L/ GL /W	L	L/ GL /W	L/ GL	L/ GL /W	n/a	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+/?	+	+	+	+	+	+	+	+/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Medium Term	+	+	+	n/a	+	+/?	+	+	+	+	+	+	+	+/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Long Term	++	++	+	n/a	+	+/?	+	+	+	+	++	++	+	+/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Direct / Indirect	I/D	I/D	I/D	n/a	I	I	I	D	D	D	I	D	D	I	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	P	T/P	T/P	P	P	P	n/a		n/a	n/a	n/a	n/a	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W	n/a	L	L	L/ GL	L/ GL	L/ GL	L/ GL /W	L/ GL /W	L/ GL /W	L/ GL	L/ GL /W	n/a		n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		+				+	+				+/+	n/a		n/a	n/a		n/a	+	n/a		?
Medium Term	+	+	+		+				+	+				+/+	n/a		n/a	n/a		n/a	+	n/a		?
Long Term	+	+	+		+				+	+				+/+	n/a		n/a	n/a		n/a	+	n/a		?
Direct / Indirect	I	I/D	D		I				D	I				I	n/a		n/a	n/a		n/a	D	n/a		I/D
Temporary / Permanent	P	P	P		P				P	T/P				P	n/a		n/a	n/a		n/a	P	n/a		T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL	L/ GL /W		L/ GL				L/ GL	L/ GL /W				L/ GL /W	n/a		n/a	n/a		n/a	L/ GL	n/a		L
<b>CSIA</b>																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I					I															
Temporary / Permanent				P					P															
Local / Greater London / Wider Region / Global				L/ GL					L/ GL															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London’s geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.6 GG6 Increasing efficiency and improving resilience

### 8.6.1 Option 1: Climate change mitigation

#### Option description

This option focuses on climate change mitigation as a priority, with a significant focus on carbon reduction principles.

#### Appraisal and recommendations

Implementation of this option would support economic benefits in the long-term. It would significantly contribute to reducing the impacts of climate change in London, particularly by reducing carbon emissions and promoting a zero carbon economy. By improving local air quality and climate this option would support improvements to health. It would also help to reduce differentials in life expectancy as air quality is often poorer in more deprived areas. However in the short-term this option may not be very positive as it does not consider short-term resilience to manage immediate threats, such as flooding. This can be very costly for the economy due to clean up and rebuilding and associated disruption to business and productivity.

This option would positively affect climate change and air quality, but only in the long-term. As discussed above, decarbonising the economy would be positive for reducing climate change, but changes would take a long time to occur and in the short-term, London is still at risk from immediate issues, particularly flood risk. Therefore, flood risk could be negatively affected by this objective in the short to medium term.

#### Recommendations

It was recommended that this option increase its scope to consider short-term resilience alongside long-term mitigation. Without intervention, residents and businesses are vulnerable to the immediate threats of extreme weather, including flooding and excessive heat.

#### GLA response

The preferred option is a combination of the four appraised options. The preferred option is much broader, aiming to improve London's resilience to both environmental and safety threats. In line with this option, it aims to build resilience and drive a low carbon economy, but also ensuring buildings and infrastructure can manage immediate threats from extreme weather.

Table 41: GG6 Option 1: Climate change mitigation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	-	n/a	n/a	n/a	O	n/a	-	+	n/a	-	+	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	n/a	n/a	n/a	+	n/a	+	+	n/a	-	+	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	n/a	n/a	n/a	++	n/a	++	+	n/a	O	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	D	n/a	n/a	n/a	D	n/a	D	D	n/a	I	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	n/a	n/a	n/a	T/P	n/a	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/GL /W	n/a	n/a	n/a	L/GL /W	n/a	L/GL /W	L/GL /W	n/a	L/GL /W	L/GL /W	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a		D	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a		L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	O		n/a				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				++	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				D	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL /W		n/a				n/a	n/a				L/GL /W	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.6.2 Option 2: Climate change adaptation

### Option description

This option focuses on climate change adaptation as priority. It outlines a focus on resilience, particularly reducing flood risk, ensuring the design of buildings is resilient to risks, reducing overheating and extreme cold and reducing fuel poverty.

### Appraisal and recommendations

Implementation of this option would support economic benefits in the short to medium term. This option seeks to protect London against the impact of climate change, including flooding and excessive heat. These risks can be costly due to healthcare costs, clean-up costs and costs associated with a loss of productivity and businesses after extreme weather events. However, in the long-term this option may have less economic benefits as it does not consider the underlying causes of climate change and how managing these could also help reduce risk. For example, reducing emissions and having a zero-carbon economy would help to reduce the wider impacts of climate change and improve air quality, which is often worse in the most deprived areas. Similarly, this option supports immediate flood risk management, but in the long-term the causes of increased flooding would still not be addressed and infrastructure to build resilience, such as flood defences, would need to be continually replaced and improved.

This option aims to ensure housing can be resilient to climate change and are built to a high quality. This would help to reduce the risk of ill-health caused by poor quality housing, particularly damp, cold and mould. This would particularly support the most deprived areas where poor quality housing is often more prevalent. Furthermore, by increasing the energy efficiency of new homes, fuel poverty would be managed across London, which can be linked to health and wellbeing by increasing stress.

This option ensures new buildings, including homes, are resilient, sustainable and of a high quality. However, a balance would need to be found with heritage protection to ensure that the retrofitting of buildings to build resilience does not undermine the viability of heritage assets in London.

This option would also encourage the protection of natural capital as an important asset which can help manage climate change. Green spaces and trees can act as carbon sinks and intercept flood waters, both of which can help build to build resilience in London.

### Recommendations

It was recommended that this option increase its scope to consider long-term mitigation alongside short-term resilience. Without understanding and addressing the wider causes of climate change, London would remain under threat from extreme weather and costs of managing this would continue to rise.

### GLA response

The preferred option is a combination of the four appraised options. The preferred option is much broader, aiming to improve London's resilience to both environmental and safety threats. In line with this option, it aims to ensure that buildings and infrastructure can manage and survive immediate threats from extreme weather. However the final option also considers the underlying causes of climate change and supports a low carbon and circular economy to reduce associated emissions and waste.

Table 42: GG6 Option 2: Climate change adaptation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	+	n/a	n/a	++	++	n/a	+	n/a	++	+	?/-	n/a	n/a	n/a
Medium Term						n/a	+		n/a	+	+	n/a	n/a	+	+	n/a	+	n/a	+	+	?/-	n/a	n/a	n/a
Long Term						n/a	+		n/a	O/-	+	n/a	n/a	O	O	n/a	+	n/a	O	+	?/-	n/a	n/a	n/a
Direct / Indirect						n/a	I		n/a	D	I	n/a	n/a	D	D	n/a	D	n/a	D	I	I	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		n/a	T/P	T/P	n/a	n/a	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L		n/a	L/GL /W	L	n/a	n/a	L/GL /W	L/GL /W	n/a	L	n/a	L/GL /W	L	L	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	++		+	n/a	n/a	+	?/-	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	+	?/-	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	O		+	n/a	n/a	+	?/-	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	D		D	n/a	n/a	I	I	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	L/GL /W		L	n/a	n/a	L	L	n/a	n/a	n/a
<b>HI</b>																								
Short Term	n/a	+	n/a		+				n/a	n/a				++	++		+	n/a		+	?/-	n/a		n/a
Medium Term	n/a	+	n/a		+				n/a	n/a				+	+		+	n/a		+	?/-	n/a		n/a
Long Term	n/a	+	n/a		+				n/a	n/a				O	O		+	n/a		+	?/-	n/a		n/a
Direct / Indirect	n/a	I	n/a		I				n/a	n/a				D	D		D	n/a		I	I	n/a		n/a
Temporary / Permanent	n/a	T/P	n/a		T/P				n/a	n/a				T/P	T/P		T/P	n/a		T/P	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	L/GL /W	n/a		L/GL /W				n/a	n/a				L/GL /W	L/GL /W		L	n/a		L	L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 8.6.3 Option 3: Safe designed city

#### Option description

This option focuses on security and safety within London, aiming to protect residents against threats including terrorism, crime and fire.

#### Appraisal and recommendations

This option prioritises safety and security across London. Crime and perception of crime can reduce people's willingness to engage in activities and socialise, leading to increases in isolation and a decline in active lifestyles, negatively impacting health and wellbeing. This would also impact important economies, particularly tourism and the night-time economy, which rely on people feeling safe to engage in opportunities and activities London offers and contribute to the economy. If London is considered an unsafe or unsecure city, it would also reduce its appeal as an important centre for business and risk companies and industries moving elsewhere. The measures in this option would therefore help protect vulnerable groups, residents and visitors across London.

This option promotes high quality design and methods to design out crime. This would help ensure public places and existing housing is improved, to increase safety and perceptions of safety. This option promotes collaborative planning to ensure homes and public spaces remain safe. This is particularly important for more deprived areas, which can be disproportionately affected by poor quality design of housing and the local environments.

#### Cumulative

This option aligns with policies D11, D10 and D7 which support the creation of safe and secure places within London.

#### GLA response

The preferred option is a combination of the four appraised options. The preferred option is much broader, aiming to improve London's resilience to both environmental and safety threats. However, the focus and aims of this option are all replicated in the final option, which seeks to decrease crime and improve safety throughout London to ensure London remains an attractive, vibrant and productive city.

Table 43: GG6 Option 3: Safe designed city

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+/?		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	+/?		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	+/?		n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	D		n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	++	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	D	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				++					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL /W					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.6.4 Option 4: Resource efficiency

### Option description

This option aims to promote circular economy models and innovation throughout London to reduce waste and improve resource management. The option supports better co-ordination with and between key infrastructure providers within London.

### Appraisal and recommendations

The implementation of this option would support economic benefits, particularly in the long-term. By driving circular economies, this option seeks to improve resource efficiency and reduce waste, both of which are costly for London, and both resources and space for waste are finite. This ensures that this option also has very positive impacts on material and waste policies by minimising waste and improving resource management. This option would also support the delivery of important infrastructure by encouraging co-ordination between key infrastructure providers. This would help to promote the delivery of key infrastructure across London in a more sustainable and efficient way.

This option seeks to deliver environmental benefits. The transportation of materials and waste contributes significantly to emissions, causing negative impacts on air quality and increase local noise. Moreover, this option would support the protection of natural resources, such as trees and woodlands, which would improve natural capital and local air quality.

### GLA response

The preferred option is a combination of the four appraised options. The preferred option is much broader, aiming to improve London's resilience to both environmental and safety threats. This final option includes the aims outlined in this option, ensuring that a circular economy model is followed to reduce waste and maximise resource efficiency.

Table 44: GG6 Option 4: Resource efficiency

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	++	n/a
Long Term						n/a	n/a		n/a	++	++	n/a	n/a	+	n/a	+	++	n/a	n/a	n/a	n/a	n/a	++	n/a
Direct / Indirect						n/a	n/a		n/a	I/D	D	n/a	n/a	D	n/a	D	D	n/a	n/a	n/a	n/a	n/a	D	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a	L/GL /W	L/GL /W	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	++	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	D	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				+	n/a		?/+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				+	n/a		?/+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				+	n/a		?/+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				D	n/a		I	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				T/P	n/a		T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L/GL /W	n/a		L/GL	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.6.5 Preferred option

### Option description

This option aims to increase London's efficiency and resilience in terms of environmental and safety threats. The option seeks to improve energy efficiency, targeting a low carbon and circular economy. Buildings and infrastructure should be designed to adapt to climate change, and risks such as flooding and heat should be appropriately managed. This option also strives to create a safe and secure city, building resilience against threats including fire and terrorism. The approach to efficiency and resilience should be integrated and inclusive, ensuring public, private, community and voluntary sectors plan and work collaboratively.

### Appraisal and recommendations

This option prioritises safety and security across London. Crime and perception of crime can reduce individual's willingness to engage in activities and socialise, leading to increases in isolation and a decline in active lifestyles, negatively impacting health and wellbeing. The measures in this option would therefore help protect vulnerable groups, residents and visitors across London. Protection against risks such as excess heat is also an important part of this option, especially for more vulnerable groups such as the elderly. Excessive heat would have serious health consequences and ensuring the built environment would help build resilience against this.

This option would have economic benefits. Natural disasters such as flooding can be costly, both in terms of cleaning up after the events and disruption to business and productivity. Improving crime and the perceptions of crime would help to ensure London remains an attractive city for living, working and visiting. Economic models such as zero-carbon and circular economy would also have economic benefits, reducing associated waste and resource costs.

### Recommendations

This option supports ensuring the built environment is resilient to climate change and extreme weather. Much of this focuses on new buildings, and therefore it was recommended that this option considers how existing buildings could also be retrofitted to build resilience and support vulnerable communities.

### Implications for the HRA

Outcome of HRA screening showed no likely significant impacts. The provision of low polluting energy infrastructure is a position that has the potential to reduce atmospheric pollution contributions. It also provides for efficient water use which has the potential to reduce the requirement for increased abstraction to support the increased development.

Table 45: GG6 Increasing efficiency and improving resilience

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+/?		n/a	+	+	n/a	n/a	+	+	+	+	n/a	+	+	n/a	n/a	+	n/a
Medium Term						n/a	+/?		n/a	+	+	n/a	n/a	+	+	+	+	n/a	+	+	n/a	n/a	++	n/a
Long Term						n/a	+/?		n/a	++	++	n/a	n/a	+	+	++	++	n/a	+	+	n/a	n/a	++	n/a
Direct / Indirect						n/a	I/D		n/a	I/D	I/D	n/a	n/a	D	D	D	D	n/a	D	D	n/a	n/a	D	n/a
Temporary / Permanent						n/a	T/P		n/a	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	L/GL /W	L/GL /W	L/GL /W	n/a	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	n/a	+	n/a	n/a	n/a	+	n/a
Medium Term	+	+	+	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	n/a	+	n/a	n/a	n/a	+	n/a
Long Term	+	+	+	++	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	n/a	+	n/a	n/a	n/a	++	n/a
Direct / Indirect	I/D	I/D	I/D	D	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	D	D		D	n/a	D	n/a	n/a	n/a	D	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	L/GL /W		L/GL /W	n/a	L/GL /W	n/a	n/a	n/a	L/GL /W	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				+	+		+	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				+	+		+	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		n/a				n/a	n/a				+	+		+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		n/a				n/a	n/a				D	D		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	T/P		T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W		n/a				n/a	n/a				L/GL /W	L/GL /W		L/GL /W	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				++					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL /W					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9 Assessment of the London Plan policies

### 9.1 Spatial development patterns

#### 9.1.1 SD1 Opportunity Areas

##### Policy description

The policy seeks to ensure that Opportunity Areas (OAs) fully realise their growth and regeneration potential. It also outlines how local planning authorities, through Development Plans and decisions, should support and deliver development and infrastructure growth for OAs. This includes the need to plan for social infrastructure, meet housing and employment needs, support and sustain industrial capacity, consider regeneration needs, integrate development into the wider area, and work with local communities and other stakeholders.

##### Initial appraisal and recommendations

###### Social, economic and environmental effects

Opportunity Area Planning Frameworks (OAPFs) must be prepared in a collaborative way with local communities and stakeholders, helping to ensure that change in these places contributes to the wellbeing of local communities. The delivery of OAs would support residential and employment growth in strategic locations which can help to remove barriers to social and economic opportunities, meet the need for new housing, including affordable housing, and improve overall life chances of existing and new residents. OAPFs also ensure the delivery of social infrastructure, which can meet the needs of Londoners by increasing access to key services and facilities.

This policy facilitates the delivery of high density, affordable homes which deliver mixed and inclusive communities. The delivery of affordable homes can support individuals to live and work in the city, access education and services, and help to alleviate overcrowding. New homes must conform to high design standards, which also contribute to a range of health and wellbeing outcomes. The efficient use of brownfield land helps to optimise limited land resources in London, and support wider housing delivery objectives. This could include facilitating the delivery of high-density housing, alongside a range of supporting social and physical infrastructure. The policy encourages wider regenerative benefits, placing emphasis on developing local character and identity, even within large-scale developments.

The policy supports collaboration with agencies such as TfL, to effectively identify where growth is needed, and help to set ambitious transport mode share targets. The development of high-density housing and other uses in well-connected locations would encourage sustainable travel by walking, cycling and public transport. More sustainable forms of public transport are likely to reduce emissions and facilitate improvements to air quality. The delivery of key infrastructure and housing supports employment growth potential in these strategic locations. The policy also supports local and strategic regeneration and employment opportunities to achieve inclusive growth and tackle inequalities.

##### Cumulative

This policy complements T1 Strategic approach to transport, S1 Developing London's social infrastructure and G1 Green infrastructure which support the provision of strategic transport and social and green infrastructure. This policy could conflict with SD4 The Central Activities Zone (CAZ) by spreading economic opportunities outside of traditional growth locations.

##### Recommendations

It was recommended that further information could be provided on inclusive transport access, including details on how active transport networks connect residential developments with key social infrastructure. It was also suggested that further reference to the housing needs of less mobile communities could be further drawn out in the policy. It was also recommended that further detail is provided on the measures that will be taken to support green spaces and mitigate the impact of climate change, for example, whether targets are in place to improve air quality. It was also recommended that further reference could be made as to how such infrastructure provision could benefit existing communities, as well as new developments within growth corridors and opportunity areas.

##### GLA response

The GLA advised the purpose of this policy is to draw out any spatially specific considerations that apply to OAs generally and that other policies in the rest of the Plan would also apply; therefore, policies such as public realm, inclusive design, social infrastructure, air quality, green and open space, Healthy Streets and other transport policies addressed issues such as active travel, inclusive design, air quality, provision of open space in more detail. In addition, other GLA strategies provide further details on some of these issues. The GLA further advised that new infrastructure could benefit existing communities in different ways depending on the specific infrastructure provided. This will vary according to the specific circumstances of each OA and is better expressed within OAPFs themselves.

##### Appraisal of finalised policy

Some aspects of the policy were changed in the final draft, including the removal of specific reference to accessible and healthy spaces. Therefore, a number of the environmental objectives were changed to a neutral/positive scoring. However the policy still promotes regeneration and the removal of environmental, economic and social barriers, which broadly support these objectives. The policy instead makes reference to SD10 Strategic and Local Regeneration, which covers specific detail.

##### Implications for the HRA

The HRA screening showed no likely significant effects. OAs are relatively remote from European sites and the overall focus on the role of the London Plan relates to the improvement/delivery of sustainable public transport, which will be positive for air quality. Delivery of Crossrail 2 and the Trams Triangle proposals may be positive for air quality at Wimbledon Common SAC by removing vehicles from the local road network. The planning framework for Stoke Newington and Blackhorse Lane needs to avoid a significant increase in road freight traffic through Epping Forest SAC, by maximising connectivity to the strategic rail network.

Table 46: SD1 Opportunity Areas

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+/?		+	+	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	n/a	+/?	+	n/a	n/a
Medium Term						+	+/?		+	+	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	n/a	+/?	+	n/a	n/a
Long Term						++	+/?		+	++	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	n/a	+/?	+	n/a	n/a
Direct / Indirect						I	I		I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I	n/a	I/D	n/a	I	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/ GL	L/ GL	L/ GL	n/a	n/a	L	L/ GL /W	L	L	n/a	L/ GL	n/a	L	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Medium Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Long Term	+	+	+	?	++	++	?	+	++	++	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	D	I	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D		n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL /W		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L/ GL
<b>HIA</b>																								
Short Term	+	+	+		+				+	n/a				O/+	O/+		O	n/a		O/+	n/a	n/a		+
Medium Term	+	+	+		+				+	n/a				O/+	O/+		+	n/a		O/+	n/a	n/a		+
Long Term	+	+	+		++				+	n/a				O/+	O/+		+	n/a		O/+	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	n/a				I/D	I/D		D	n/a		D	n/a	n/a		D
Temporary / Permanent	P	P	P		P				T/P	n/a				T/P	T/P		P	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W		L/ GL /W				L/ GL /W	n/a				L/ GL /W	L/ GL /W		L/ GL /W	n/a		L/ GL /W	n/a	n/a		L/ GL /W
<b>CSIA</b>																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/ P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.1.2 SD2 Collaboration in the Wider South-east (WSE)

### Policy description

The policy supports a strategic approach to governance, to enhance the understanding of regional and sub-regional economic, social, and environmental challenges and opportunities. It also aims to emphasise the role of WSE partners in collaboration with the Mayor, to address shared concerns regarding housing and infrastructure, the environment, and industrial capacity.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The collaborative mechanisms that this policy sets out would facilitate and co-ordinate improvements to accessibility and connectivity within and around London. There is a strong emphasis on the role of strategic public transport to underpin growth, through the development of growth corridors and increased rail capacity. The policy identifies a need to strategically manage challenges, such as addressing barriers to housing. This could play a role in meeting the housing needs of London and the wider region to alleviate pressures such as overcrowding and homelessness. The substitution of some industrial functions may help to enable the delivery of homes by increasing the availability of land and support wider economic growth across the wider region.

Implementation of the policy would result in positive effects on the provision of infrastructure and economic competitiveness. It would help to ensure land is used in a sustainable manner, integrating new developments with good transport access. The co-ordinated provision of high quality transport infrastructure would also help to mitigate adverse impacts associated with high density development. This policy also ensures that the delivery of housing, business and infrastructure is in strategic locations where mutual benefits can be achieved.

Improvements to public transport infrastructure would help reduce public car use and associated emissions. This could contribute to a reduction in carbon and promote a low-carbon economy, in addition to a reduction in noise pollution. This policy also outlines the need to collaborate on cross-border environmental issues including waste management, flood risk and climate change.

#### Cumulative

This policy complements policies E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function, T3 Transport capacity, connectivity and safeguarding and G5 Urban greening, which support the increase in construction, industrial activity and the enhancement of green spaces. This policy may create positive economic effects through investment in transport and other infrastructure.

#### Recommendations

It was recommended that further reference could be provided on affordable and adaptable housing, to ensure that a range of housing needs are considered across the wider region. Details on other types of supporting infrastructure, such as health and education provision, as well as the economic opportunities associated with housing and infrastructure delivery, could also be considered.

It was recommended that the policy could extend its scope to include air quality as an issue London and the wider region could manage together.

It was also recommended that further detail could be provided on sustainable opportunities associated with a co-ordinated approach to governance, for example referencing the Healthy Streets approach and green technologies.

### GLA response

Additional text was added to ensure strategic concerns were managed in a collaborative way with WSE partners. Additional text was also added to highlight air quality as a regional issue.

The GLA however clarified that issues such as education, health, open space provision are more cross boundary issues rather than WSE planning issues.

With regard to other recommendations, the GLA consider that it is more appropriate for further information and clarification to be provided through other policies within the London Plan, as well as alternative documents such as the London Environment Strategy.

### Appraisal of finalised policy

No further appraisal required as the amendment to the draft policy is not significant, the appraisal is therefore as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Part B of this policy promotes the joint preparation of evidence and encourages plan preparation by Authorities outside of GLA to take into account long term trends and mitigation. This could for example be a tool to encourage the London Boroughs around Epping Forest (Enfield, Redbridge and Waltham Forest) to work with the Essex authorities north of Epping Forest to manage air quality and recreational pressure issues associated with that SAC

Table 47: SD2 Collaboration in the Wider South-east and beyond

	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		+	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	+	+	+
Medium Term						+	n/a		+	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	+	+	+
Long Term						+	n/a		++	++	++	n/a	n/a	++	++	++	++	++	++	+	n/a	+	++	+
Direct / Indirect						D	n/a		D	D	D	n/a	n/a	D	I	I	I/D	D	D	D	n/a	D	D	I
Temporary / Permanent						P	n/a		P	P	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	P	P	T/P
Local / Greater London / Wider Region / Global						W	n/a		W	W	W	n/a	n/a	W	W	W	W	W	W	GL/W	n/a	L	W	W
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Direct / Indirect	n/a	n/a	n/a	n/a	D	I/D	n/a	D	D	I/D	D	n/a	n/a	n/a	I		n/a	D	D	n/a	n/a	n/a	I/D	I
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P		n/a	T/P	T/P	n/a	n/a	n/a	P	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	W	W	n/a	W	W	GL/W	GL/W	n/a	n/a	n/a	W		n/a	GL/W	GL/W	n/a	n/a	n/a	GL/W	W
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Medium Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Long Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				D	n/a		n/a	D		n/a	n/a	n/a		I
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				T/P	n/a		n/a	T/P		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		W				n/a	n/a				W	n/a		n/a	W		n/a	n/a	n/a		W
<b>CSIA</b>																								
Short Term				?					n/a															
Medium Term				?					n/a															
Long Term				?					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				W					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.1.3 SD3 Growth Areas in the Wider South-East (WSE) and beyond

#### Policy description

The policy supports the Mayor, together with Wider South East (WSE) partners, government and other agencies, to realise the growth potential of the wider city region and beyond.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

A co-ordinated approach to governance would support residential and employment growth in strategic locations in the WSE and potential beyond which can help to remove barriers to social and economic opportunities, meet the need for new housing and improve overall life changes to the region as a whole. This policy would ensure the delivery of transport and housing, alongside supporting infrastructure, can meet the needs of Londoners by increasing access to services and opportunities.

Co-ordinated approaches to governance would help to overcome barriers to infrastructure investment and delivery, including transport infrastructure, which would promote more sustainable patterns of growth across London and the wider city region, and beyond, and improve connectivity. Emphasis is placed on housing in sustainable locations, within proximity to existing or planned public transport.

This policy supports cross-border management and collaboration would facilitate the efficient and effective management of environmental issues such as climate change, flood risk and water management. More efficient transport and increased public transport use are also likely to reduce emissions and encourage improvements to air quality.

##### Cumulative

This policy complements policies T9 Funding transport infrastructure through planning and H10 Redeveloping existing housing and Estate Regeneration, which support the delivery of infrastructure and regeneration of housing within the WSE. This policy could conflict with policies SD4 The Central Activities Zone (CAZ) and E11 Sector growth opportunities and spatial clusters which support the intensification of economic growth in the CAZ and growth opportunities and spatial clusters.

##### Recommendations

It was recommended that further information be provided on affordable and adaptable housing, to ensure that a range of housing needs are being considered across the wider region. Details on water scarcity and employment opportunities could also be considered. It was also recommended that further detail is provided on pan regional governance of environmental concerns, for example whether air quality is an issue London and the wider region could manage together.

#### GLA response

Although no changes were proposed to be made to the draft policy, amendments were made to the supporting text to provide additional guidance. With regard to recommendations such as affordable housing, the GLA highlighted that the Mayor is not able to set policy such as this for the WSE but supports the recognition of long-term trends in migration in the development of Local Plans outside London.

The GLA clarified that issues such as water scarcity would be considered as part of SD2 and Part A of the policy recognised the potential economic benefits that investment in strategic infrastructure could bring. Air quality as a regional strategic concern is recognised in SD2.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out below.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Development in the Growth Corridors beyond the identified Opportunity Areas in London itself could potentially affect European sites depending on the quantum and location of growth and how it is designed.

Table 48: SD3 Growth Areas in the Wider South-east and beyond

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	?		+	+	+	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	+	?	+	n/a	+/?
Medium Term						+	?		+	+	+	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	+	?	+	n/a	+/?
Long Term						+	?		++	+	+	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	+	?	+	n/a	+/?
Direct / Indirect						D	I		D	D	D	n/a	n/a	I	n/a	I	n/a	n/a	n/a	D	I	D	n/a	I
Temporary / Permanent						T/P	T/P		P	P	P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	P	T/P	P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	L/GL /W		L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a	L/GL /W	n/a	n/a	n/a	L/GL /W	L/GL /W	L	n/a	L/GL /W
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+	+	+	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+	+	+	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+	+	+	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	n/a	n/a	n/a	n/a	D	D	n/a	D	D	D	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL /W	L/GL /W	n/a	GL /W	GL /W	GL /W	GL /W	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				+	+/?		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	n/a	n/a	n/a		+				n/a	n/a				+	+/?		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	n/a	n/a	n/a		+				n/a	n/a				+	+/?		n/a	n/a		n/a	n/a	n/a		+/?
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				I	I		n/a	n/a		n/a	n/a	n/a		I
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/GL /W				n/a	n/a				L/GL /W	L/GL /W		n/a	n/a		n/a	n/a	n/a		L/GL /W
<b>CSIA</b>																								
Short Term				n/a																				
Medium Term				n/a																				
Long Term				n/a																				
Direct / Indirect				n/a					I															
Temporary / Permanent				n/a					P															
Local / Greater London / Wider Region / Global				n/a					L/GL /W															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.1.4 SD4 The Central Activities Zones (CAZ)

### Policy description

The policy seeks to promote and enhance the Central Activities Zone (CAZ) as an international centre of excellence due to commercial, environmental, and cultural offerings. This includes the provision of both transport and social infrastructure in order to further the security and resilience of the CAZ, as well as to meet the distinct needs of residential communities and ensure there is sufficient industrial capacity to serve the CAZ.

### Initial appraisal and recommendations

The CAZ offers a unique combination of office functions, night-time activities, leisure destinations, international shopping and numerous specialist clusters (such as state, medicine, law and education). This demonstrates the important role the CAZ has in providing capacity for business and delivering a diverse economy. The delivery of digital infrastructure to provide fast, reliable internet, would support increase economic growth and prosperity. The policy also supports local and strategic regeneration and employment opportunities to achieve inclusive growth and tackle inequalities, by identifying Special Policy Areas and Opportunity Areas to increase employment capacity.

This policy facilitates the protection and enhancement of a diverse range of strategic functions located within the CAZ. This includes its functions associated with the State, Government and Monarchy, its cultural, arts, entertainment, night-time economy and tourism functions as well as its nationally and internationally office function. The promotion of inclusive access to green and open spaces, enhancing employment and educational opportunities and securing appropriate social infrastructure to support residential areas are also supported. The delivery of transport infrastructure and promotion of active transport can remove barriers to social and economic opportunities in the city, and encourage physical exercise, supporting a range of health and wellbeing outcomes.

The location of cultural, arts, entertainment, night-time and tourism functions within the CAZ contributes significantly to London's culture and cultural education which can help to facilitate greater social inclusion and fulfilling lifestyles.

By promoting inclusive access to green and open spaces, and encouraging active and sustainable forms of transport this policy would help to mitigate against air pollution, diverse impacts associated with climate change and the heat island effect arising from intensive land use in the CAZ. However, the cumulative effect of the night-time economy and some entertainment functions could increase noise disturbance for residents, workers and users of the CAZ.

### Cumulative

This policy could conflict with policies D13 Noise and S11 Improving air quality which support the increase in air quality and reduction of noise pollution. These policies may be negatively affected due to growth in the CAZ including construction and other industries that have potential to impact the environment. The policy complements policies E11 Sector growth opportunities and spatial clusters, T9

Funding transport infrastructure through planning and D6 Optimising housing density which support the intensification of the central London economy and promote London as an economically competitive city.

### Recommendations

It was recommended that details on accessibility, legibility, safety and security should be considered. It was also recommended that further detail is provided on a definition of inclusive employment opportunities within the CAZ, for example whether job creation associated with the CAZ and other opportunity areas accommodates a range of sector skills and physical needs.

### GLA response

The GLA advised that other policies in the Plan address other issues such as inclusive employment, safety and security, inclusive design. The GLA also advised that the Mayor's Economic Strategy set out more detail in relation sectors and skills.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 49: SD4 The Central Activities Zones (CAZ)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	O	+	O	O	O	n/a	n/a	n/a	O	+	+	n/a	-
Medium Term						+	+		+	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Long Term						+	+		++	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Direct / Indirect						I	I/D		I/D	I/D	I/D	I/D	I/D	I	I	I	n/a	n/a	n/a	I/D	I/D	D	n/a	D
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P	P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	L/ GL		L/ GL	L/ GL	L/GL /W	L/ GL	L/ GL	L	L/ GL	L	n/a	n/a	n/a	L/GL /W	L	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	O	O		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Medium Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Long Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I	I/D		n/a	n/a	n/a	I/D	I/D	n/a	n/a	D
Temporary / Permanent	P	P	P	T/P	T/P	T/P	P/T	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P		n/a	n/a	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L	L/ GL		n/a	n/a	n/a	L/ GL	L	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		?				+	n/a				O	O		n/a	n/a		+	O	n/a		-
Medium Term	+	+	+		?				+	n/a				+	O		n/a	n/a		+	O	n/a		-
Long Term	+	+	+		?				+	n/a				+	O		n/a	n/a		+	O	n/a		-
Temporary / Permanent	I/D	I/D	I/D		D				D	n/a				D	I		n/a	n/a		D	D	n/a		D
Direct / Indirect	P	P	P		P				P	n/a				T/P	T/P		n/a	n/a		T/P	T/P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L/ GL				L/ GL	n/a				L/ GL	L/ GL		n/a	n/a		L/ GL	L	n/a		L
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.1.5 SD5 Offices, other strategic functions and residential development in CAZ

#### Policy description

The policy supports the commercial strategic function of the CAZ through weighting the development of offices and other strategic functions at region-wide and local level against residential development.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The CAZ offers a unique combination of office functions, night-time activities, leisure destinations, international shopping and numerous specialist clusters (such as state, medicine, law and education). This demonstrates the important role the CAZ has in providing capacity for business and delivering a diverse economy. The delivery of mixed-use and mixed-size office space would support a variety of business needs and ensure wider economic growth. Mixed-use office spaces can provide more flexible workspace suitable for different business sizes (micro, small, medium-sized enterprises) and in different industries. This would create further job creation and continue to increase diversity in the economy. It can also help to remove barriers to employment and economic opportunity by encouraging the sharing of office space, lowering initial start-up costs.

This policy ensures that housing developments are not prioritised over the strategic functions of the CAZ. Although this could limit housing growth, this policy does support a balance between housing and office delivery, prioritising office space in this strategic location. This policy also encourages mixed-use developments which include affordable homes. The delivery of affordable homes can support individuals to live and work in the city and access education and services.

##### Cumulative

This policy complements policies E1 Offices, D3 Inclusive design and E4 Land for industry, logistics and services to support London's economic function which support economic growth across various sectors and business sizes. This policy could conflict with policy SI7 Reducing waste and supporting the circular economy by increasing the total number of people within central locations, therefore, increasing pressures on waste authorities and existing infrastructure.

##### Recommendations

It was recommended that the policy provided further details on inclusive access to a range of services and affordable options is particularly important for less mobile and lower income communities.

#### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA also clarified that the policy supports the development of social infrastructure that meets the needs of residents, workers and visitors to the CAZ. The GLA further clarified that the affordable housing policies would also apply to the CAZ as elsewhere.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 50: SD5 Offices, other strategic functions and residential development in CAZ

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	+	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term						+	n/a		n/a	+	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term						+	n/a		n/a	++	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Direct / Indirect						I/D	n/a		n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	O/+	?	?	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	O/+	?	?	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	O/+	?	?	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	I	I	n/a	n/a	I/D	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	L/GL	L/GL	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		O/+				-/?	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		O/+				-/?	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		O/+				-/?	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		I/D				I/D	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				T/P	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/GL				L	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.1.6 SD6 Town centres- strategy

### Policy description

The policy supports the protection and development of London's varied town centres, and seeks to address challenges and opportunities that arise from changes in technology and consumer behaviour. The policy outlines both the potential role of town centres in residential development and intensification of commercial business.

It also seeks to outline the delivery of barrier-free and inclusive town centre environments that meets the needs of all Londoners, including the provision of social infrastructure and improved safety and security.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Town centres promote higher density, mixed-use development to support a range of social, economic and housing needs. Accessible, resilient and diverse town centres can encourage growth in strategic locations to help remove barriers to social and economic opportunities, meet the needs for new housing and improve overall life chances. High quality social infrastructure can encourage active and fulfilling lives, delivering facilities for events and activities in which social networks can form. Supporting infrastructure such as lighting, signage and active frontages are key features which would help to support safe transport and improve perceptions of safety.

Implementation of the policy would support development in town centres and their surroundings. This would benefit a diverse range of economies, including culture, leisure, shopping, night-time, tourism and business. The policy also supports new commercial development and promotes tourist infrastructure, supporting and enhancing London's cultural offerings. Investment in the existing built environment, including heritage assets, would also help to preserve the physical integrity of heritage assets and their town centre settings.

This policy supports the development of high-density, well-connected housing to encourage sustainable travel by walking, cycling and public transport. This can encourage more active, healthier lifestyles and support lower-income or less-mobile groups. More sustainable forms of public transport are also likely to reduce emissions and encourage improvements to air quality and climate change. Measures such as green infrastructure, tree planting and urban greening would offer further environmental benefits and improve London's natural capital and green space network. However, this policy may increase noise disturbance from localised commercial and community activity, which may disproportionately impact more sensitive receptors such as schools, community facilities, care homes and religious institutions.

#### Cumulative

This policy aligns with policies S1 Developing London's social infrastructure, SI6 Digital connectivity and D3 Inclusive design which support the economic and social development of town centres, especially the potential increase of social inclusion and community.

#### Recommendations

It was recommended details on legibility measures, design and social infrastructure were considered. It was also recommended that further detail is provided on education and skills provision, the provision of green space and alleviation of noise disturbance, for example how noise from the night-time economy might be managed.

### GLA response

The final Policy text was updated to include alternative language around inclusive town centre environment. With regard to other recommendations, the GLA advised that other policies within the Plan addressed the issues raised such as employment opportunity, night-time economy, agent of change, noise, social infrastructure, etc.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. It can be considered that at the London Plan level there are no linking impact pathways.

Table 51: SD6 Town centres-strategy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	+	O	n/a	O	n/a	n/a	n/a	O	+	+	n/a	?/-
Medium Term						+	+		+	+	+	n/a	+	+	n/a	+	n/a	n/a	n/a	+	+	+	n/a	?/-
Long Term						+	+		+	++	+	n/a	+	+	n/a	+	n/a	n/a	n/a	+	+	+	n/a	?/-
Direct / Indirect						I	I/D		I/D	I/D	I/D	n/a	I/D	I	n/a	I	n/a	n/a	n/a	I/D	I/D	D	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	T/P	P	n/a	P
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	L/ GL	L/ GL	n/a	L/ GL	L	n/a	L	n/a	n/a	n/a	L/ GL	L/ GL	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	+	+/?	+	+/?	+	+	+	+	?	+	O	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?/-
Medium Term	+	+	+	+	+	+	+/?	+	+	+	+	?	+	+/?	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	?/-
Long Term	++	++	+	+	+	+	+/?	++	+	+	++	?	+	+/?	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	?/-
Direct / Indirect	D	D	D	I/D	D	D	I/D	D	I/D	I/D	D	I/D	I/D	I	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		O				+	n/a				O	n/a		n/a	n/a		O	n/a	n/a		?/-
Medium Term	+	+	+		+				+	n/a				O	n/a		n/a	n/a		+	n/a	n/a		?/-
Long Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?/-
Direct / Indirect	D	D	D		D				D	n/a				I	n/a		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	P	P	P		T/P				P	n/a				T/P	n/a		n/a	n/a		T/P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L	L	L		L				L/ GL	n/a				L	n/a		n/a	n/a		L/ GL	n/a	n/a		L
<b>CSIA</b>																								
Short Term				O					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.1.7 SD7 Town centres- networks

### Policy description

The policy supports the town centre network as a whole. This is in order to achieve sustainable economic growth across Greater London, to enhance the vitality and viability of London's centres, and to ensure these complement those in the Wider South East. It also set outs potential changes to town centre classifications and outlines associated broad policy guidelines, including how boroughs and other stakeholders should have regard to them.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of the policy would have positive effects on maintaining a strong, diverse, and resilient economy. It supports the consolidation of a viable range of functions, particularly retailing, leisure, local employment and workspace, and highlights how boroughs should identify centres for new commercial development. As part of this policy, boroughs are also encouraged to assess the scope for the intensification of land uses, higher density employment space, regeneration opportunities, and encouraging a range of viable functions. These features may help protect existing employment, and ensure resilience in future job opportunities.

This policy supports the development of well-connected town centres to encourage sustainable travel by walking, cycling and public transport. This may promote more active, healthier lifestyles and support lower-income or less-mobile groups. More sustainable forms of public transport are also likely to reduce emissions and encourage improvements to air quality and climate change. However, this policy may increase noise disturbance from localised commercial and community activity, which may disproportionately impact more sensitive receptors such as schools, community facilities, care homes and religious institutions.

#### Cumulative

This policy complements policies E11 Sector growth opportunities and spatial clusters, T1 Strategic approach to transport and T9 Funding transport infrastructure through planning which support the delivery of interconnected town centres and economic growth through various sector opportunities. The policies support of public transport, coupled with policy T1 Strategic approach to transport, may cause positive social inclusion, however, additional use of public transport may impact policy SI1 Improving air quality.

#### Recommendations

It was recommended that further information on appropriate housing, legibility measures, and supporting infrastructure should be considered.

It was also recommended that further detail is provided on how higher density development can be supported, for example through high quality transport infrastructure, access to key social services and open space.

### GLA response

Although no changes were proposed to be made to the draft policy, amendments were made to the supporting text to provide additional guidance and clarity. A reference to social infrastructure was also included. The GLA advised that other policies in the Plan addressed more specifically the other recommendation raised such as housing, social infrastructure, inclusive design, etc.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. It can be considered that at the London Plan level there are no linking impact pathways.

Table 52: SD7 Town centres-networks

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		+	+	+	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	+/?	+	n/a	?/-
Medium Term						+	n/a		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	+/?	+	n/a	?/-
Long Term						+	n/a		+	++	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	+/?	+	n/a	?/-
Direct / Indirect						I	n/a		I/D	I/D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	I	D	n/a	I
Temporary / Permanent						T/P	n/a		T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	T/P	P	n/a	P
Local / Greater London / Wider Region / Global						L	n/a		L/ GL	L/ GL	L/ GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	L/ GL	L	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	?	?	?	n/a	+/?	+/?	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Medium Term	n/a	n/a	n/a	?	?	?	n/a	+/?	+/?	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Long Term	n/a	n/a	n/a	?	?	?	n/a	+/?	+/?	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Direct / Indirect	n/a	n/a	n/a	I	I	I/D	n/a	I	I	I	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	O		O				?	n/a				O	O		n/a	n/a		n/a	n/a	n/a		?/-
Medium Term	n/a	n/a	O		O				?	n/a				O	O		n/a	n/a		n/a	n/a	n/a		?/-
Long Term	n/a	n/a	O		O				?	n/a				+	O		n/a	n/a		n/a	n/a	n/a		?/-
Direct / Indirect	n/a	n/a	I		I				I/D	n/a				I	I		n/a	n/a		n/a	n/a	n/a		I
Temporary / Permanent	n/a	n/a	T/P		T/P				T/P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		L/ GL				L	n/a				L	L		n/a	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/ P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.1.8 SD8 Town Centres - Development principles and local plans

### Policy description

The policy supports a ‘town centres first’ approach in Development Plans and development proposals. This is in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Town centres act as an important centre for local economic growth and provide a range of important social services and facilities. A town centres first approach would help to promote inclusive access to the range of services and social and cultural activities these locations offer. These opportunities encourage social integration, and provide new opportunities to improve life chances and wider wellbeing. The town centres approach would also help to emphasise the role of active frontages, and the night-time economy, which could help to improve perceptions of safety at night-time and contribute to objectives relating to safety and security.

Encouraging boroughs in identifying sites suitable for higher density mixed-use residential intensification would help to optimise housing delivery in an efficient and sustainable way. It would ensure developments are accessible to both public and active transport networks, and supporting social infrastructure. This would help to improve the legibility of town centres, retail and leisure environments. Well-connected developments which encourage sustainable travel by walking, cycling and public transport can also encourage more active, healthier lifestyles and support lower-income or less-mobile groups.

This support for high density, well-connected town centres encourages more sustainable forms of public transport which is likely to reduce emissions and encourage improvements to air quality and climate change mitigation and adaptation. The need the layout of land uses in town centre developments could also improve the local environment by mitigating against issues such as noise exposure through careful design and management

#### Cumulative

This policy aligns with policies E10 Retailing and D2 Delivering good design which support local social integration through multipurpose town centres. Additionally, policies S11 Improving air quality and T2 Healthy streets align with this policy as active transport is encouraged, which will potentially reduce use of private vehicles.

#### Recommendations

It was recommended that further information be provided on the supporting infrastructure that could be developed to support a town centre approach. Details on the provision of green space, cultural participation to support vibrant town centres, and affordability should be considered. It was also recommended that further detail is provided on how employment in declining retail sectors could be managed, particularly in out-of-centre locations, for example this could include opportunities to re-train staff, and the provision of affordable business units as part of new developments.

### GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance. The GLA advised that issues such as affordable workspace, social infrastructure, culture, green space provision and active travel were addressed more specifically elsewhere in the Plan. Detailed information for specific town centres should be provided by boroughs through local plans.

The GLA further advised that skills and training were more appropriately addressed in the Mayor’s Economic Strategy.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy also positively promotes redevelopments should encourage and ensure more sustainable transport by public transport, cycling and walking which will positively affect air quality levels. It can be considered that at the London Plan level there are no linking impact pathways.

Table 53: SD8 Town centre development principles and local plans

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+/?		+	n/a	+	n/a	+	O	n/a	O	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+/?		+	n/a	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+/?		+	n/a	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		I/D	n/a	I/D	n/a	I	I	n/a	I	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	n/a	L/ GL	n/a	L	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	?	?	+/?	+/?	+/?	+	+	+	+	n/a	?	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	?	?	+/?	+/?	+/?	+	+	+	+	n/a	?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	++	++	?	?	+/?	+/?	+/?	+	+	+	+	n/a	?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I	I	I/D	I/D	I/D	I/D	I/D	I/D	I/D	n/a	I/D	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	T/P	T/P	P	P	P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L	L/ GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		O				+	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		O
Medium Term	+	+	+		O				+	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		O
Long Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	n/a				D	n/a		n/a	n/a		n/a	n/a	n/a		I
Temporary / Permanent	P	P	P		P				P	n/a				T/ P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L				L/ GL	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.1.9 SD9 Town centres local partnership and implementation

### Policy description

The policy aims to develop strong, resilient and adaptable town centres through place-specific town-centre strategies which ensure that the local community continues to be well served and that the network of town centres across London continues to function.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy supports a community and partnership-led approach to developing and managing town centres. It identifies the importance social benefits town centres offer, acting as a key location for social activity and integration, particularly for more vulnerable people. Social interaction plays a pivotal role in individual health and wellbeing and this policy ensures town centres continue to provide access to the most important social facilities and services.

A partnership-led approach to developing resilient and adaptable town centres also supports the delivery of housing, and associated supporting infrastructure. This includes supporting boroughs to consider a range of mechanisms to deliver housing intensification and mixed-use development, as well as local authorities exploring regeneration, growth and intensification opportunities. Emphasis on community consultation, a tailored approach to development, and preserving local services of amenity value is likely to encourage the appropriate provision, capacity and quality of infrastructure needed to underpin residential and commercial growth. This interaction with the community may also facilitate a sense of ownership by allowing local residents to influence their locality to suit their needs and expectations.

#### Cumulative

This policy complements policies T3 Transport capacity, connectivity and safeguarding and S1 Developing London's social infrastructure which support the connectivity between town centres and the improvements to social infrastructure. This policy may conflict with SD4 The Central Activities Zone (CAZ) as newly developed economic growth in local areas may compete with existing locations and cause negative effects to existing employees and businesses.

#### Recommendations

It was recommended that further information be provided on how Town Centre Strategies could support and develop cultural infrastructure, and appropriate access to such opportunities. It was also recommended that further detail is provided in relation to housing development, for example the policy could make reference to affordable, adaptable and accessible provision.

### GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance and clarity. The GLA advised that further information is provided in other policies within the Plan which address cultural uses and housing, and that it is more appropriate for further information for specific town centres to be provided by boroughs through local plans.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways.

Table 54: SD9 Town centres local partnership and implementation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	n/a		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	+/?	+	?	n/a	n/a	n/a	+	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	+/?	+	?	n/a	n/a	n/a	+	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	+/?	+	?	n/a	n/a	n/a	+	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	n/a	n/a	I/D	I/D	I/D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a
Temporary / Permanent	P	P	n/a	n/a	T/P	T/P	P	n/a	n/a	n/a	P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	n/a	n/a	L/ GL	L/ GL	L	n/a	n/a	n/a	L/ GL	n/a	L	n/a	n/a		n/a	n/a	n/a	n/a	L	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/ GL					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.1.10 SD10 Strategic and local regeneration

### Policy description

The policy supports regeneration based on local community knowledge and an understanding of the particular needs of the area. It also outlines how Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy facilitates the protection and enhancement of community facilities and social infrastructure through local plans which target specific spatial issues and inequalities. Community facilities and services provide centres for social integration and interaction, which can contribute significantly to health and wellbeing. This policy also recognises the role cultural facilities, employment and education can have in the development of social networks. This spatially-target approach would therefore particularly benefit those areas more deprived of these opportunities and facilities, addressing barriers and enabling individuals to live more active, fulfilling lives. By acknowledging and using the knowledge of the local community, this policy may also encourage a greater sense of ownership in local areas by allowing individuals to influence the development of their locality, whilst benefiting the local authority and developers who can target specific problems and needs.

By setting out integrated spatial policies to target localised issues, issues relating to housing and housing provision can be managed. Identifying areas with high levels of homelessness, overcrowding or low housing affordability would enable local authorities to concentrate on the needs of the community and address these specific, more localised issues. Similarly, transport and accessibility inequalities can be addressed, removing actual and perceived barriers to the wider social and economic opportunities London has to offer. The policy also supports local and strategic regeneration which may help to achieve inclusive growth and tackle wider inequalities.

Local and strategic regeneration, through integrated spatial policies, may facilitate improvements to environmental factors in the local community. Issues such as poor air quality and a lack of green and open space are often prevalent in more deprived areas, but this approach to local regeneration can help reduce these inequalities by targeting these deprived areas more directly.

#### Cumulative

This policy may conflict with policies H1 Increasing housing supply, E4 Land for industry, logistics and services to support London's economic function and H5 Delivering affordable housing which support new developments and spatial land take. This policy complements policies H11 Ensuring the best use of stock, H10 Redeveloping existing housing and Estate regeneration and G1 Green infrastructure which support the protection of land and increased efficiency of space through mixed use developments.

#### Recommendations

It was recommended that further information be provided on support for local and independent businesses, as well as affordable housing. Details on how these businesses are encouraged alongside higher value industries and the aspects of employment, such as types of job, should be considered.

It was also recommended that further detail is provided on how environmental, economic and social barriers could be overcome, for example how provision of green spaces, access to the open space network, safety, and inclusive leisure opportunities may be achieved.

### GLA response

The GLA advised that other policies such as low cost and affordable workspace, community safety, design, affordable housing, social infrastructure, etc. addressed these issues more specifically. Policy CC3 specifically requires an integrated approach to managing health issues.

The GLA further advised that the Mayor's Economic Strategy more appropriately addressed issues such as types of jobs.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways.

Table 55: SD10 Strategic and local regeneration

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Medium Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Long Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Temporary / Permanent						I	n/a		I/D	I/D	I/D	I/D	D	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D	D	n/a	n/a
Direct / Indirect						T/P	n/a		T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	?	?	+/?	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Medium Term	+	+	+	?	?	+	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Long Term	++	++	++	?	?	+	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Temporary / Permanent	D	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	I/D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a		n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Medium Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Long Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Temporary / Permanent	D	D	D		I				n/a	n/a				I	n/a		n/a	n/a		I	I	n/a		n/a
Direct / Indirect	T/P	T/P	T/P		P				n/a	n/a				P	n/a		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				L/ GL	n/a		n/a	n/a		L/ GL	L/ GL	n/a		n/a
<b>CSIA</b>																								
Short Term				?							?													
Medium Term				?							?													
Long Term				?							?													
Temporary / Permanent				I/D							I/D													
Direct / Indirect				T/ P							T/ P													
Local / Greater London / Wider Region / Global				L							L													

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2 Design

### 9.2.1 D1 London's form and characteristics

#### Policy description

The policy supports developments that enhance the public realm by providing secure environments, access to green and open spaces, and promoting active travel. The design of the buildings should complement the existing streetscape and surrounding area and create a comfortable pedestrian environment. This policy seeks to minimise the impacts of noise and on air quality by ensuring developments are designed to allow deliveries outside peak house. It also supports the adoption of the circular economy principles when designing new developments, to minimise the use of new materials. This is particularly important for large scale developments where opportunities for innovative design that avoids waste and supports high recycling rates can be achieved.

#### Initial appraisal and recommendations

The implementation of this policy would result in a range of positive effects across social objectives. The promotion of active travel and Healthy Streets would facilitate increased levels of physical exercise, and the protection of green spaces can provide areas for relaxation, mindfulness, community events and exercise. High quality public realm, which is safe and inclusive, can help reduce isolation and exclusion, particularly among more vulnerable groups. This can contribute to improving quality of life for residents and support vulnerable groups in accessing the range of opportunities London offers.

This policy would benefit London's cultural assets through enhancement of the public realm and open spaces and delivery of new high quality, well designed developments which generate liveliness and interest in local areas. This could facilitate growth in the cultural sector by providing space and support for events and facilities, and the delivery of an inclusive environment would improve wider participation and access to these cultural activities. Inclusive design and developments which respect the local environment would also ensure this policy positively effects historic environment objectives by improving wider access and supporting the protection and enhancement of historic assets.

This policy supports the delivery of infrastructure which meets the needs of Londoners. It ensures new developments use land efficiently and facilitates the delivery of supporting infrastructure. The policy requires public spaces to be accessible and inclusive, and encourages vibrancy, seeking to deliver walkable spaces which respect and enhance the existing locality. It also supports legible spaces, which can play a key role in overcoming severance, particularly for vulnerable groups, such as those with disabilities or those who face language barriers. The policy is also likely to improve social cohesion, health inequalities and ensure equity of access to wider range of opportunities.

This policy places emphasis on the protection and enhancement of green and open spaces which create spaces for natural and semi-natural habitats which would facilitate improvements to the ecological function of green corridors, and green and blue spaces. This would ensure the protection of the species and habitats within these green and blue networks and increase wider access to biodiversity across the city.

The implementation of this policy would benefit air quality and could have positive outcomes with respect to mitigating climate change, by promoting active travel, which can reduce private vehicle use, and protection and enhancing green space, which can act as an important carbon sink for emissions. The promotion of circular economy principles would also reduce waste and material consumption, contributing to reduced vehicle use and the protection of important natural resources. However, changes to air quality and climate change impacts are likely to be seen in longer-term. The reduction in private

vehicle use, protection of green and open spaces and implementation of high quality design supported by this policy would also contribute to reducing noise levels for local residents and improve access to quiet, tranquil spaces.

#### Cumulative

This policy complements policies HC1 Heritage conservation and growth, G1Green infrastructure and G5 Urban greening which support the protection of accessible environments and social wellbeing through the provision of green space and active transport opportunities.

#### Recommendations

Further information on the interconnectivity between communities, amenities, transport and open spaces, such as active transport networks, was recommended. It was also recommended that further detail be provided on methods to design out crime and to promote sustainable construction methods for new developments.

It was recommended that the policy supports green infrastructure to increase the provision of natural capital in the most built up areas. It was also recommended the policy outlines the need for the layout of new development to contribute to improving air quality, for example through the use of green technologies. It was recommended the policy should not just consider materials used for the new developments, but also address waste management.

#### GLA response

No significant changes were proposed to be made to the draft policy. The policy was reordered to improve clarity and additions to the supporting text were added, addressing active travel routes, connectivity and the wider benefits of good design. A reference was made to sustainable standards in the policy.

Many of the recommendations made are covered by other policies within the Plan, particularly Chapter 9 Sustainable infrastructure, for example SI4 Reducing Waste, and in Chapter 8 Green infrastructure which refer to the use of green technologies and green infrastructure. Other policies in this chapter cover issues such as designing out crime.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy contains positive provision to help mitigate impacts of poor air quality. Whilst it is noted that this is from a human health point of view any design feature that has potential to help reduce atmospheric pollution contributions can be considered to be a positive policy. This policy also provides for public space, landscape and visual interest has potential to divert recreational pressure away from European designated sites.

Table 56: D1 London's form and characteristics

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		?	+	+	n/a	+	O	O	O	O	n/a	n/a	+	+	+	+	+
Medium Term						+	++		?	+	+	n/a	+	O	O	O	O	n/a	n/a	+	+	+	+	+
Long Term						+	++		?	+	+	n/a	+	+	+	+	+	n/a	n/a	++	+	+	+	+
Direct / Indirect						D	D		I	D	D	n/a	D	I	I	I	I	n/a	n/a	D	D	D	D	D
Temporary / Permanent						P	P		T/P	P	P	n/a	P	P	P	P	P	n/a	n/a	P	P	P	P	P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	L/GL	L/GL	n/a	L	L/GL/W	L/GL/W	L/GL	L/GL	n/a	n/a	L/GL/W	L	L	L/GL/W	L
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	O	+	O	+	n/a	O	n/a	+	O	n/a		n/a	n/a	n/a	+	+	n/a	n/a	+
Medium Term	+	+	+	+	n/a	O	++	+	+	n/a	+	n/a	+	O	n/a		n/a	n/a	n/a	+	+	n/a	n/a	+
Long Term	++	++	+	+	n/a	+	++	+	+	n/a	+	n/a	+	+	n/a		n/a	n/a	n/a	++	+	n/a	n/a	+
Direct / Indirect	D	D	D	D	n/a	I	D	D	D	n/a	D	n/a	I	I	n/a		n/a	n/a	n/a	D	I	n/a	n/a	I
Temporary / Permanent	P	P	P	P	n/a	P	P	P	P	n/a	P	n/a	P	T/P	n/a		n/a	n/a	n/a	P	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	L	L/GL/W	n/a		n/a	n/a	n/a	L/GL/W	L	n/a	n/a	L/GL/W
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				O	O		n/a	n/a		+	+	n/a		+
Medium Term	+	+	+		n/a				n/a	n/a				O	+		n/a	n/a		+	+	n/a		+
Long Term	++	++	+		n/a				n/a	n/a				+	+		n/a	n/a		++	+	n/a		+
Direct / Indirect	D	D	D		n/a				n/a	n/a				I	I		n/a	n/a		D	I	n/a		D
Temporary / Permanent	P	P	P		n/a				n/a	n/a				P	P		n/a	n/a		P	P	n/a		P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				n/a	n/a				L/GL/W	L/GL		n/a	n/a		L/GL/W	L	n/a		L
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				P					n/a															
Local / Greater London / Wider Region / Global				L/GL					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.2 D2 Delivering good design

### Policy description

The policy supports the delivery of good design through the recommendation of processes and actions for the design analysis and visualisation, design quality and development certainty, design scrutiny and maintenance emerging designs.

It also aims to understand the capacity for growth of an area to inform sustainable options for growth and to identify the most appropriate form of development for the area. The evaluation of the area includes the description of the current social, cultural, physical and environmental features and potential opportunities for the future.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would result in positive effects on social objectives as it strongly supports the appropriate design of buildings which provide sufficient open space and amenities that meet the needs of local residents. This policy ensures the design of developments is fully informed by evidence-based studies. This would facilitate the delivery of context-specific developments which encourage equality and social integration. Awareness and sensitivity can help ensure new developments manage health issues and health inequalities.

Through the use of important socio-economic data, this policy could benefit housing objectives. Data can identify issues such as homelessness, fuel poverty and overcrowding, which can be improved through the implementation of high quality, well designed housing.

The implementation of this policy would support sustainable land use, design and infrastructure objectives. It ensures that socio-economic data is used to inform design and ensure developments meet the needs of the local areas.

This policy's support for high-quality appropriate design, informed by a review of evidence, is likely to help improve accessibility and connectivity to key infrastructure and services. These review would assess movement and transport networks, public transport accessibility and active transport networks to inform design outcomes, helping to support more vulnerable, less mobile groups.

This policy could also benefit education and employment objectives through consideration of socio-economic data which can inform developers of issues such as employment rates, income, school capacity or qualification attainment. This again would help inform design decisions and understand the local capacity of key services. Similarly energy and waste objectives may benefit from the attainment of reliable data to identify where supporting infrastructure may be needed in response to the delivery of new developments.

Implementation of this policy is likely to result in a range of environmental effects. The consideration of air quality and noise data would ensure this policy positively impacts on these related objectives. The identification of areas experiencing particularly poor air quality and excess noise, which are often more prevalent in deprived areas, can help ensure new developments are able to respond positively to addressing these issues, providing wider health benefits and reducing health inequalities through high quality design in areas where it is most needed. Moreover, reliable data could be used to also encourage further protection and enhancement of natural capital. For example, assessing access to nature would identify deficiencies which could be improved through design.

### Cumulative

This policy complements policies G5 Urban greening, HC4 London view management framework and local views, SI1 Improving air quality and E5 Strategic Industrial Locations (SIL) which support the quality provision of sustainable growth across a variety of sectors.

### Recommendations

This policy suggests a variety of data and evidence which can be used to inform design. However, it was recommended that crime statistics were also considered, particularly as the practice of 'designing out crime' can help improve the public realm and wellbeing of residents.

Further details on how the data could be used was recommended. Examples of this included focusing on the provision of office or retail space in areas of high unemployment, highlighting areas with high levels of housing deprivation, controlling development in areas of poor air quality, putting appropriate restrictions in place to manage noise levels. Additional evidence and data could be collated on the existing location, access routes and capacity of surrounding infrastructure.

Despite this policy focusing on the delivery of good design, there was little reference to sustainable design, for example using green infrastructure, renewable energy or innovative waste management.

### GLA response

No significant changes were made to the policy however a reference to also consider crime statistics was added. Many of the recommendations made are covered by other policies, including transport, air quality, sustainable design and economic policies, which addresses these issues more specifically.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy as it outlines the requirement for new development to consider public transport accessibility and movement and transport networks and air quality which has potential to reduce atmospheric pollution. Open space, green infrastructure and water bodies also require consideration. Consideration of these types of provision has potential to divert recreational pressure away from sensitive wildlife sites.

Table 57: D2 Delivering good design

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Medium Term						+	+		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Long Term						+	+		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Direct / Indirect						I	D		D	D	D	I	I	I	n/a	I	I	n/a	n/a	D	D	n/a	I	I
Temporary / Permanent						P	P		P	P	P	P	P	P	n/a	P	T	n/a	n/a	P	P	n/a	P	P
Local / Greater London / Wider Region / Global						L	L		L	L	L	L	L	L	n/a	L	L	n/a	n/a	L/ GL	L/ GL	n/a	L	L
<b>EQIA</b>																								
Short Term	+	+	+	n/a	?	+	+	O	O	n/a	?	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Medium Term	+	+	+	n/a	?	+	+	+	+	n/a	+	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Long Term	+	+	+	n/a	?	+	+	+	+	n/a	+	?	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	I	I	I	n/a	I	I	I/D	I/D	I/D	n/a	I/D	I/D	n/a	I	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	P	P	P	P	n/a	P	P	n/a	P	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	n/a	L	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Long Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	n/a				I	n/a		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	T	T	T		P				P	n/a				P	n/a		n/a	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		n/a	n/a		L/ GL	n/a	n/a		L
<b>CSIA</b>																								
Short Term				O					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					D															
Temporary / Permanent				P					P															
Local / Greater London / Wider Region / Global				L/ GL					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.2.3 D3 Inclusive design

#### Policy description

This policy supports the delivery of an inclusive environment meeting the needs of all Londoners. The built environment should be safe, accessible and convenient. An inclusive design would improve the quality of life of all Londoners, and especially disabled and older people.

It also supports the preparation of an inclusive design statement as part of the Design and Access Statement. The Design and Access Statement should define the design concept, present the potential impacts on people and communities, highlight the historical context, describe the maintenance and management of inclusion, detail user engagement and ensure accordance of the design with best practice standards and design guidance.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would result in positive effects across a number of social, economic and environmental objectives as it strongly supports accessible and inclusive design to ensure that all communities can safely, easily and independently access opportunities, jobs and services.

The policy explicitly makes reference to the provision of design which provides dignity for all and areas that are convenient and welcoming with no disabling barriers, providing independent access. This is particularly important for lesser mobile communities, including those with a disability or existing health condition, along with buggy users.

The fear of crime can disproportionately affect vulnerable groups, so the implementation of a robust inclusive design policy is integral in reducing this fear and its associated effects, contributing positively to objectives relating to safety and security. This is particularly important in providing opportunities for higher risk groups, including women, LGBTQ and BAME communities, and could help to promote a culture of equality.

This inclusive design policy would also benefit the accessibility and the connectivity objectives as it is expected to increase the access to services and facilities, and the connectivity across London. Accessibility is particularly important in overcoming barriers for groups with lower-mobility. This is likely to help reduce social exclusion and severance, as well as discouraging discriminatory practices more broadly. Providing safe and inclusive environments will also help to improve accessibility and opportunities for vulnerable groups. Improved access to services, open spaces and active travel opportunities could help to improve the health and well-being of communities.

Implementation of the policy is likely to have positive economic benefits as it will contribute to helping to reduce barriers to employment.

Depending on how inclusive design is delivered and maintained, the policy could help to contribute to positive feelings about the local environment, particularly where design is welcoming.

Although not explicitly mentioned in the policy, inclusive design could include good quality green spaces that are accessible to all and that could encourage more exercise and play, which is likely to result in benefits to both mental and physical health and wellbeing in surrounding areas. These inclusive areas could provide tranquil and quiet spaces, diversifying the offer of London's green network.

The policy would have positive effects on the infrastructure objective as it is expected it would support an integrated approach for the inclusive design of all new developments.

Through increased accessibility and inclusivity, the policy would also support cultural activities as it could increase access to social and cultural infrastructure and increase participation among less mobile or disadvantaged groups.

##### Cumulative

This policy aligns with policies HC1 Heritage conservation and growth, G4 Local green and open space and H12 Housing type mix which support the provision and protection of green spaces and heritage sites, whilst promoting sustainable growth of housing developments. The combined effects of the policies could cause positive economic growth through the provision of sustainable housing design with integrated green spaces.

##### Recommendations

It was recommended that further information could be provided on the legibility of the built environment, to help accommodate a range of invisible disabilities, including cognitive and sensory impairments. Reference to access and links to and in-between key services and transport infrastructure should be provided.

Affordable transport options and opportunities for lower-income communities should be added to the policy. It was also recommended that further guidance be provided on measures to design out crime and improve safety for lesser mobile and higher risk communities.

##### GLA response

No major changes were proposed to be made to the draft policy. However, the GLA amended the supporting text to include the words legible and navigable and further guidance in relation to transport infrastructure. A reference to the consideration of links into neighbourhoods was included.

The GLA advised that it was more appropriate to move the emergency evacuation of disabled people information to the fire safety policy.

In relation to crime and safety it is considered that these elements are addressed by other policies within the London Plan.

##### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

##### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 58: D3 Inclusive design

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Direct / Indirect						n/a	I		n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						n/a	P		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L		n/a	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Medium Term	++	++	+	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Long Term	++	++	+	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Direct / Indirect	D	D	I	I	n/a	n/a	D	D	D	D	D	n/a	D	n/a	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent	P	P	P	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.2.4 D4 Housing quality and standards

### Policy description

This policy supports innovative and high quality housing design. This would be achieved by supporting the provision of housing with adequate sized rooms and a functional layout. New housing developments should be sustainable and built to meet standards relating to sunlight, storage space, bedspace, headroom and floor area. It also supports the provision of private outdoor space, including gardens and balconies, and seeks to minimise the development of single aspect dwellings.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would result in positive effects on social objectives as it supports the provision of housing across all typologies, including accommodating the needs of older people, children and disabled residents. This could help towards reducing exclusion and promoting an inclusive environment for residents. This would also have very positive effects on health and housing objectives. New housing must conform to building control standards, in addition to the standards set out in this policy, which would help to reduce issues such as homelessness, overcrowding and the risk of ill-health from damp or mould. This policy would also indirectly benefit economic objectives through the provision of sufficient, high quality housing which attracts workers and ensures individuals can both live and work in London.

This policy strongly emphasises the importance of design, including the provision of amenity areas, active frontages and footpaths and links between spaces. Although not explicitly outlined, by encouraging good housing design this policy could contribute to designing out crime, improving safety and the perception of safety in the local area. This policy emphasises the relationship between new residential areas and surrounding developments, including supporting connectivity between spaces and the provision of footpaths, supporting accessibility and connectivity objectives.

This policy would support infrastructure objectives, ensuring the provision of new homes which meet high standards. The standards set out in this policy would also benefit climate change objectives as it considers the need to ensure housing is well ventilated and spacious to address the impact of the heat island effect of London. This would also have important health benefits, especially for more vulnerable groups such as the elderly.

This policy would result in positive effects on environmental objectives. Natural capital and natural environment objectives would benefit through the provision of open space and private outdoor space. This would help protect and enhance local habitats and bring natural elements to the most built up parts of London. The policy supports high quality residential development, with appropriate space standards and layout of rooms. These features would help to mitigate adverse impacts associated with noise.

#### Cumulative

This policy complements policies H14 Supported and specialised accommodation and G4 Local green and open space which support equality and environmental objectives. Additionally, this policy combined with H14 Supported and specialised accommodation may promote inclusive communities with the provision of amenity areas.

### Recommendations

It was recommended that further detail be provided on design interventions that could create safer spaces. It was also recommended that further detail be provided on public transport accessibility and opportunities, underpinning high density development.

Reference to inclusive, accessible and safe spaces that accommodate a range of cognitive and sensory needs was recommended. It was also recommended that waste management and circular economy practices be promoted in the development of new housing.

### GLA response

The majority of the policy text did not change significantly, however further details were added referencing a sense of safety and the promoting of recycling practice, noise impacts and coherent layouts

Many of the other recommendations are covered by other aspects of the Plan, particularly density, inclusive design and transport policies.

### Appraisal of finalised policy

The finalised policy additionally refers to developments ensuring a sense of safety, resulting in positive effects for crime and safety objectives. Additional text was added referencing the provision of recycling storage and therefore waste management objectives have been made positive.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy provides positive provision for an amount of outdoor space per new dwelling. This has the potential to divert recreational pressure away from European designated sites sensitive to increased recreational pressure.

Table 59: D4 Housing quality and standards

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		n/a	?/+	+	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Medium Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Long Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Direct / Indirect						I	I/D		n/a	I	D	n/a	n/a	n/a	n/a	n/a	I/D	n/a	I/D	D	n/a	I	I/D	I/D
Temporary / Permanent						T/P	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	P	n/a	P	T/P	P
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	L	n/a	L	L	n/a	L	L	L
<b>EQIA</b>																								
Short Term	+	+	+	+	+	?	O	O	O	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Medium Term	+	+	+	+	+	?	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Long Term	+	+	+	+	+	+	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	I	I	I	D	D	I	I/D	I/D	I/D	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Long Term	+	+	++		++				n/a	n/a				n/a	++		?	n/a		+	n/a	n/a		+
Direct / Indirect	I	I	D		I				n/a	n/a				n/a	I/D		I/D	n/a		D	n/a	n/a		I/D
Temporary / Permanent	T/P	T/P	I		T				n/a	n/a				n/a	T/P		T/P	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/GL	L/GL	T/P		L				n/a	n/a				n/a	L		L	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.5 D5 Accessible housing

### Policy description

The policy supports the provision of suitable housing, and genuine choice, to accommodate London's diverse population. This includes lesser mobile residents, older people, and families with young children.

Specifically, the policy intends to ensure that 10% all of new residential developments will be designed for wheelchair users, and the remainder meet the standards of the Building Regulations that define accessible and inclusive housing.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy will ensure appropriate design measures and inclusive access to allow all Londoners to live in a dignified and independent manner.

The policy supports the provision of accessible and adaptable dwellings, which will help in ensuring that all Londoners are able to live in appropriate accommodation. This is particularly important in meeting the needs of lesser mobile communities, older people, and residents with a disability or existing health condition, including cognitive and sensory impairments. This could play an important role in overcoming discriminatory practices, and encouraging equal opportunities for all residents.

The ability to move and live comfortably is likely to play a role in expanding opportunities for all communities, and improving overall health and wellbeing, and likelihood of participating in city life. This would have tangible benefits for many demographic groups, particularly older people and those with young children. Appropriately designed housing could improve the safety and security of residents, and encourage greater community integration and access to services.

#### Cumulative

This policy aligns with policies S2 Health and social care facilities, G4 Local green and open space and HC1 Heritage conservation and growth which support local amenities to all Londoner's which could create a more inclusive society and reduced level of poverty.

#### Recommendations

It was recommended that the definition of inclusive access could be expanded to include legibility of the development and surrounding area. This is particularly important in assisting residents with 'invisible' disabilities, such as those with cognitive or sensory impairments, in manoeuvring the built environment. Further detail could also be provided on how existing dwellings can be retrofitted to meet this policy criteria, including reference to supporting transport links and access to services.

### GLA response

The GLA advised other policies within the Plan such as Inclusive Design and Public Realm addressed issues of legibility and other inclusive / accessibility recommendations. In addition, the GLA clarified that DCLG Housing Standards Review does not allow for standards other than those contained in the optional building regulations.

The GLA also advised that this policy was only applicable to new development or where there is an application for redevelopment, therefore retrofitting of existing development was not appropriate.

No major changes were made to the draft policy, although minor wording amendments were made to the supporting text to provide further clarity.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 60: D5 Accessible Housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	O	n/a	?	n/a	n/a	n/a	n/a	O	n/a	+
Medium Term						?	n/n		n/n	n/n	+	n/n	n/n	n/n	+	n/n	?	n/n	n/n	n/n	n/n	O	n/n	+
Long Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	+	n/a	?	n/a	n/a	n/a	n/a	O	n/a	+
Direct / Indirect						I	n/a		n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	I	n/a	I
Temporary / Permanent						T/P	n/a		n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	n/a	L/GL	n/a	n/a	n/a	L/GL /W	n/a	L	n/a	n/a	n/a	n/a	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	?	?	+	?	?	?	?	n/a	?	n/a	n/a	n/a	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	?	?	+	?	+	+	+	n/n	+	n/n	n/n	n/n	+		n/n	n/n	n/n	n/n	n/n	n/n	n/n	n/n
Long Term	+	+	+	+	+	?	+	+	+	n/a	+	n/a	n/a	n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I	I	D	I	I	I/D	I/D	n/a	I/D	n/a	n/a	n/a	I		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a	n/a	L/GL /W		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+					n/a	n/a				n/a	O		?	n/a		n/a	n/a	n/a	+
Medium Term	n/n	n/n	+		+					n/n	n/n				n/n	+		?	n/n		n/n	n/n	n/n	+
Long Term	n/a	n/a	+		+					n/a	n/a				n/a	+		?	n/a		n/a	n/a	n/a	+
Direct / Indirect	n/a	n/a	I		D					n/a	n/a				n/a	I		I	n/a		n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	T		P					n/a	n/a				n/a	T/P		T/P	n/a		n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		L/GL					n/a	n/a				n/a	L/GL /W		L	n/a		n/a	n/a	n/a	L
<b>CSIA</b>																								
Short Term				+						n/a														
Medium Term				+						n/n														
Long Term				+						n/a														
Direct / Indirect				D						n/a														
Temporary / Permanent				T						n/a														
Local / Greater London / Wider Region / Global				L/GL						n/a														

- Objectives**
1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  4. To contribute to safety and security and the perceptions of safety
  5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  8. To maximise accessibility for all in and around London
  9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  22. To conserve London's geodiversity and protect soils from development and over intensive use.
  23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.6 D6 Optimising housing density

### Policy description

This policy supports development proposals that make the most efficient use of the land and be developed at optimum density. Consideration should be given to the site context, its connectivity and accessibility and the capacity of the surrounding infrastructure.

It also aims to identify existing and future infrastructure (physical, environmental, social) to support new developments. Measures of density should be provided in development proposals; the higher the density of a development the greater the level of scrutiny that is required of its design and proposed ongoing management.

### Initial appraisal and recommendations

#### Social, economic and environmental impacts

The implementation of this policy would have significant benefits in meeting London's housing needs, by encouraging a more efficient use of land resources. It would support the provision of high quality and high density residential development to help accommodate growth needs across the city, helping to reduce homelessness and overcrowding. The provision of higher density housing can support wider economic growth objectives, through helping to ensure London's housing needs are met and a more diverse range of workers can access housing options. This will contribute to ensuring that London remains an attractive place in which to live and work.

This policy also encourages the provision of associated infrastructure, including open space and public realm, which in turn is likely to encourage a number of favourable health outcomes. This policy would also improve physical health by supporting active travel.

It is expected that the policy would have positive impacts on sustainable land-use, by helping to ensure that high densities do not result in adverse impacts for different groups of people. The policy also supports the provision of appropriate open spaces, communal areas, transport and infrastructure capacity, which suggests that in the long term, positive effects for this objective would occur.

By supporting high quality design which include shared open spaces, public realm and active transport infrastructure, this policy would have positive effects on the design objective. It also considers inclusive design, looking at the needs of a variety of groups to ensure housing provision supports them.

One of the improvements to the existing infrastructure proposed by the policy is to support future densities through encouraging active travel. This could create a shift to more sustainable forms of travels, therefore reducing traffic volumes. The policy would be beneficial to both the connectivity and the infrastructure objectives. Also, by encouraging active travel and increasing the access to a range of public transport options, the policy would result in positive effects on air quality and climate change mitigation through reduced emissions.

The policy supports the provision of high quality public realm and amenity space for new housing, which offers an opportunity to bring nature closer to people and protect relevant habitats. The policy would be beneficial to the natural environment. However, the policy suggest benefits would only apply to new development; it would have neutral or no effects on the natural environment of existing development as deficiencies would not be addressed.

### Cumulative

This policy could conflict with policies H17 Purpose built student accommodation, H18 Large scale purpose built shared living and E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function which support growth of industries through land take. This policy complements policies G2 London's Green Belt, G6 Biodiversity and access to nature and G7 Trees and woodland which support the efficient use of space for environmental gain. The combined effects of the policies could cause positive economic growth via cost effective developments, such as high rise flats.

### Recommendations

It was recommended that further information be provided on high density residential development across a range of housing typologies, including affordable options.

Further reference to the role of brownfield sites, and regenerative opportunities that could benefit the wider area and disadvantaged communities should be presented.

It was also recommended that further detail be provided on transport and accessibility opportunities from new high density developments. Inclusive and affordable transport options should underpin high density development. This policy should also be more specific measures that will be taken to maximise active travel.

### GLA response

No changes were proposed to be made to the draft policy, although minor amendments to the text were made to provide better clarity.

The GLA clarified that nearly all of London's development is on brownfield sites, therefore the policy did not have to reference this. Chapter 1 also sets out the regeneration benefits of making the best use of land.

The GLA clarified that appropriate housing typologies would come out of the design process. They also advised that more detail on public transport accessibility, healthy streets and active travel were set out in the transport chapter. Some of GLA's responses included a reference to other policies for further details, policies that are more specific to the recommendations.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy provides positive provision that has the potential to reduce atmospheric pollution via the need for connectivity and accessibility to public transport, thus reducing the need for travel by car.

Table 61: D6 Optimising Housing Density

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		O	+	+	n/a	n/a	O	n/a	O	O	n/a	n/a	+	n/a	O	n/a	?/-
Medium Term						+	+		+	+	++	n/a	n/a	+	n/a	+	+	n/a	n/a	+	n/a	O	n/a	?/-
Long Term						+	+		+	+	++	n/a	n/a	+	n/a	+	+	n/a	n/a	+	n/a	O	n/a	?/-
Direct / Indirect						I	D		I/D	n/a	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	D	n/a	I	n/a	D
Temporary / Permanent						T/P	T		T/P	n/a	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	P	n/a	P	n/a	P
Local / Greater London / Wider Region / Global						L/GL	L		L/GL	n/a	L/GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	L	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	O	+	+	?/+	O	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	+	+	?/+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	+	+	?/+	+	n/a	++	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	I/D	I/D	D	I/D	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	T/P	P	T/P	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	L/GL	L/GL	L	L/GL	n/a	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				O	n/a				O	n/a		n/a	n/a		O	n/a	n/a		?/-
Medium Term	n/a	n/a	+		+				+	n/a				+	n/a		n/a	n/a		O	n/a	n/a		?/-
Long Term	n/a	n/a	+		+				+	n/a				+	n/a		n/a	n/a		O	n/a	n/a		?/-
Direct / Indirect	n/a	n/a	I		I				I/D	n/a				I/D	n/a		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	n/a	n/a	T/P		T				T/P	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				L/GL	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				?					?															
Medium Term				?					?															
Long Term				?					?															
Direct / Indirect				D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/GL															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.7 D7 Public realm

### Policy description

This policy aims to ensure that the public realm is safe, accessible, inclusive, attractive, connected and easy to maintain. Public realm should also have regard to the historic and natural context of surrounding areas, and ensure high quality design.

### Initial appraisal and recommendations

#### Integrated impact assessment

Implementation of this policy is likely to promote social integration and community cohesion as it provides space for activities such as relaxation, physical activity and social events. This policy would positively affect accessibility and equality objectives as it has specific reference to inclusive design. Inclusive public spaces are particularly important in ensuring lesser mobile communities, wheelchair and buggy users are able to access opportunities, and participate within the community.

This policy also encourages a mutually supportive relationship between public spaces and their surroundings, which positively affects the area by providing good links between places. Additionally, greater emphasis on the relationship between public spaces and their context would benefit local built and cultural heritage, by encouraging change which is sensitive to key aspects of the local area.

With the implementation this policy, new public places should incorporate landscaping and planting which would contribute to enhancing the townscape character. Additional landscaping and permeable surfaces would also contribute toward Sustainable Urban Drainage Systems, which would increase resilience to flooding, as well as alleviate the Urban Heat Island effect. Furthermore, careful landscaping would have ecological benefits and increase biodiversity in the immediate area, and thus increase public access to nature. Altogether, this would increase London's resilience to the effects of climate change.

This policy would have positive effects on crime and security as it emphasises the relationship between the public realm and surrounding buildings, and prioritises natural surveillance in developments in view of the public realm. In addition, the promotion of safe and inclusive public spaces, such as through safe crossings on the local transport network, would encourage active travel. Creating a safe and attractive environment would encourage people to use more sustainable forms of travel, which could reduce vehicle traffic.

Increasing levels of active travel would have beneficial health effects locally through increased levels of exercise as well as decreased levels of transport related air pollution and noise emissions. This benefit is further supported by the policy's support for play and social areas.

#### Cumulative

This policy aligns with policies G7 Trees and woodland, G5 Urban greening, S1 Developing London's social infrastructure, HC1 Heritage conservation and growth and HC2 World heritage sites which support the provision of a London environment with health and wellbeing in mind. Additionally, the combination of these policies may create inclusive communities which actively influence health and wellbeing.

#### Recommendations

This policy could reference the role of public space in supporting higher density development and encouraging localised regeneration, use of public or active transport modes, and measures to improve ease of movement around the built environment and to wider networks. Improved legibility is

particularly important for residents with cognitive and sensory impairments. It was also suggested that reference to safety measures, including lighting and design measures, could be further detailed. Safety in public spaces is particularly important for higher risk groups, such as religious and ethnic minority groups, women and LGBTQ communities to ensure they feel able to participate in opportunities.

More information on the actions to be taken to support climate change resilience could be provided. Beyond open and green spaces, this policy could encourage biodiversity in other public realm spaces, such as through green infrastructure. Further detail on how the policy could maximise active travel and support the reduction of transport related emissions could also be provided.

### GLA response

The GLA clarified the policy to show the relationship to sustainable development and active travel, and its importance in higher density development. Further text was added to the supporting text to provide more specific wording on safety and security, lighting, legibility, connectivity, and ease of movement.

However the GLA advised that policies around sustainable drainage, urban greening, air quality etc. providing more detail in regards to climate change resilience.

### Appraisal of finalised policy

No further appraisal required as the changes made to the policy do not materially change the policy's impacts, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 62: D7 Public realm

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		O	n/a	n/a	n/a	n/a	O	O	O	n/a	O	O	+	O	+	n/a	n/a
Medium Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Long Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Direct / Indirect						I	I/D		I/D	n/a	n/a	n/a	n/a	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L/GL/W	L	n/a	L/GL	L/GL	L	L	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	O	n/a	?	O	O	O	n/a	O	n/a	n/a	O	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	O	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Long Term	++	++	+	+	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Direct / Indirect	D	D	D	D	n/a	I	I	I	I	n/a	D	n/a	n/a	I	n/a		n/a	n/a	n/a	I	I	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a	L/GL	n/a		n/a	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	n/a				O	+		n/a	n/a		+	n/a	n/a		n/a
Medium Term	+	+	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Long Term	+	+	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		n/a				D	n/a				I/D	I/D		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	T/P		n/a	n/a		T/P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W		n/a				L/GL	n/a				L	L		n/a	n/a		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.2.8 D8 Tall buildings

### Policy description

Tall buildings have a role to play in accommodating the expected growth in London, by optimising density and encouraging a sustainable and efficient use of finite land. The policy supports the role of tall buildings in their contribution to legibility, wayfinding, and the enhancement of London's skyline. The policy requires a consideration of the visual, functional and environmental impacts of tall buildings to be taken into account when making decisions on specific development proposals.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would result in a range of positive effects across a number of social, economic and environmental objectives, and contribute to meeting London's growth needs.

The policy supports the role of high quality, well designed tall buildings in appropriate locations across the city. High quality tall building developments can help to support higher densities in a sustainable way, through the optimisation and efficient use of land. This can play a role in relieving housing and other land use pressures, and contribute to a range of uses through mixed use development. The consideration of wind, sunlight, noise and air circulation, along with appropriate management and maintenance arrangements will help to reduce adverse impacts typically associated with higher density developments. High quality materials will also help to ensure tall buildings provide safe and secure environments for a range of uses.

Environmentally, tall buildings offers opportunities to realise energy efficiencies which can help meet growth needs with minimal effects on the air quality objectives. While it would not contribute in reducing the overall amount of emissions, it could improve the air quality in certain locations. High density development may however have implications for localised flood risk, and would require sufficient design mitigation to manage these potential impacts.

As well as supporting high quality design, the policy considers the space around tall buildings, to ensure the surrounding public realm remains useable, attractive and safe. There is strong emphasis regarding the 'on the ground' impacts of tall buildings, particularly their contribution to a vibrant streetscape through active frontages, and associated public realm. Inclusive design and public spaces could help to stimulate localised regeneration through new cultural and retail provision, job creation, and opportunities for social inclusion. The policy is therefore likely to result in positive effects on the accessibility and connectivity, and appropriately located tall buildings can support greater use of public transport. Particularly in Central London, tall buildings may contribute to pedestrian congestion along key routes and around stations, however with appropriate design mitigation this is unlikely to cause significant adverse impacts.

The policy places substantial emphasis on the contribution of tall buildings to legibility and wayfinding in London, offering recognisable features that can be viewed widely across the city. Developing symbolic features within London skyline could benefit the economy, attracting a range of uses and occupiers from around the world.

#### Cumulative

This policy complements policies H18 Large scale purpose built shared living and D6 Optimising housing density which support the provision of high density accommodation. Additionally, the policy aligns with policies G4 Local green and open space, G6 Biodiversity and access to nature and G7 Trees and woodland which support the protection of greenfield sites and the reduction in land take.

Alternatively, the policy may conflict with SI7 Reducing waste and supporting the circular economy, as waste disposal systems are generally less efficient in tall buildings.

#### Recommendations

The policy could be more specific in referring to the types of housing that might be provided within new tall buildings across the capital. Similarly, the policy could expand on the expected regeneration opportunities associated with brownfield development, heritage sites and the provision of associated community infrastructure. This could include further detail as to how barriers to employment, skills and access could be overcome.

It was recommended that the policy more explicitly referenced linkages and connectivity between tall building developments, including reference to supporting services, transport infrastructure and Protected Vistas. The policy supports reducing adverse noise impacts surrounding the development of tall buildings where possible. It was recommended that noise thresholds and appropriate mitigation measures should be described further.

#### GLA response

The GLA clarified that regeneration opportunities, including appropriate uses, associated with tall building developments will depend on site circumstances, and will be determined in more detail through specific proposals under the relevant authority's Local Plan.

Minor amendments were made to the policy text to provide better clarity on the visual impacts associated with Protected Vistas and heritage assets. The GLA confirmed that other policies in the Plan, relating to transport infrastructure, density, economy, noise housing and social infrastructure, sufficiently address these recommendations in further detail, and are more specific to the objectives. Overall, no changes were proposed to be made to the draft policy.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. However, dependent on location and design of a tall building the presence of a new tall building could disrupt flight lines associated with European designated sites that support wader bird species such as Lee Valley SPA and Ramsar site and the South West London Waterbodies SPA/ Ramsar. For clarity it was recommended that this policy identifies that this is not an exhaustive list of environmental impacts that require consideration and other impacts such disruption to designated feature sight lines may be required.

**Table 63: D8 Tall Buildings**

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	+		n/a	+	+	n/a	n/a	O	n/a	n/a	+	n/a	n/a	n/a	O	+	n/a	O
Medium Term						+	+		n/a	+	+	n/a	n/a	O	n/a	n/a	+	n/a	n/a	n/a	O	+	n/a	O
Long Term						+	++		n/a	+	+	n/a	n/a	O	n/a	n/a	+	n/a	n/a	n/a	O	+	n/a	O
Direct / Indirect						I	D		n/a	I	D	n/a	n/a	I	n/a	n/a	I	n/a	n/a	n/a	D	D	n/a	D
Temporary / Permanent						T/P	T/P		n/a	P	T/P	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a	n/a	P	P	n/a	T/P
Local / Greater London / Wider Region / Global						L	L/ GL		n/a	L	L/ GL	n/a	n/a	L	n/a	n/a	Glo bal	n/a	n/a	n/a	L/ GL	L	n/a	L
<b>EQIA</b>																								
Short Term	O	O	n/a	n/a	O	+	+	O	O	O	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	O	n/a	n/a	O
Medium Term	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	O
Long Term	+	+	n/a	n/a	+	+	++	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	+
Direct / Indirect	D	D	n/a	n/a	D	D	D	D	I	I	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	I
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL
<b>HIA</b>																								
Short Term	n/a	?	n/a		+				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	?	n/a		+				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	?	n/a		+				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a		O
Direct / Indirect	n/a	I	n/a		I				n/a	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	P	n/a		T/P				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	L	n/a		L				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					I															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/ GL					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.9 D9 Basement development

### Policy description

This policy supports boroughs in establishing policies to address the negative impact of constructing large-scale basements beneath existing development. When evaluating large-scale basement proposals, boroughs should consider local ground conditions, flood risk and drainage, land and structural stability, protection of the natural and historic environments, and the potential impacts on air quality, light pollution, noise, vibration, dust and site waste.

This policy does support smaller-scale basement excavations, as when appropriately designed and constructed, these can contribute to more efficient uses of land.

### Initial appraisal and recommendations

#### Integrated impact assessment

By limiting the development of large-scale basements, this policy ensures local authorities consider a number of environmental aspects. It helps to ensure the local landscape and heritage assets are not adversely impacted by construction, and that ground conditions and flood risk are closely considered. Smaller-scale basements are less likely to have such severe impacts on the local environment.

Large-scale basements require the excavation of significant amounts of dirt, requiring the management of large amounts of ground material. The removal of this material, combined with increased HGV movements, could increase dust in the local area, impacting air quality and posing a health risk for those in proximity. The scale of these developments could also generate significant amounts of noise, impacting on the wellbeing of local residents and businesses. Construction management plans could help to control these impacts.

The support for smaller, more appropriate basement developments could be positive for local development by utilising land available to create bigger developments.

#### Cumulative

This policy aligns with policies SI12 Flood risk management and HC1 Heritage conservation and growth which support the protection of the environment and key receptors. This policy combined with SI12 Flood risk management and HC1 Heritage conservation and growth may mitigate against negative effects to health from large-scale basements.

### Recommendations

The policy could benefit from specifically mentioning the effect that basement development could have on the use of brownfield sites.

It was also recommended that the policy provide further details on the measures that will be taken to reduce flood risk, noise and how to ensure measures will be taken to protect/enhance the historic environment.

It was also recommended that the policy could provide some examples of mitigating measures local authorities could implement.

### GLA response

The GLA advised that the policy already referenced that this type of development contributed to the best use of land.

In relation to conserving the character and historic environment, noise and flood risk, the GLA advised that other policies in the plan provide protection for these.

The GLA also advised that many of the mitigating measures that could be employed during construction to limit impacts on air quality are common components of construction management plans. It is considered that the reference currently included in the text encompasses this. Furthermore, the Sustainable Design and Construction SPG also provides more specific guidance in relation to basements. It is intended that this guidance will be carried forward in an updated SPG.

No changes were proposed to be made to the draft policy.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 64: D9 Basement development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	O	O	O	?	n/a	O/-
Medium Term						+	n/a		n/a	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	O	O	O	?	n/a	O/-
Long Term						+	n/a		n/a	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	O	O	O	?	n/a	O/-
Direct / Indirect						D	n/a		n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a	n/a	I/D	I/D	I/D	D	n/a	I/D
Temporary / Permanent						T/P	n/a		n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	P	n/a	T
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a	n/a	L	L	L	L	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	O/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a		n/a	n/a	?	n/a	n/a	n/a	n/a	O/-
Medium Term	n/a	n/a	O/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a		n/a	n/a	?	n/a	n/a	n/a	n/a	O/-
Long Term	n/a	n/a	O/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a		n/a	n/a	?	n/a	n/a	n/a	n/a	O/-
Direct / Indirect	n/a	n/a	D	n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a		n/a	n/a	I/D	n/a	n/a	n/a	n/a	I/d
Temporary / Permanent	n/a	n/a	T	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T	n/a		n/a	n/a	T/P	n/a	n/a	n/a	n/a	T
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a		n/a	n/a	L	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	O/-		n/a				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	?		O/-
Medium Term	n/a	n/a	O/-		n/a				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	?		O/-
Long Term	n/a	n/a	O/-		n/a				n/a	n/a				O	n/a		n/a	n/a		n/a	n/a	?		O/-
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				D	n/a		n/a	n/a		n/a	n/a	D		D
Temporary / Permanent	n/a	n/a	T		n/a				n/a	n/a				T	n/a		n/a	n/a		n/a	n/a	T/P		T
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	L		L
<b>CSIAL</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.10 D10 Safety, Security and Resilience

### Policy description

This policy contributes to the overall resilience of London as a global city. It supports a safe and secure environment through appropriate design features, high quality materials and ongoing management of developments. This includes building resilience against a range of hazards such as fire, flooding, weather, terrorism and other related threats. Development proposals should contribute to minimising the potential risks and provide detail on relevant mitigation measures.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy would benefit the safety, security and accessibility of developments and public spaces across London. This includes positive effects on crime reduction using measures to design out crime and contribute to building resilience to emergency situations. The policy places a strong emphasis on high quality design, the use of safe materials, and role of ongoing management arrangements to minimise the impact of threats and hazards.

This policy supports making London a safer and more secure place, by improving resilience to a range of external shocks. This is encouraged through a range of inclusive design measures that do not shift vulnerabilities elsewhere. A safe and secure environment is likely to improve perceptions of safety for residents and visitors alike, and could have positive impacts on the economic and cultural performance of the city. This is particularly important for promoting opportunities for higher risk groups, including women, lesser mobile residents, religious and ethnic minority groups and LGBTQ communities.

There will be positive impacts for London's global competitiveness, particularly in terms of building the resilience of business, ensuring secure technology, and encouraging tourism. In terms of cultural opportunities, the ability to respond to potential risks could enhance opportunities for major events and large scale cultural activities. This could encourage increased participation, and play a vital contribution to London's cultural offer.

Environmentally, high quality design and effective partnerships with other bodies will help to reduce the exposure and vulnerability of London's residents and businesses to climate change, flood risks and other weather-related hazards. This could have a number of wider indirect benefits relating to improved health and perceptions of safety. Similarly, by supporting safe and secure public spaces, this policy could encourage increased active transport, along with participation in community and public events.

#### Cumulative

This policy complements policies D11 Fire safety, SI12 Flood risk management and SI1 Improving air quality which support the safety and wellbeing of Londoners through social and environmental management and design.

#### Recommendations

It was recommended that this policy could further reference the safety and security of more marginal, and higher risk groups, to ensure they can freely participate in public spaces and opportunities across the capital. This could include the sufficient provision of street lighting and appropriate transport options throughout the day and night.

The policy could also provide further information on improvements that could be incorporated in the retrofitting of existing buildings to improve safety and security. It was also recommended that further

detail be provided on measures to reduce crime levels and improve perceptions of safety. These could include sufficient street lighting, appropriate transport options at night, and 'passive surveillance' through night-time events and activities.

The policy specifically references flood risk as a potential threat to the city, however this could be broadened to include other weather related hazards.

### GLA response

Although no changes were proposed to be made to the draft policy, minor amendments were made to the text to provide further clarity.

GLA also clarified that safety and security improvements on existing developments would be implemented as redevelopment is needed. GLA also mentioned that the London Risk Register referred to in the supporting text of the policy details the range of weather related hazards. Some of the GLA's other responses included a reference to other policies for further details, policies that are more specific to the objectives.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 65: D10 Safety, Security and Resilience

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+/++	n/a	n/a	n/a	n/a	O	n/a	n/a	n/a	O	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+/++	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+/++	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/GL W	n/a	n/a	n/a	L/GL W	n/a	n/a	n/a	n/a	n/a
<b>EqIA</b>																								
Short Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	O		n/a	n/a	O	?	n/a	n/a	n/a	n/a
Medium Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	+		n/a	n/a	+	?	n/a	n/a	n/a	n/a
Long Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	+		n/a	n/a	+	?	n/a	n/a	n/a	n/a
Direct / Indirect	I	n/a	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	I/D		n/a	n/a	I/D	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P		n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	n/a	L/GL	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL W		n/a	n/a	L/GL W	L/GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	O/+	O/+	O/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	O/+	O/+	O/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	O/+	O/+	O/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				+						+														
Medium Term				+						+														
Long Term				+						+														
Direct / Indirect				I/D						I/D														
Temporary / Permanent				T/P						T/P														
Local / Greater London / Wider Region / Global				L/GL W						L/GL W														

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.11 D11 Fire safety

### Policy description

This policy supports the preparation of an independently produced fire strategy for each development proposal. In addition to the building regulations requirements, details on the construction (methods, materials and approach), means of escape and access to fire service personnel should be provided in the development proposals.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The use of fire strategies would increase safety across all buildings, particularly high-density tower blocks. Implementation of this policy would also facilitate improved access into and out of buildings, ensuring individuals are able to evacuate 'with dignity' regardless of any mobility issues or disability they may have. Policy requirements may have implications for older buildings that may require specific retrofitting if the building's use is to be retained.

#### Cumulative

This policy complements policy D10 Safety, security and resilience and D2 Delivering good design which support a safe and secure environment for Londoners by high quality design of materials and fire safety measures.

### Recommendations

This policy could clarify if existing development could also benefit from the preparation of a Fire Statement.

### GLA response

The GLA advised that the London Plan could only address issues that arose from planning permission therefore, the London Plan could not require this retrospectively to existing housing stock.

No changes were required.

### Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 66: D11 Fire safety

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Medium Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Long Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Direct / Indirect						n/a	I		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	n/a	I	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	P	n/a	P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	n/a	L	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				++					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.2.12 D12 Agent of change

### Policy description

This policy places the responsibility for noise mitigation on the applicant proposing a new development. Development proposals should ensure good acoustic design, explore mitigation measures and separate new noise-sensitive developments from existing noise-generating businesses. If the new development is likely to generate noise and to be located near a residential area, measures to mitigate and manage the noise impacts should be implemented.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

By putting the onus on the developer to consider existing noise-generating businesses when constructing new developments and provide mitigation where required, existing businesses and uses are protected from new complaints. This would protect many of London's vital businesses, such as pubs and clubs, and support the development and protection of the night-time economy. It also protects more noise generating industrial uses, allowing for the co-location of homes and light industry, where appropriate by ensuring appropriate design.

Noise is associated with health risks, including stress and lack of sleep. Therefore, by ensuring developers consider noise mitigation, such as insulation or appropriate layout such as positioning bedrooms away from noise, this policy would help to support the wellbeing of new residents. This is particularly important for higher risk groups such as older people, young children, pregnant women, and residents with a disability or existing health condition.

#### Cumulative

This policy complements policies HC6 Supporting the evening and night-time economy and D13 Noise which support the reduction in noise pollution and the growth of the night-time economy. The combination of these policies may allow the night-time economy to grow and increase health and wellbeing to local residents that may have previously been impacted.

#### Recommendations

It was recommended that further information be provided on development other than residential (i.e. schools, religious institutions) as other types of sensitive establishments could require additional consultation to ensure certain groups are not disproportionately impacted.

Also recommended that further detail be provided on mitigation measures that could be applied to industrial developments which generate noise. The policy should also emphasise the need to restrict or manage noise-generating activities in noise-sensitive areas.

This policy suggested boroughs should 'consider' refusing development proposal if no clear planned mitigation measures are presented. It was also recommended that boroughs should refuse development proposals if it is likely noise could severely impact the health and wellbeing of individuals.

### GLA response

The GLA clarified that this policy applies to all types of development, not just residential. In addition, the GLA referred other policies with the Plan that addressed the issues raised.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 67: D12 Agent of Change

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++
Direct / Indirect						n/a	I/D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						n/a	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>EQIA</b>																									
Short Term	n/a	n/a	+	n/a	+	+	+	n/a	n/a	?	n/a	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term	n/a	n/a	+	n/a	+	+	+	n/a	n/a	+	n/a	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	n/a	n/a	+	n/a	+	+	+	n/a	n/a	+	n/a	n/a	?	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	n/a	n/a	L	n/a	I	I	I	n/a	n/a	I	n/a	n/a	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	n/a	n/a	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	L	L	n/a	n/a	L/GL	n/a	n/a	L/GL	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																									
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			+
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			+
Direct / Indirect	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			D
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a			L
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.2.13 D13 Noise

### Policy description

This policy supports action to reduce, manage and mitigate noise levels in order to improve health and quality of life. Residential and non-aviation development proposals should: avoid significant adverse noise impacts; implement noise mitigation; demonstrate improvements and enhancements of the acoustic environment; separate new noise sensitive development from major noise sources; and promote technologies and improved practices to reduce noise at source and on the transmission path from source to receiver.

It also encourages boroughs to identify and nominate new ‘quiet areas’ and protect existing ‘quiet areas’. Noise action plans should be prepared for aviation development proposals.

### Initial appraisal and recommendations

#### Integrated impact assessment

Noise is associated with health risks, including stress and lack of sleep. This policy supports the reduction and appropriate management of noise disturbance, including the expansion and protection of designated quiet areas. By encouraging an improved acoustic environment and separation of noise sensitive development, this policy would help to improve the quality of life of residents and increase the availability of quiet, tranquil spaces for wellbeing needs. This is particularly important for higher risk groups, particularly pregnant women, young children, residents with cognitive or sensory impairments and those with wider mental health conditions.

Both innovative and traditional methods should be used to manage noise, considering the importance of good design in new developments to minimise the impact of noise. By supporting good design, this policy does not prohibit further growth, but ensures that new developments do not negatively impact on receptors and cause a significant change in the local environment.

The designation of quiet areas could contribute to the protection and enhancement of green and open spaces, which offer areas of tranquillity whilst also protecting local biodiversity.

#### Cumulative

This policy complements policies HC6 Supporting the evening and night-time economy and G4 Local green and open space which support tranquil areas for health and wellbeing effects. Additionally, growth of London’s night-time economy may benefit local resident’s employment opportunities within a growing market.

#### Recommendations

It was recommended that further information be provided on consultation whereby noise impacts are in proximity to sensitive intuitions, such as schools, places of worship and care homes. It was also recommended that further details on the management of the adverse noise impacts in existing communities was included. This could include detail on quiet areas designations and reference to adverse noise impacts arising from construction.

It was also suggested that further reference could be made to inclusive design and access to tranquil spaces, including appropriate legibility measures. This is particularly important in ensuring that lesser mobile residents, and those with cognitive or sensory impairments, have sufficient access to quiet spaces.

### GLA response

No changes are proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance.

The GLA advised that the policy requires boroughs are required to use procedures in the Defra’s Noise Action Plan for Agglomerations to designate Quiet Areas.

The GLA further advised that in relation to specific consultation whereby noise impacts are in close proximity to sensitive intuitions and the management of adverse noise impacts in existing communities is more appropriately address by boroughs in their local plans..

In terms of the impact of construction noise, the GLA advised that this would be addressed through further guidance to the Plan.

### Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 68: D13 Noise

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/	n/a	n/a	n/a	+
Medium Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/	n/a	n/a	n/a	+
Long Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/	n/a	n/a	n/a	++
Direct / Indirect						n/a	D		n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent						n/a	T/P		n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL		n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL
<b>EQIA</b>																								
Short Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+/	n/a	n/a	n/a	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+/	n/a	n/a	n/a	+
Long Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+/	n/a	n/a	n/a	++
Direct / Indirect	n/a	n/a	I/D	n/a	n/a	n/a	D	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent	n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		++
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.3 Housing

### 9.3.1 H1 Increasing housing supply

#### Policy description

This policy supports the delivery of a range of housing and mixed-use developments to meet ambitious housing delivery targets across the London Strategic Housing Market Area. The policy identifies ten-year targets for net housing completions for each local planning authority, who are responsible for identifying delivery options through the Local Plan process. In order to achieve these targets, the policy encourages boroughs to prepare delivery-focused Development Plans, with a strong emphasis on monitoring and updating housing trajectories on an annual basis. Significant emphasis is placed on exploring opportunities to optimise suitable and available brownfield development, and using proactive measures to overcome constraints to delivery. This includes targeted infrastructure investment to reduce risks and unlock development opportunities, and encouraging increased diversification in the house building industry.

Where new transport infrastructure is planned, the policy supports that's local planning authorities should take into account future public transport capacity and connectivity levels. This will increase opportunities to optimise site capacity and meet housing targets through increased densities.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The implementation of this policy supports a range of interventions to unlock development, and will help to facilitate the delivery of much needed housing across the capital. The emphasis on redeveloping brownfield sites, promoting small sites, intensification and renewal will help to ensure site capacity is optimised to help meet delivery targets. This will encourage local planning authorities to make the best use of existing land resources, and promote sustainable development patterns more broadly.

This policy is likely to improve accessibility as it promotes high density development on well-connected land, and in areas with high Public Transport Accessibility Levels. Optimising housing delivery around existing and future transport infrastructure schemes can improve access to services and encourage more sustainable modes of transport. This is particularly important in positively contributing to wider air quality, environmental and health objectives.

Measure to support housing delivery can have a number of wider economic benefits, including maintaining the balance of housing and employment across the city. The provision of high quality, housing would contribute to London's economic competitiveness by enhancing the attractiveness of the city as a place to work and live. In addition, well connected residential development can help to prevent unsustainable commuting patterns, and improve access to employment opportunities. There is a strong emphasis on promoting small house builders and tackling the construction skills gap, which could encourage training and job creation within the construction industry. More broadly, the policy supports mixed-used development, town centre renewal and regeneration, which would support a range of economic benefits and opportunities.

##### Cumulative

This policy aligns with policies E11 Sector growth opportunities and spatial clusters and D2 Delivering good design which support the delivery of high quality designs and growth of sectors such as

construction. This policy may provide growth opportunities; however, it needs to work in conjunction with schemes which provide buyers and tenants of a new supply of housing.

#### Recommendations

The policy could provide further reference to delivering housing to meet a range of needs, including affordable, adaptable and accessible units. This would particularly support the needs of lower-income communities, and residents with a disability or existing health condition. Additionally, the policy could further detail the role of cross-boundary delivery which can play an important role for constrained boroughs. In relation to increasing the density of development, additional detail could be provided on the supporting infrastructure required to underpin growth. This could include proximity to schools, health centres, public and active transport infrastructure and open space. The policy could also provide reference to high quality design and layout of development in order to mitigate potentially adverse impacts associated with high density, mixed-use development.

#### GLA response

The GLA clarified that issues surrounding affordable and accessible housing, along with infrastructure provision and design were covered sufficiently in separate housing policies, including H5 Delivering Affordable Housing, H13 Housing Mix, and D5 Accessible Housing. The intention is for the Plan to be read as a whole, and therefore it is not considered necessary to cross-reference to other housing and infrastructure policies. As a result, no changes were proposed to be made to the draft policy, although minor changes to the text were made to the supporting text.

The GLA also confirmed that housing targets are based on the capacity of individual boroughs and therefore reflects the constraints different boroughs face.

#### Appraisal of finalised policy

No further appraisal is required as there are no proposed changes to the draft policy.

#### Implications for the HRA

Outcome of HRA screening showed the potential for likely significant effects. The quantum of growth provided does have the potential to result in locally significant effects upon European designated sites, although this is dependent on the ultimate location of the development.

This policy is therefore a main aspect for discussion in the HRA report itself.

Table 69: H1 Increasing housing supply

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		?	+	O	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						D	D		I	D	I	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	P		T/P	P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		L	L/GL	L/GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	+	n/a	+	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I/D	n/a	D	D	I/D	I/D	I/D	I/D	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T/P	n/a	P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL	n/a	L/GL	L/GL	L	L	L	L	L/GL	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I/D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		L/GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.3.2 H2 Small sites

### Policy description

This policy supports the delivery of well-designed housing on small sites, encouraging this delivery mechanism to make a greater contribution to the overall housing supply of the city. A key aspect of this policy is to support small and medium house builders, as means of diversifying the approach to housing delivery, and helping to increase certainty within the development process. To meet a range of housing needs and ambitious delivery targets, the policy supports incremental intensification of small sites, to optimise land capacity and accommodate affordable housing contributions. The policy assets that boroughs should identify appropriate locations to accommodate additional housing provision, promote good design and deliver on the small site targets. However, development should not give rise to an unacceptable level of harm to residential privacy, designated assets, or biodiversity.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy strongly supports the role of small sites in contributing to overall housing delivery, and proactively encourage measures to unlock small parcels of land. The policy also strongly supports using small sites to secure affordable housing contributions, and making provision for adaptable and accessible units. This can have a number of positive impacts for communities, helping to increase access to housing, reduce homelessness and overcrowding, and helping to meet the needs of lesser mobile communities.

This policy would also have positive effects in terms of sustainability and wider place-making. There is a strong emphasis placed on high quality design and encouraging mixed-used development. The redevelopment of brownfield sites for housing and mixed use development can stimulate wider regenerative impacts, and promote sustainable development patterns by optimising site capacity.

This policy encourages high density development on small sites in well-connected locations, particularly areas with a high Public Transport Accessibility Level (PTAL). This could help to ensure housing is delivered in appropriate locations, with good access to services and opportunities for active travel. There is particular emphasis on unlocking small site developments in accessible parts of outer London, to help address housing needs and capitalise on existing transport infrastructure.

Alleviating housing pressures through a range of delivery mechanisms can have a number of positive effects on the economic competitiveness of London. Meeting housing demands can help to maintain the attractiveness of London as a place to work and live, and can improve access to employment opportunities. In addition, bringing forward small development sites can play a role in supporting small and medium construction businesses, who may not have the capacity to work on major developments.

It is also expected that this policy would have positive effects on the natural environment by ensuring all new development makes a contribution to open space and green infrastructure provision, and mitigates the loss of any green spaces appropriately.

#### Cumulative

This policy complements policies SD6 Town centres - strategy, D7 Public realm and G4 Local green and open space which support the protection of the environment through small developments and creating a public realm which increases health and wellbeing. This policy may conflict with SD1 Opportunity Areas which support large scale new developments within growth areas across London that may take a significant proportion of land.

### Recommendations

The policy could provide further information on communal spaces and public realm underpinning small site housing development. This would help to encourage a sense of community and amenity value in relatively small schemes. It could also provide further detail on the accompanying physical and social infrastructure, in addition to transport, that could help to mitigate adverse impacts of high density development.

Additional detail could be provided to evidence how small and medium sized house builders could be supported within the market, including reference to training, partnership working and overcoming challenges surrounding the viability and speed of delivery.

### GLA response

The GLA advised that design codes developed by boroughs would deal with issues such as communal spaces within small developments for example. The GLA advised that other policies with the Plan addressed issues such as social infrastructure and active travel. The GLA also advised that additional measures to help small and medium sized house builders is set out the Mayor's Housing Strategy

### Appraisal of finalised policy

The implementation of the finalised Policy would have positive effects on the provision of environment, social and physical infrastructure. It would also contribute in reducing the emissions, help tackling climate change, promote the enjoyment and benefits of the natural environment, and promote the use of brownfield sites.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy does not add to the overall housing quantum identified in Policy H1.

Table 70: H2 Small sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	O	O	+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	O	O	+	n/a	n/a
Long Term						+	+		+	+	++	n/a	n/a	+	n/a	+	n/a	n/a	n/a	O	O	+	n/a	n/a
Direct / Indirect						D	I/D		I	D	I	n/a	n/a	I	n/a	I	n/a	n/a	n/a	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L		L	L/GL	L/GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	L	L/GL	n/a	n/a
<b>EQIA</b>																								
Short Term	?	?	n/a	n/a	+	+	+/?	+	+	+/?	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	?	?	n/a	n/a	+	+	+/?	+	+	+/?	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	?	?	n/a	n/a	++	+	+/?	+	+	+/?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	n/a	D	I/D	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	n/a	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				n/a	n/a		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		P				n/a	n/a				n/a	n/a		n/a	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/GL				n/a	n/a				n/a	n/a		n/a	n/a		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.3.3 H3 Monitoring housing targets

#### Policy description

This policy supports local authorities in monitoring housing delivery against ten-year targets, taking into account homes lost through demolition or change of use. The policy acknowledges that there will be variability surrounding annual housing completions, and uncertainties in the phasing and delivery of large, complex sites. It is therefore encouraged that local planning authorities assess housing delivery against policy targets at the end of each five year period. To ensure a comprehensive development pipeline, the policy emphasises the role of housing trajectories and the Development Plan process to help meet ambitious housing targets.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The implementation of this policy would contribute to the overall understanding of housing need across a range of accommodation types, as it supports the appropriate monitoring of housing delivery against targets. This includes ensuring smaller sites, and accommodation that is not self-contained, are suitably counted as contributing to the overall stock. An understanding of delivery performance against targets could help to better direct future housing supply, and support proactive measures in areas of shortfall or under-delivery.

A more comprehensive monitoring and review process of housing delivery against London-wide targets could help to effectively plan for future need, and improve certainty in the development pipeline. This could also inform further evaluation surrounding constraints to delivery, in terms of site suitability, developer uncertainties, and infrastructure provision.

##### Cumulative

This policy complements policies H1 Increasing housing supply and SI2 Minimising greenhouse gas emissions which support the delivery of housing accommodation and the sustainable emissions of greenhouses associated with development. This policy, in conjunction with H1 Increasing housing supply may increase efficiency of housing provision through a comprehensive plan, which demonstrates the local needs.

##### Recommendations

The policy could further detail measures in place to ensure that borough's with land constraints are not unfairly penalised. This could include reference to how challenges surrounding site release, infrastructure provision and availability of brownfield land could be overcome.

#### GLA response

The GLA clarified that issues relating to individual borough land constraints, or other obstacles to delivery, are taken into account when setting housing targets through the SHLAA. As a result, no changes were proposed to be made to the draft policy.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 71: H3 Monitoring housing targets

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I/D	n/a		n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		I				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/GL /W				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.4 H4 Meanwhile use

#### Policy description

This policy aims to encourage local authorities within London to identify opportunities for meanwhile uses, in order to make efficient use of vacant land while it is waiting longer-term development. There is particular emphasis on delivering meanwhile housing units through precision manufacturing, to help increase short term demand, and encourage further re-use of units at a later date to occupy another site.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The implementation of this policy would promote efficient and flexible use of otherwise vacant land. This can have a number of benefits on both housing delivery and wider social and economic objectives.

The policy places particular emphasis on utilising vacant land for meanwhile housing, and suggests that it could be provided in the form of precision-manufactured homes. This could temporarily increase the available stock of homes at any given time, and help to meet a range of short term, localised needs. Meanwhile housing delivering would reduce construction time, and provide opportunities for the re-use of units on other vacant land sites. This contributes to sustainable forms of development, and broadly promotes the principles of the circular economy.

In terms of wider economic and social benefits, meanwhile uses can help to keep sites active during long term development phases. This can help to ensure continuity for local communities, and provide support for and increase the viability of local services and facilities.

##### Cumulative

This policy complements policies H11 Ensuring the best use of stock and D6 Optimising housing density which support the need for housing provision in the short term. This policy potentially conflicts with policies H13 Build to rent, H17 Purpose built student accommodation and H18 Large scale purpose built shared living, which promote long-term investment in specific accommodation, of which the current provision may not meet the existing needs.

##### Recommendations

The policy could provide further detail surrounding affordable meanwhile housing, and how this could be accommodated. This would particularly support the needs of lower-income communities. Similarly, additional information on the material likely to be used for the construction of meanwhile housing could be included as part of the policy.

#### GLA response

The GLA clarified that meanwhile housing is implicitly about the provision of affordable housing albeit temporary housing. The GLA also advised that the material to be used for constructing meanwhile housing is not appropriate for the London Plan.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 72: H4 Meanwhile use

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	
Medium Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	
Long Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	
Direct / Indirect						I/D	n/a		n/a	n/a	D	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	D	I/D	n/a	
Temporary / Permanent						T	n/a		n/a	n/a	T	n/a	n/a	n/a	n/a	T	n/a	n/a	n/a	n/a	P	T	n/a	
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	L	L/ GL	n/a	
<b>EQIA</b>																								
Short Term	n/a	n/a	+	n/a	++	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+	n/a	+	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	+	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	D	n/a	D	n/a	D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T	n/a	T	n/a	T	n/a	n/a	n/a	T	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T		T				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- Objectives**
1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  4. To contribute to safety and security and the perceptions of safety
  5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  8. To maximise accessibility for all in and around London
  9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  22. To conserve London's geodiversity and protect soils from development and over intensive use.
  23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.5 H5 Delivering affordable housing

#### Policy description

This policy supports the delivery of affordable housing to help meet London's strategic need. There is a strong emphasis in the plan on the long term strategic target of 50 per cent of all new homes delivered in London being affordable. This is expected to be achieved through a range of sources, including the threshold approach to viability, grant and ensuring that land values embed affordable housing contributions.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would result in a number of positive effects surrounding social and economic objectives, as it supports that 50 percent of all new homes in London should be affordable. This could contribute to creating mixed-use and inclusive communities, and help to meet long term strategic housing needs across London. The appropriate provision of affordable housing could help to relieve housing pressures, including homelessness, access to housing for lower-income communities and reduce overcrowding.

The provision of affordable housing could support wider economic growth agendas, by supporting key workers and lowering barriers to employment. Housing affordability more broadly could help to maintain the vitality and diversity of London, and maintain its attractiveness as a place to work and live.

The early identification and provision for affordable housing will contribute to developer certainty, and will provide greater clarity surrounding scheme viability. Through the provision of new affordable homes, the demand for energy and local energy generation could be reduced as new homes are typically cheaper to heat and more energy efficient. Therefore this policy would have positive effects on the energy use and supply objective.

##### Cumulative

This policy aligns with policy H16 Accessible housing, E3 Affordable workspace and S1 Developing London's social infrastructure which support the delivery of affordable housing with associated social infrastructure and employment opportunities to those who require it.

##### Recommendations

It was recommended that a clear definition of affordable housing is provided as part of the policy text. The Government has their own definition however it appears the definition of affordable housing for charities such as Shelter differs. In addition to this, it is likely the definition of affordability in London would vary when compared to the rest of the country.

The policy could provide further information on the quality and the design of the affordable houses, including reference to space standards. This could also include reference to the range and choice of housing, including accessible and adaptable options to support the needs of lesser mobile communities, and older residents. It should also provide details on the location of affordable housing in relation to affordable transport options and employment opportunities.

#### GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text. The GLA advised that the design and housing quality applied equally to both market

and affordable homes and is set out in Policy D4. In relation to the location of affordable housing, the GLA clarified that affordable housing should be provide as part of an overall housing scheme. The GLA also advised that Policy H6 Affordable Housing Tenure addressed issues of definitions of affordable housing

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 73: H5 Delivering affordable housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		n/a	+	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		n/a	+	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I		n/a	I	D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						T/P	P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	L/GL	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	++	+	++	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	I	I/D	I/D	n/a	I/D	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	L	L/GL	n/a	L	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				n/a	n/a							+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a							+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		++				n/a	n/a							+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I/D		I/D				n/a	n/a							I	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		T/P				n/a	n/a							T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/GL				n/a	n/a							L	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.6 H6 Threshold approach to applications

#### Policy description

This policy aims to maximise the delivery of affordable housing, using a threshold approach to large development proposals. These thresholds apply on developments that include the delivery of more than ten units or a combined floor space greater than 1,000m<sup>2</sup>. The policy recognises the role public sector land can play in meeting affordable housing need, and supports the use of public grants and the efficient use of available resources to achieve this outcome.

The policy supports a Fast Track Route of the threshold approach for applicants who meet or exceed relevant threshold level of affordable housing, are consistent with relevant tenure split, and meet all other relevant Policy requirements. Fast track applicants are not required to provide a viability assessment at the application stage.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support the delivery of much needed affordable housing across London, through setting out a consistent and transparent approach to viable delivery models. The policy will contribute to improving developer certainty by standardising the approach to viability assessments, and encouraging greater transparency in the contributions required. This includes putting in place viability review mechanisms to align affordability delivery with potential improvements in viability throughout the development period.

A more certain and viable approach to affordable housing delivery could help to maximise provision across new developments and help meet the housing needs of all Londoners. This could result in a number of positive outcomes, particularly in terms of improving access to housing for lower-income communities along with encouraging diverse and inclusive communities. The policy emphasises the importance of meeting a range of affordable housing needs, including making provision for family-sized homes.

Affordable housing delivery can also have a number of economic benefits. The lack of affordability in the housing market can act as a significant barrier to employment, as people cannot afford to live and work in the city. Sufficient provision of affordable housing can therefore help to retain labour in the capital, particularly in key public service areas and lower skilled employment.

##### Cumulative

This policy complements policies H7 Affordable housing tenure, D7 Public realm and D10 Safety, security and resilience which support the delivery of affordable housing and the fast-tracked provision of accommodation to meet London's needs.

##### Recommendations

The policy could provide a clear definition of affordable housing, particularly as the Government and charities such as Shelter each have slightly differing definitions. In addition to this, it is likely the definition of affordability in London would vary when compared to the rest of the country.

Further reference could be made to the trade-offs associated with delivering affordable housing, particularly in relation to the release of SIL and potential loss of lower skilled jobs. Further detail could also be provided on the quality and design of housing, along with expectations surrounding transport access and service provision associated with delivery.

#### GLA response

The GLA clarified that issues relating to the trades off associated with the release of SIL, and details surrounding what is considered acceptable for release are covered in the economy policies. It was noted that further details surrounding design, social infrastructure provision health and definitions of affordable housing were also covered elsewhere in the Plan. As a result, no changes were proposed to be made to the draft policy, although minor amendments were made to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 74: H6 Threshold approach to applications

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	n/a		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term						+	n/a		n/a	+	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term						+	n/a		n/a	+	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect						I	n/a		n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	+	+	+	n/a	++	+	+	n/a	n/a	+	++	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	D	D	D	n/a	D	I/D	I	n/a	n/a	I	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	n/a	P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L	L	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																									
Short Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	?
Medium Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	?
Long Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	n/a	n/a	I		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	L
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.3.7 H7 Affordable housing tenure

#### Policy description

The policy supports the delivery of genuinely affordable housing by providing a minimum of 30% low cost rented homes, a minimum of 30% intermediate products and 40% to be determined by the relevant borough. This includes the consideration of annual housing costs, capped at a percentage of income. The tenure splits should provide sufficient flexibility to be tailored to meet local needs, with boroughs setting other eligibility criteria where appropriate.

The policy also supports the use of the Fast Track Route for schemes delivering the threshold level of affordable housing.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

This policy recognises the need for low cost housing in the capital, and supports a range of affordable options delivered as part of new developments. This includes provision for low cost rental housing and intermediate home ownership, which will help overcome existing barriers faced in accessing the housing market. The provision of a range of affordable accommodation would help to ensure that London's housing market meets a diverse range of needs, by supporting mixed-use and inclusive communities. More specifically, this policy could accommodate the needs of lower-income households, and support the transition to home ownership for residents across the city more broadly. High quality housing can play a role in improving the safety, health and security of particularly sensitive communities.

The policy emphasises the flexibility required to tailor housing needs according to Borough characteristics and identified shortfalls. The sufficient provision, and appropriate targeting, of affordable housing can help to address a range of challenges, including overcoming barriers to employment, improving health outcomes and tackling overcrowding. Maintaining affordability in the housing market can also have a number of economic benefits for London as a whole. This could include helping to retain labour in the capital, and improving the city's attractiveness as a place to live and work.

##### Cumulative

This policy complements policies D7 Public realm and D10 Safety, security and resilience and H13 Build to rent which support the delivery of affordable housing and the provision of accommodation in the long and short term to meet London's needs.

##### Recommendations

The policy could provide further information on inclusive, accessible and adaptable affordable housing options, to ensure all communities can benefit from these housing opportunities. This would particularly support the needs of lesser mobile and older residents in accessing affordable, high quality housing. Further detail could also be provided on infrastructure provision supporting affordable housing delivery, such as access to public transport, services and employment locations.

The regenerative potential of high quality affordable housing could also be further explored, particularly in relation to public realm, job creation, and the re-use of brownfield land.

#### GLA response

The GLA clarified that issues relating to infrastructure, inclusive design and quality of affordable housing are covered elsewhere in the Plan. The GLA advised that Chapter 1 of the draft London Plan set out the regenerative potential of high quality affordable housing, including associated benefits around job creation and the re-use of brownfield land. As a result, no changes were proposed to be made to the draft policy, although minor amendments were made to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 75: H7 Affordable housing tenure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	n/a		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	n/a		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	n/a		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a		n/a	I	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	++	+	++	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	D	I/D	I/D	n/a	n/a	I	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/ GL	L/ GL	L	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		++				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		I	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		P				n/a	n/a				n/a	n/a		T/P	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		L/ GL				n/a	n/a				n/a	n/a		L/ GL	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.8 H8 Monitoring of affordable housing and review mechanisms

#### Policy description

This policy supports boroughs in implementing a clear monitoring process to ensure affordable housing, and off-site contributions, are secured in line with S106 agreements. The policy supports improved transparency in the planning process, to help communicate how contributions are spent to the public.

It also aims to ensure that local authorities carry out review mechanisms, and implement and record the delivery of additional homes or cash in lieu. The outcome of review mechanisms should be monitored and shared with the GLA to inform their annual monitoring process.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support a more transparent approach to affordable housing contributions, as part of new developments. A comprehensive approach to monitoring and reviewing S106 agreements will provide a clearer understanding of affordable housing delivery and any shortfalls. This information can then be used to inform future negotiations, and help to target need.

It is expected the provision and ongoing monitoring of affordable housing will help meet London's housing needs, and help maintain London's attractiveness as a place to work and live. Transparency of delivery could help to increase the supply of affordable units in line with developer obligations, and encourage inclusive and diverse communities.

##### Cumulative

This policy complements policies D7 Public realm and D10 Safety, security and resilience and S1 Developing London's social infrastructure which support the effective and efficient provision of affordable housing to meet London's needs.

##### Recommendations

It was recommended that the policy could provide further information on the supporting infrastructure required to underpin development, along with reference to inclusive design and access to support the needs of lesser mobile groups.

#### GLA response

No changes were proposed to be made to the draft policy. The GLA advised that issues relating to infrastructure, inclusive design and access were addressed elsewhere in the Plan. As the Plan should be read as a whole there is no need for such cross referring.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 76: H8 Monitoring of affordable housing and review mechanisms

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a			n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a			n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a			n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	?	?	+	n/a	+	+	n/a	n/a	n/a	n/a	+	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	++	+	n/a	n/a	n/a	n/a	+	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	++	+	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I	n/a	D	I/D	n/a	n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L	n/a	n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	n/a	n/a	+		+					n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+		++					n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+		++					n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I/D		D					n/a	n/a							I	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T/P		P					n/a	n/a							T/P	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		L/ GL					n/a	n/a							L	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																									
Short Term				n/a						n/a															
Medium Term				n/a						n/a															
Long Term				n/a						n/a															
Direct / Indirect				n/a						n/a															
Temporary / Permanent				n/a						n/a															
Local / Greater London / Wider Region / Global				n/a						n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.9 H9 Vacant building credit

#### Policy description

This policy supports the appropriate management of vacant building credit, to ensure it contributes to development needs and does not undermine affordable housing provision. The policy sets out the limited circumstances where the Vacant Building Credit (VBC) should be applied, to provide an incentive for brownfield development on sites containing vacant buildings that would not otherwise come forward for development.

Applicants are required to demonstrate that the building has been vacant for a continuous period of five years, and provide evidence the site has been actively marketed for at least two of the five years. The VBC is not anticipated to bring forward significant levels of additional development in London, and could have long term implications for the delivery of affordable housing.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The appropriate implementation of this policy would result in the sustainable development of brownfield land, bringing back into use other vacant uses. This could contribute to the overall stock of housing, and provide a range of uses on previously unoccupied land.

In the limited instances where the VBC should be applied, it could have adverse impacts on affordable housing by reducing the requirements for contributions based on the amount of vacant floor space brought back into use. The policy acknowledges the implications the VBC could have on affordable housing provision, and therefore encourages decision-makers to consider local and strategic needs for affordable housing, and alternative viability procedures.

By limiting the application of the VBC, the policy could support the appropriate management of vacant building credit to ensure it contributes to development needs and does not undermine affordable housing provision. This would encourage a housing market that meets a range of needs and supports diverse and inclusive communities.

The redevelopment of vacant buildings could support wider placemaking objectives, encouraging lighting, public realm and the presence of people throughout the day and night, in previously unoccupied areas. This could help to improve perceptions of an area, stimulate regenerative activity, and could play a role in reducing crime. Safe neighbourhoods are particularly important for higher risks groups, including women, ethnic minority and religious groups, and LGBTQ communities, to ensure all residents feel comfortable and able to participate in public spaces.

The sustainable re-use of existing buildings also broadly promotes the principles of the circular economy, and encourages efficient use of finite land resources.

##### Cumulative

This policy complements policies SI2 Minimising greenhouse gas emissions, G4 Local green and open space and H11 Ensuring the best use of stock which support the redevelopment of brownfield sites and the protection of surrounding greenfield sites.

##### Recommendations

It was recommended that further information could be provided on the supporting infrastructure to underpin the redevelopment of vacant uses, and connect residents to key services. This includes

reference to a range of accessible and adaptable uses to support the needs of lesser mobile residents and older people. The regenerative role of brownfield development and re-use of vacant buildings could be explored further.

#### GLA response

The GLA advised the issues recommended are addressed elsewhere in the Plan. Therefore no changes were made to the draft policy, although minor editing changes were made to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Theoretically, Policy H9 (Vacant Building Credit) could indirectly lead to adverse effects on SACs/SPAs/Ramsar sites in conjunction with those policies setting the housing targets for each borough, as the policy advocates a mechanism to facilitate the potential for re-development on vacant brownfield sites that would not otherwise come forward for development. However, the policy makes clear that in London, this kind of development opportunity is highly unlikely to come forward, and it is also clear that the scale of development would be likely to be extremely limited.

Therefore, it is possible to conclude no likely significant effects of policy H9 on European protected wildlife sites.

Table 77: H9 Vacant building credit

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Medium Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Long Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Direct / Indirect						D	n/a		n/a	D	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	n/a	I	I	D	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	L	L	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		I				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.10 H10 Redeveloping existing housing and estate regeneration

#### Policy description

This policy supports the redevelopment of existing housing to achieve higher densities where possible. There is a strong emphasis on the contribution that regeneration and intensification of existing housing uses can make in meeting long term housing needs. Loss of existing housing will only be considered acceptable in instances where it is replaced at existing or higher densities. Any loss of affordable housing should be replaced with equivalent or better quality accommodation, and should generally seek an uplift in overall provision.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support the intensification of London's existing housing stock, and contribute towards meeting London's long term housing needs. The policy supports an uplift in overall affordable housing provision, and an improvement in quality where possible. This is likely to encourage greater equality within the housing market, and promote mixed-use and diverse communities.

An increase in affordable housing stock could help to improve access to housing for lower income communities, and make more efficient use of existing land resources. The policy emphasises the importance of resident consultation when undertaking redevelopment and regeneration schemes, providing opportunities for communities to actively engage and participate in the process.

The delivery of high quality, high density units could have a number of economic benefits for London as whole. Such schemes could help to overcome barriers to employment, particularly for lower income communities, and maintain the city's attractiveness as a place to live and work. This could help to retain labour within the capital, and contribute to London's overall economic competitiveness.

The policy strongly supports the sustainable use of land, helping to unlock sites to maximise development capacity. Estate regeneration is promoted as an opportunity to improve the social, economic and physical environment in which homes are located. Depending on the nature of these improvements, they could improve access to infrastructure and services, and contribute to wider placemaking objectives. These wider regenerative considerations will help to mitigate potentially adverse impacts associated with high density development, and could specifically support the needs of lower-income communities.

##### Cumulative

This policy complements policies G4 Local green and open spaces, SI1 Improving air quality and SD10 Strategic and local regeneration which support the re-use of buildings and protection to the environment, through green space provision and conservation of the green belt. This policy conflicts with policies H17 Purpose built student accommodation, H18 Large scale purpose built shared living and SD3 Growth Areas in Wider South East and Beyond, which support the delivery of new developments.

##### Recommendations

It was recommended that further detail could be provided on the range of housing types, such as accessible and adaptable provision, to ensure that the needs of lesser mobile communities, and those with 'invisible' disabilities, are met. It was also recommended that further detail was provided on the types of social, economic and environmental improvements that could be expected to support higher density development. This included further reference to the role of design in the redevelopment process, and any wider impacts on the townscape.

#### GLA response

The GLA clarified that further detail surrounding supporting infrastructure, design and inclusive access were provided in other sections of the Plan. The policy was however amended to reference the quality of housing. Minor amendments and clarifications were added to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 78: H10 Redeveloping existing housing and estate regeneration

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	+	?	?	+	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Medium Term	+	+	+	+	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Long Term	+	+	+	+	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Direct / Indirect	D	D	I	I	D	I/D	I/D	I/D	n/a	n/a	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	P	P	P	T/P	n/a	n/a	P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				n/a	n/a							+	n/a		n/a	n/a	n/a		+/?
Medium Term	n/a	n/a	+		+				n/a	n/a							+	n/a		n/a	n/a	n/a		+/?
Long Term	n/a	n/a	+		++				n/a	n/a							+	n/a		n/a	n/a	n/a		+/?
Direct / Indirect	n/a	n/a	I		D				n/a	n/a							I	n/a		n/a	n/a	n/a		I
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a							T/P	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/ GL				n/a	n/a							L	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.3.11 H11 Ensuring the best use of stock

#### Policy description

This policy supports the efficient use of land and seeks to maximise the existing housing stock in London through the re-use of vacant or unfit buildings. It acknowledges the high level of competition on land resources in London to support a variety of uses, and therefore supports opportunities to bring vacant stock back into use. This includes boroughs making appropriate use of Empty Dwelling Management Orders to bring forward vacant stock as affordable housing, and monitoring the use of dwellings as holiday rentals.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support the maximisation of London's housing stock, and help to meet a range of long term housing needs. Although vacant stock accounts for less than one percent of London's total housing stock, measures to proactively bring vacant units back into use could optimise available capacity.

The use of Empty Dwelling Management Orders to transform vacant stock into affordable housing could help deliver much needed affordable accommodation, and would support diverse and inclusive communities. Bringing vacant units back into use can also have a range of regenerative benefits, such as an improved perception of an area, reduced levels of crime, and helping to address wider challenges surrounding overcrowding.

##### Cumulative

This policy supports policies HC1 Heritage conservation and growth, G7 Trees and woodlands, SI7 Reducing waste and supporting the circular economy and D6 Optimising housing density which support the protection of land and effective development.

##### Recommendations

It was recommended that the policy could make further reference to inclusive, accessible and adaptable housing, to ensure the needs of lesser mobile communities, and those with 'invisible' disabilities, are met. It was also recommended that more details could be provided on the 'tools available' suggested to reduce the number of unfit and/or vacant homes. The role of affordable housing delivery and brownfield development in contributing to regeneration, and details of supporting infrastructure required, could also be drawn upon further.

#### GLA response

The GLA clarified that further detail surrounding supporting infrastructure, inclusive access, brownfield development and regeneration benefits were provided in other sections of the Plan.

The policy was however amended to reference the quality of housing and a reference to Empty Dwelling Management Orders to bring long-term vacant stock back into use as affordable housing was added. Minor amendments and clarifications were added to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 79: H11 Ensuring the best use of stock

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Medium Term						+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Long Term						+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Direct / Indirect						D	D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	D	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	T/P	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	L/ GL	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	+	+	+/	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	+	+	+/	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	+	++	+	+/	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I	I	D	D	I/D	D	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.12 H12 Housing type mix

#### Policy description

This policy supports a flexible approach to determining the appropriate mix of unit types, in relation to the number of bedrooms for a development scheme. The appropriate housing mix is based on a number of factors including housing needed identified as part of the Strategic Housing Market Assessment (SHMA), the need to deliver mixed and inclusive neighbourhoods, along with exploring opportunities to optimise housing potential. Generally, schemes consisting of solely one-person or one-bedroom units should not be permitted.

The policy reinforces the need for local authorities to have an understanding of housing needs in their area required to meet identified existing shortfalls, including the number of bedrooms of affordable homes. This information should also be used to inform local guidance on the mix of affordable and social housing units expected to be delivered as part of new developments.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support the provision of a range of housing types to deliver mixed and inclusive neighbourhoods, and support a balanced housing market. There is significant emphasis placed on the provision of well-designed family units, which will help respond to market shortfalls and challenges surrounding overcrowding. This also includes provision for specialist older persons' accommodation, to meet the needs of lesser mobile residents, and those with cognitive or sensory impairments, and also to help increase the availability of family housing.

The policy supports greater clarity for developers regarding the unit size mix for affordable housing, and the associated cost implications of the overall requirements. Increased developer certainty could help overcome barriers to affordable housing provision, and help to account for costs early in the development process. This will encourage a higher quality, and more targeted approach to delivery.

##### Cumulative

This policy aligns with policies H11 Ensuring the best use of stock and SD10 Strategic and local regeneration which support cost effective solutions to meeting housing supply requirements.

##### Recommendations

It was recommended that the policy could provide further detail on the data and assumptions used to determine the housing mix. It was also recommended that further detail could be provided on the quality of design, impacts on townscape and options for inclusive access as part of new developments.

#### GLA response

No changes were made to the draft policy, although minor amendments were made to the supporting text. The GLA advised that the London SHMA and any local assessment would inform housing mix. The GLA also advised that issues such as design quality, inclusive design and access would be addressed by other Policies within the rest of the Plan.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 80: H12 Housing type mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	?/+		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						?	?/+		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						?	?/+		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	+	?	?	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	+	?	?	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	++	?	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	n/a	D	I	I/D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	n/a	n/a	L	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		I				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.13 H13 Build to rent

#### Policy description

This policy supports a more appropriate model for delivering and managing Build to Rent Schemes in London to help accelerate and manage delivery. This includes acknowledging that such schemes generate lower initial land values but can provide an attractive long term offer to institutional investors.

The policy sets out the criteria for Build to Rent schemes, including the requirement for at least 50 units, all units to be self-contained, longer tenancies made available, and the requirement for unified ownership and management of the development.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

A more positive approach to the Build to Rent sector can support a better contribution to the delivery of new homes. The policy supports a more transparent and secure rental system, which could help in making the rental market more standardised and accessible. There is significant emphasis on ensuring a high quality of rental accommodation through professional on-site management practices, and unified ownership. This could encourage greater certainty and security for tenants, and support inclusive and diverse communities through affordable renting options. This greater security, and overall improved quality in rental accommodation is particularly important in supporting the overall well-being of lower-income communities, families with children, and residents with existing health conditions.

The delivery of high quality and affordable rental options could have a number of economic benefits for London as whole. Such schemes could help to overcome barriers to employment, particularly for lower income communities, and maintain the city's attractiveness as a place to live and work. This could help to retain labour within the capital, and attract new skilled labour, contributing to London's overall economic competitiveness.

More specifically, this policy could support the needs and overall well-being of lower-income communities

##### Cumulative

This policy complements policies D4 Housing quality and standards and SD5 Offices, other strategic functions and residential development in CAZ which support housing provision within strategic economic locations. The implementation of build to rent will attract support affordable housing within in the CAZ.

##### Recommendations

It was recommended that further reference could be made to inclusive design measures, such as provision for adaptable and accessible units. This would help to ensure that rental opportunities could be accessed by lesser mobile communities, and those with 'invisible' disabilities. It was also recommended that further detail was provided on supporting infrastructure, such as open space, sustainable transport infrastructure and access to key social services. These features are particularly important in helping to mitigate adverse impacts associated with high density development.

It was noted that this policy supports the provision of affordable housing for low-income groups, but does not consider the wider issue of high rents across London. It was recommended this policy should clarify if more rental accommodation could help to drive down rental prices in London to help individuals on average incomes in the city. It was also recommended the policy should provide further

detail on the design of 'Build to Rent' developments, including the use of sustainable materials, the consideration of the surrounding townscape/cityscape, etc.

#### GLA response

The GLA clarified that Build to Rent development tends to be at the higher end of the rental spectrum and therefore it is unlikely to drive down rental costs. The GLA advised issues such supporting infrastructure, design and inclusive access were set out in other sections of the Plan.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 81: H13 Build to rent

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	?		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	?		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	?		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+/?	+/?	+/?	n/a	+	+	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+/?	+/?	+	n/a	+	+	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+/?	+/?	+	n/a	+	+	?	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I/D	I/D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a					n/a	n/a		+	n/a		n/a	n/a	n/a	n/a
Medium Term	+	+	+		+				n/a	n/a					n/a	n/a		+	n/a		n/a	n/a	n/a	n/a
Long Term	+	+	+		+				n/a	n/a					n/a	n/a		+	n/a		n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		I				n/a	n/a					n/a	n/a		I	n/a		n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a					n/a	n/a		T/P	n/a		n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a					n/a	n/a		L	n/a		n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.14 H14 Supported and specialised accommodation

#### Policy description

This policy supports the delivery, retention and refurbishment of supported and specialised housing. The design should satisfy the requirements of the specific use or group it is intended for, and should respond to an identified need. The policy includes accommodation provision for many members of society, including young people, disabled people, rough sleepers, victims of domestic abuse and other forms of violence, and people with mental health issues. This also extends to 'move on' and 're-ablement' facilities, for communities with specific accommodation requirements.

The policy supports local authorities in undertaking assessments of both short term and long term accommodation needs within their borough. Existing facilities should similarly be audited to identify any capacity surplus or deficits that could inform future accommodation provision or adaptation.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would result in a number of positive outcomes for communities whose needs extend beyond the conventional housing market. The targeted provision of specialist accommodation will enable residents to lead independent and dignified lives, and will encourage inclusive, mixed communities across London.

For people experiencing violence, homelessness and other challenging circumstances, specialist accommodation could improve overall health and wellbeing, by providing a safe and secure community setting. This is particularly important in supporting the needs of women, young people, and residents with a disability or existing health condition, and could help overcome discrimination and marginalisation. Targeted and appropriate housing could improve overall life chances for many vulnerable communities, improving access to key services and economic opportunities.

##### Cumulative

This policy complements policies S1 Developing London's social infrastructure and D6 Optimising housing density which support the provision of housing and social infrastructure to vulnerable groups and aim to reduce homelessness.

##### Recommendations

It was recommended that further reference could be made to accommodate the needs of 'invisible' disabilities, including options to support residents with cognitive and sensory impairments. The policy could also reference the quality and design of accommodation. This could include identifying supporting infrastructure to help connect new residential developments to key local services, such as open space, public transport and local amenities. It was also recommended further reference be provided on the affordability of specialist accommodation, particularly as many tenants may require affordable options. This would help cater to the needs of lower-income communities, and those in particularly vulnerable and complex situations.

#### GLA response

The GLA amended the policy to include a reference to other 'invisible' disabilities. The GLA advised that other policies within the Plan addressed the other recommendations. Other minor wording amendments were made to the definitions and terminology used.

#### Appraisal of finalised policy

No further appraisal required as no significant changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 82: H14 Supported and specialised accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Temporary / Permanent						I	I		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Direct / Indirect						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	?	?	+	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	+	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	?	++	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	D	I	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	P	T/P	T/P	T	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	n/a		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	I	I	n/a		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	T/P	T/P	n/a		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	n/a		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.3.15 H15 Specialist older people's housing

#### Policy description

This policy supports the appropriate provision for specialist older persons housing, which accurately reflects both local and strategic needs, and is in line with borough benchmarks. The policy will help promote the needs of older residents, ensuring affordable and accessible options across a range of housing types. Provision should be well-connected, with good access to social infrastructure, health care services and public transport.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy will support older people in leading independent and fulfilling lives. The policy places emphasis on the provision of a range of supporting infrastructure to encourage ease of mobility, including scooter parking, pick up and drop off facilities, and provision for ambulance access. The provision of high quality transport infrastructure will support independent living, and support access for visitors, care workers and residents alike.

The policy promotes affordable accommodation options, helping to encourage diverse and inclusive communities, and overcome barriers to accessing suitable provision. Moreover, the policy objective to ensure housing is accessible and well connected to social infrastructure will allow residents to live confidently in the knowledge they have expedient links if further healthcare provision becomes necessary.

The strong support for inclusive and accessible design, including the development of communal housing, nursing facilities and other hospice services, will allow residents to move freely, develop social networks and form integrated communities. These features are likely to improve health and wellbeing outcomes for older residents, and could play an important role in reducing isolation and loneliness. Similarly, the provision of secure, purpose-built housing with access routes to public transport, should help decrease concerns surrounding crime and anti-social behaviour, which can lead to elderly residents being reluctant to leave their homes.

##### Cumulative

This policy aligns with policies S2 Health and social care facilities, G4 Local green and open space and H12 Housing type mix which support local amenities to all Londoners which could create a more inclusive society and reduced level of poverty.

##### Recommendations

It was recommended that the policy could make further reference to the links between neighbourhoods, communities and services. This could be supported by appropriate lighting and legibility measures to help people manoeuvre the built environment and improve perceptions of safety. This is particularly important for lesser-mobile residents, and those with cognitive and sensory impairments. Further reference could be made to the types of infrastructure and service provision required to support the development of older people's accommodation. This could include health services, libraries, community centres, parks and gardens and other cultural and religious establishments. These facilities are particularly important for support older resident communities.

#### GLA response

In response to these recommendations, the GLA restructured and revised the policy and supporting text, including updating the indicative borough benchmarks. Supporting text was added to the policy specifying that specialist older person's housing developments should be located in areas which allow easy access to services by public transport and active travel modes. Reference was also made to supporting residents in being able to safely and easily move around the wider area, through high quality spaces, whilst enjoying good access to the wider city.

#### Appraisal of finalised policy

The amendments made have moved some descriptive text from the policy to supporting text. Some background information text has been removed however this has negligible change to the policy. Ongoing data gathering has resulted in alterations to the indicative borough benchmarks used to inform specialist housing needs, however, the policy objectives and effects of implementation remain the same as noted in the initial appraisal.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 83: H15 Specialist older people's housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	O		?	n/a	+	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						+	O		?	n/a	+	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						+	O		?	n/a	+	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Direct / Indirect						I	I/D		I/D	n/a	I/D	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	n/a	L/ GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	?	+	?	+/?	+	+/?	n/a	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	++	?	+	?	+/?	+	+/?	n/a	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	++	?	+	?	+/?	+	+/?	n/a	+/?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	D	I	D	I	I/D	I/D	I/D	n/a	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L/ GL	L	L/ GL	L	L	L	L	n/a	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		O					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
Medium Term	+	+	++		O					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
Long Term	+	+	++		O					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
Direct / Indirect	D	D	D		D					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P		T/P					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L	L	L/ GL		L					n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	
<b>CSIA</b>																								
Short Term				+						n/a														
Medium Term				+						n/a														
Long Term				+						n/a														
Direct / Indirect				D						n/a														
Temporary / Permanent				P						n/a														
Local / Greater London / Wider Region / Global				L						n/a														

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.16 H16 Gypsy and Traveller accommodation

#### Policy description

This policy supports boroughs in identifying permanent Gypsy and Traveller pitches, and putting measures in place to assess future needs. This includes both safeguarding current pitches and supporting the additional provision of secure sites. Gypsy and Traveller accommodation capacity should be protected by the boroughs in line with the requirements of the Equality Act 2010, and actively considered when reviewing new residential development proposals.

The policy also supports boroughs in preparing a needs assessment and encourages an audit to be undertaken of existing pitches and sites. There is a strong emphasis on monitoring and reviewing identified needs, to ensure balanced communities are effectively planned for throughout the Plan period.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would help to overcome barriers faced by Gypsy and Traveller communities in maintaining their values and traditional lifestyles. This will support a range of cultural needs by ensuring access to secure accommodation, underpinned by appropriate supporting infrastructure. Appropriately planning for Gypsy and Traveller communities can help to improve access to educational opportunities, employment and health services for these communities. The policy acknowledges the adverse physical and mental health impacts that can arise from unsuitable and low quality living environments. By seeking to improve the living conditions of Gypsy and Traveller communities, this policy is likely to help improve overall health and wellbeing. This in turn will encourage inclusive, balanced and cohesive communities across London, and help to overcome discrimination and marginalisation.

The policy also facilitates the refurbishment of existing pitches that are no longer 'fit for purpose'. This includes ensuring the provision of accessible and adaptable service blocks, which will improve the quality of accommodation, and overall wellbeing, of existing communities across London.

##### Cumulative

This policy would align with other policies promoting accessible housing for various groups within society. It would also help promote policies G4 Local green and open space by allowing Gypsies and Travellers designated pitches that would result in reduced use of green and open land.

##### Recommendations

It was recommended that further information could be provided on the linkages between new pitches and key service and employment opportunities. For example, it could include reference to affordable active travel networks or accessible public transport routes, particularly as appropriate transport connections can play a key role in overcoming severance and associated barriers to employment.

The policy could also reference supporting infrastructure needed to ensure safe access for Gypsy and Traveller communities. This could include sufficient lighting, transport interchange options throughout the day and night, and CCTV where appropriate.

#### GLA response

No changes were proposed to be made to the draft policy, although minor amendments were made to the policy and supporting text to highlight the link between ensuring that new sites are well-connected to social infrastructure, health care, education and public transport facilities,

The GLA also advised that further detail on social infrastructure, inclusive design are covered in other parts of the Plan. It was similarly noted that detailed pitch and site layout requirements are too detailed for a strategic plan.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed potential likely significant effects to designated sites. Potential linking impact pathways present include: Recreational pressure, Atmospheric pollution and Hydrological changes.

Table 84: H16 Gypsy and Traveller accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Medium Term						?	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Long Term						?	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Direct / Indirect						I	I/D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	?	+	?	+/?	+	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	+	?	+/?	+	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	?	+	?	+/?	+	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	I/D	D	I	I	I/D	n/a	I/D	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	T/P	P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L	L	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P	P	P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				-					n/a															
Medium Term				O					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.17 H17 Purpose built student accommodation

#### Policy description

This policy aims to ensure that local and strategic needs for purpose-built student accommodation are addressed across London. The student accommodation must either be operated directly by a higher education institution, or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions. Student accommodation will be brought forward in locations that are well integrated with the local transport network, to ensure sustainable access to services.

The policy supports that proposals secure at least 35% of developed accommodation as ‘affordable student accommodation’ as defined by the London Plan and associated guidance. Allocation of affordable student accommodation should be undertaken by the higher education institution which operates, or has the nomination right to operate, the development. The institution should allocate the rooms to students it considers most in need of the accommodation.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy will help to ensure London remains an attractive place to study, and reinforce its status as a centre of world-class educational institutions. High quality accommodation, including affordable options, will ensure student needs are adequately met. In particular, this will enhance opportunities for lower-income students by reducing the financial burdens associated with studying in London. Given the high number of students that come to study in London, student housing could indirectly contribute to keeping ordinary housing available. The policy is clear that it will not undermine the delivery of convention housing across the capital.

Where appropriate, student housing will form part of mixed-used regeneration and redevelopment schemes, which can drive a range of economic benefits, particularly as students can encourage a vibrant atmosphere. High numbers of students could provide significant footfall to local services, and could support the evening economy. There is emphasis on locating development proposals in well-connected areas, which could support active travel opportunities, and encourage sustainable development outcomes.

The policy also encourages the temporary use of accommodation during vacation periods for ancillary uses. This could help to support a range of uses such as conferences, summer courses and placements, and encourage efficient use of existing accommodation capacity.

##### Cumulative

This policy complements policies SD5 Offices, other strategic functions and residential development in CAZ and E11 Sector growth opportunities and spatial clusters which support mutual economic and housing benefits from new developments. This policy could conflict with policies H4 Meanwhile use and H9 Vacant building credit if developments are constructed whilst housing capacity still exists.

##### Recommendations

It was recommended that further information could be provided on inclusive access options, with specific consideration for ground floor flats reserved for less mobile persons and wheelchair users. It was also advised that information be provided in relation to explicit security measures, including safe travel options throughout the night. This is particularly important for higher risk groups such as women, LGBTQ communities, and religious and ethnic minority groups. Further reference could also be made as

to how potential noise impacts and disturbance associated with student accommodation can be mitigated. This could include design features, ensuring the location is not near to sensitive receptors such as care homes, religious institutions and schools.

#### GLA response

The GLA clarified that inclusive access would be covered by the building regulations. Further information on design is set out in Policy D1 and D3, and these issues apply to all development. The GLA advised that other policies within the Plan addressed the recommendation such as noise.

As a result, no major changes were made to the draft policy, although minor amendments were made to provide further clarity and improve readability.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 85: H17 Purpose built student accomodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+/?		+	+	+	+	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						+	+/?		+	+	+	+	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						+	+/?		+	+	+	+	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Direct / Indirect						I	I/D		I/D	I/D	I/D	I	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	L/ GL	L/ GL	L/ GL	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+/?	+/?	+/?	?	+	?	n/a	+/?	?	n/a	+/?	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	+/?	+/?	+/?	?	+	?	n/a	+/?	?	n/a	+/?	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	+/?	+/?	+/?	?	+	?	n/a	+/?	?	n/a	+/?	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	I	n/a	I/D	I/D	n/a	I/D	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	P	P	T/ P	n/a	P	P	n/a	P	n/a	n/a	T/ P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/ P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L	n/a	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+/?	+/?	+/?		+				+/O	n/a				O	n/a		+	n/a		n/a	n/a	n/a	n/a	?
Medium Term	+/?	+/?	+/?		+				+/O	n/a				O	n/a		+	n/a		n/a	n/a	n/a	n/a	?
Long Term	+/?	+/?	+/?		+				+/O	n/a				O	n/a		+	n/a		n/a	n/a	n/a	n/a	?
Direct / Indirect	I/D	I/D	I/D		I/D				D	n/a				I	n/a		I	n/a		n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P		T/P				P	n/a				T/ P	n/a		T/ P	n/a		n/a	n/a	n/a	n/a	T/ P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				L	n/a				L	n/a		L	n/a		n/a	n/a	n/a	n/a	L
<b>CSIA</b>																								
Short Term				n/a						n/a														
Medium Term				n/a						n/a														
Long Term				n/a						n/a														
Direct / Indirect				n/a						n/a														
Temporary / Permanent				n/a						n/a														
Local / Greater London / Wider Region / Global				n/a						n/a														

- Objectives**
1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  4. To contribute to safety and security and the perceptions of safety
  5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  8. To maximise accessibility for all in and around London
  9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  22. To conserve London's geodiversity and protect soils from development and over intensive use.
  23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.3.18 H18 Large-scale purpose-built shared living

#### Policy description

This policy supports large-scale, purpose-built shared living accommodation, where it meets an identified need. The policy supports the creation of mixed-used and inclusive neighbourhoods, and seeks to ensure proposals are located in well-connected areas. Shared accommodation will contribute to deliver conventional affordable housing. Private units within shared accommodation should have adequate functional living space, and be supported with communal facilities. Ongoing management and maintenance will be supported by a management plan to encourage a high quality of development.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy could play a role in meeting London's housing needs through the delivery of large-scale, purpose-built development. This includes off-site affordable housing contributions. The emphasis on high quality design and provision of community facilities could encourage social interactions, and integration with surrounding uses.

Shared accommodation can offer a secure, and cost-effective option for individuals living in the city, and can meet specific needs within the housing market. The delivery of this type of housing would occur in well-connected areas, which would contribute in improving access to services, facilities and wider opportunities for residents. This could also help to mitigate adverse impacts associated with high density developments, and could encourage sustainable land use patterns. Environmentally, this could have a number of indirect impacts on reducing car dependency and contributing to local air quality improvements, in some parts of London.

This policy should contribute in unlocking land for housing development therefore contributing positively to wider infrastructure objectives. It also supports the provision of facilities and amenities to support the needs of residents, and ensure easily available and accessible infrastructure. This includes the submission of a management plan as part of development proposals, to clearly set out security procedures within and around the development. This could help to improve security for higher risks groups, such as women, young people, LGBTQ communities, religious and ethnic minority groups.

##### Cumulative

This policy complements policies SD5 Offices, other strategic functions and residential development in CAZ and E11 Sector growth opportunities and spatial clusters which support mutual economic and housing benefits from new developments. This policy could conflict with policies H4 Meanwhile use and H9 Vacant building credit if developments are constructed whilst housing capacity still exists.

##### Recommendations

It was recommended that further information be provided on inclusive access, including adaptable units that can support the needs of lesser mobile residents, and for residents with 'invisible' disabilities. The policy is clear that shared living development could help meet local housing needs, if a range of criteria is met. It was recommended that further details could be provided on fully meeting the criteria and alternative options if these criteria are not met. This policy could also be more explicit about the financial benefits shared living.

It was also recommended that further details be provided on security measures, which could be particularly important for more vulnerable communities. Measures could include appropriate lighting, secure entrances and easily accessible transport options throughout the day and night.

#### GLA response

The GLA clarified that the policy criteria forms part of the Development Plan for individual boroughs, and will be delivered through the assessment of an application. The policy does not seek to set the rental level of these units. The provision of affordable housing is addressed through off site contribution. If the cost of the units is a key issue for granting planning permission the policy supporting text allows boroughs to use s106 agreements to ensure rental levels are maintained.

It was noted that reference to supporting facilities, inclusive access and design are covered in Policy D1 and D3, and therefore are not part of this policy. Overall, no changes were proposed to be made to the draft policy, although minor amendments were made to the supporting text.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 86: H18 Large-scale purpose-built shared living

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		?	+	+	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						+	+		?	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						+	+		?	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Direct / Indirect						I	I		I/D	I/D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L	L/ GL	L/ GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	?	+/?	+/?	n/a	+	+/?	n/a	+	n/a	n/a	?	n/a		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	?	+/?	+/?	n/a	+	+/?	n/a	+	n/a	n/a	?	n/a		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	?	+/?	+/?	n/a	+	+/?	n/a	+	n/a	n/a	?	n/a		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	n/a	I/D	I/D	I	n/a	I	I	n/a	I	n/a	n/a	I	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	T/ P	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	n/a	L	L	L/ GL	n/a	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a	L	n/a		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		+				+/O	n/a				O	n/a		?	n/a		O	n/a	n/a		n/a
Medium Term	+	+	+		+				+/O	n/a				+	n/a		?	n/a		O	n/a	n/a		n/a
Long Term	+	+	+		+				+/O	n/a				+	n/a		?	n/a		O	n/a	n/a		n/a
Direct / Indirect	D	D	I		D				D	n/a				D	n/a		D	n/a		D	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	P		P				P	n/a				T/P	n/a		P	n/a		T/P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		L	n/a		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I															
Temporary / Permanent				T/P					T/ P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.4 Social Infrastructure

### 9.4.1 S1 Developing London's social infrastructure

#### Policy description

The policy supports boroughs to produce development plans that provide high quality, inclusive social infrastructure, seeking to make best use of available land where there is local and strategic need. This should ensure new facilities are accessible by public transport, and provision is made for cycling and walking. It also supports the repurposing of redundant social infrastructure.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would ensure high density developments have a positive impact for residents by supporting the needs of the local community and delivering regenerative change. The policy supports redundant facilities being repurposed for voluntary and community groups who otherwise find it difficult to find suitable premises. This can improve access to community events which would increase community cohesion, reduce isolation and offer support, all of which can improve health and wellbeing. The use of redundant facilities would also contribute to reducing local crime by ensuring buildings are not left vacant and also provide community activities offering education and support.

The sharing of community facilities would ensure local groups, who often have small budgets, have affordable and appropriate space for their needs. The provision of educational facilities would ensure sufficient school places are provided for local children. This would reduce the need for young people to travel long distances to school, which can be a stressful and expensive experience. It would equally contribute to wider air quality improvements by reducing vehicle use.

The integration of public transport, cycling and walking infrastructure would ensure London's social infrastructure remains accessible, and improves wider connectivity across the capital. The use of redundant social infrastructure and integration of high density developments with transport ensures that available land is used appropriately and sustainably to maximise growth. This would facilitate further economic and employment growth across the city, which would have a profound impact on areas of deprivation, directly improving living standards and quality of living.

##### Cumulative

This policy complements policies G4 Local green and open space and T3 Transport capacity, connectivity and safeguarding which support the provision of public and active transport as well as green spaces to promote active lifestyles. The combination of policies could positively encourage social inclusion, and support a range of favourable health and wellbeing outcomes.

##### Recommendations

It was recommended that further information be provided about the management practises and inclusive design and access. This could include reference to affordable options, measures to accommodate the needs of religious and ethnic groups, and ensuring inclusive access for lesser mobile communities, and buggy users. It was suggested these measures were considered for both new infrastructure and the development of redundant infrastructure.

#### GLA response

Additional references to faith groups were made in the supporting text. A reference to alternative uses meeting the needs of the community was also included. The GLA advised that other policies in the Plan addressed issues such as inclusive communities, and inclusive design, Healthy Streets, and green infrastructure.

#### Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied. The overall effects of implementation of the policy would remain as identified in the initial assessment.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy promotes walking and cycling, which can potentially lead to air quality improvements through reduced reliance on motor vehicles.

Table 87: S1 Developing London’s social infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		+	n/a	+	O	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term						n/a	n/a		+	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term						n/a	n/a		+	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Direct / Indirect						n/a	n/a		I/D	n/a	I/D	D	D	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a
Temporary / Permanent						n/a	n/a		T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	P	n/a	T	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		L/ GL	n/a	L	L/ GL / W	L	L	n/a	L	n/a	n/a	n/a	L/ GL / W	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	O	n/a	n/a	+	+	?/+	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?
Medium Term	+	+	O	n/a	n/a	+	+	?/+	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?
Long Term	+	+	+	n/a	n/a	+	+	?/+	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect	D	D	I	n/a	n/a	D	I	I	n/a	n/a	D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	L	L	L	n/a	n/a	L	L	L	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		O
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		O
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		I/D	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				O					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.4.2 S2 Health and social care facilities

### Policy description

The policy supports the enhancement of existing and development of new health and social care facilities across London by encouraging boroughs to work with the NHS, Clinical Commissioning Groups and other boroughs and relevant organisations to develop best practise to address health and social needs.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would support the provision of accessible healthcare facilities benefiting those with mobility issues and/or long term health conditions. Increasing the capacity of health care facilities and considering closely where demand is, and what types of services are needed, would ensure these services are of a high quality and meet the needs of their patients. The consolidation of smaller GPs into larger sites can provide more services which benefit local communities, but careful consideration would be needed to ensure individuals are not left far from their closest GPs.

The requirement for all services to be accessible by bicycle and walking would contribute positively to the accessibility and connectivity with these services whilst facilitating active travel and healthier life styles. The reduction in the need to travel would also contribute positively to wider air quality improvements. The efficient use of existing infrastructure, such as the co-location of facilities or reconfiguration of existing facilities, would ensure that in the long-term, land is used in a more sustainable and appropriate way.

#### Cumulative

This policy aligns with policies S11 Improving air quality and G4 Local green and open space which support improvements to air quality and encourage more exercise and access to green and open spaces. The combination of policies could boost economic growth by reduced costs from physical and mental health treatments.

#### Recommendations

It was recommended that further information be provided regarding inclusive access, referencing management practises accommodating wheelchair and buggy users, those with sensory impairments and 'invisible' disabilities. This is particularly important for health related infrastructure, which should accommodate a range of complex needs. It was also advised that detail be provided regarding the types of facilities that might be expected to co-locate with health and social care facilities.

It was also recommended that the policy could provide reference to expected 'tipping points' in which residential development would require additional healthcare facilities.

### GLA response

The GLA advised that Policy S1 suggested examples of the types of facilities that might be expected to co-locate with health and social care facilities.

In relation to tipping points, the GLA explained the model for health care is not only complex but is based on different solutions based on local requirements. The policy therefore encourages LPAs to work with public health and CCGs to properly understand their needs.

In relation to the other recommendations, the GLA advised that other policies in the London Plan addressed issues of inclusive design in greater detail.

### Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied. The overall effects of implementation of the policy remains the same, however the promotion of physical activity would be an indirect, instead of direct, positive effect as the policy is explicitly focusing on the improvements to health facilities rather than improvements to Londoners' well-being.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 88: S2 Health and social care facilities

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	+	+	n/a	n/a	O	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Medium Term						+	n/a		n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Long Term						+	n/a		n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Direct / Indirect						D	n/a		n/a	I	I/D	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	I/D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	T	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+/?	+/?	+	n/a	n/a	+	+	O	n/a	n/a	+	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+/?	+/?	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+/?	+/?	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	n/a	D	D	I	n/a	n/a	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L/GL	n/a	n/a	L/GL	L/GL	L/GL	n/a	n/a	L	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				O	n/a		n/a	n/a		?	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				+	n/a		n/a	n/a		?	n/a	n/a		n/a
Long Term	+	+	+		n/a				n/a	n/a				+	n/a		n/a	n/a		?	n/a	n/a		n/a
Direct / Indirect	D	D	I/D		n/a				n/a	n/a				I	n/a		n/a	n/a		I	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				n/a	n/a				L	n/a		n/a	n/a		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				O					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.4.3 S3 Education and children facilities

#### Policy description

The policy supports improved provisions of good quality childcare and educational facilities in an effort to meet demand and offer choice across London. The policy encourages development proposals to incorporate suitable childcare provision where necessary and informs boroughs on the requirements that must be met to ensure good quality childcare and education facilities.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would ensure the improvement and management of all types of education facilities from nursery schools to further education, which are accessible and affordable. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, residents with a disability or existing health conditions, and Gypsy and Traveller communities.

Education is closely associated with positive health and wellbeing and can also contribute to a reduction in anti-social behaviour and criminal activity. The placement of schools and playgrounds away from busy roads and the investment in green space for sport and recreation would ensure reduce child exposure to high levels of air and noise pollution, providing further health benefits.

The promotion of public transport, cycling infrastructure and footpaths supports the concept of healthy routes to school. Such routes encourage children to feel safe walking or cycling to school, allowing them to be physically active from a young age. These healthy routes are generally on quieter roads to keep children away from excessive air and noise pollution.

The delivery of educational and children facilities would be developed in a sustainable manner, promoting relocation, reconfiguring or colocation of facilities to ensure the best use of land and the delivery of services in appropriate, accessible locations. Wider infrastructure improvements, such as public transport, cycling and walking infrastructure, would benefit the whole community, not just educational facilities. By taking into consideration future educational need, this policy also supports future housing development by ensuring the supporting infrastructure is in place.

Implementation of the policy will be highly beneficial to the economic productivity of London as high quality education provides a skilled workforce for future employment which underpins the viability of the current and future economy. Specifically, enhancements to Higher Education (HE) and Further Education (FE) facilities strengthen London's global position for employment and economic quality and attract young people nationally and internationally. Major international companies recruit favourably from London universities and HE and FE facilities also serve as major employers in their own right.

##### Cumulative

This policy complements policies S1 Developing London's social infrastructure, H1 Increasing housing supply and E4 Land for industry, logistics and services to support London's economic function which support the provision of education and childcare facilities with surrounding essential infrastructure.

##### Recommendations

It was recommended that further information be provided in relation to the supporting infrastructure to improve safety around school environments, particularly for alternative uses outside of schools. This could include sufficient lighting and appropriate management practises for 'healthy routes', which could

improve safety for higher risk groups. Further reference was requested to ensure all communities would confidently engage with the educational opportunities available to them. This could include referencing how faith-based educational requirements could be accommodated.

It was also recommended that stronger links be made to promoting education facilities as spaces suitable for ecological design and innovation (such as green roofs, raised beds and compost areas) that enhance ecological value and connect the Green Space Network.

Additionally, it was suggested that further detail be provided on the transition from education into work, particularly for deprived, low-skilled or minority groups

#### GLA response

The supporting text was amended to include a reference to healthy and safe routes to schools as well as providing greater clarity on how the policy should be application. The GLA advised that the policy already references SEN requirements and ensures that schools are accessible, and that whilst faith-based schools are covered by the policy generally, they are not inclusive for all.

The GLA amended in the supporting text to include a reference to the inclusion of greenery and the recognition of the health and educational benefits these features can provide.

The GLA clarified that Policy already notes that FE can 'assist with Londoners' progression into, and through employment' and advised that it was more appropriate for the Mayor's Economic Strategy to address these issues.

#### Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied. The overall effects of implementation of the policy would remain as identified in the initial assessment.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 89: S3 Education and children facilities

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	+		+	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Medium Term						O	+		+	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Long Term						O	+		+	++	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Direct / Indirect						I	I/D		I/D	I	I	I	I/D	I/D	n/a	I/D	n/a	n/a	n/a	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	T	n/a	T/P
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	L/ GL /W	L/ GL /W	L/ GL /W	L/ GL	L	n/a	L	n/a	n/a	n/a	L	n/a	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	O	+	n/a	n/a	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	+	+	++	+	n/a	n/a	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	++	++	++	++	n/a	n/a	+	+	+	++	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	n/a	n/a	I	I	I	I	I	I	n/a	n/a	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	n/a
Direct / Indirect	P	P	T/P	P	n/a	n/a	T/P	T/P	P	P	P	P	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	n/a	n/a	L	L	L	L/ GL /W	L/ GL /W	L/ GL /W	n/a	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?
Medium Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?
Long Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?
Direct / Indirect	D	D	D		n/a				I/D	n/a				I/D	n/a		n/a	n/a		I	n/a	n/a		I
Temporary / Permanent	P	P	P		n/a				T/P	n/a				T/P	n/a		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				O					+															
Medium Term				O					+															
Long Term				O					+															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.4.4 S4 Play and informal recreation

### Policy description

The policy supports the management and enhancement of play and informal recreation provision across London. It seeks to improve access to areas of stimulating, recreational environments where children and young people can be safely and independently mobile.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy promotes a culture of equality and fairness through the provision of accessible and inclusive play spaces. Accessibility can help encourage social integration and provide play opportunities for less mobile individuals and those living within dense urban areas. A barrier free environment would encourage independence and healthy living from a young age and support the development of strong social connections. This would also have a positive effect on the reduction of anti-social behaviour. Schools and other facilities are encouraged to allow community access out of hours, increasing social unity, general health and wellbeing and improved links with educational facilities.

The adoption and continuation of an active and healthy lifestyle into the future, with routine bouts of physical activity, will greatly improve young people's life expectancy and healthy life expectancy. The equal provision of play spaces across London would also have a highly positive effect to help reduce the health problems of deprived areas.

The delivery of physical infrastructure and housing would be enhanced by the provision of community play-space. The benchmark approach outlined in the policy ensures new developments would have sufficient access to local play facilities. Traffic on roads and pedestrian paths could also be reduced as increased provision across London will reduce travel times to play areas. The policy intends for children to move freely on 'safe streets' around play areas, improving wider connectivity and accessibility.

Consultation with children and young persons would ensure the changing needs of young people are addressed and ensure the recreation provided is stimulating. This ensures the needs and wants of the local community are taken into consideration, resulting in improved public perception of the local spaces and the fostering of strong social cohesion and a sense of pride among the local community in the space they have helped create.

The policy may have some positive impact on the enhancement of character of green spaces. The intention is to provide a space that is aesthetically pleasing not to develop biodiversity. However, the development of small inner-city provision/parks would likely include green aspects to improve the attractiveness of these local spaces. The wide distribution of play spaces would help reduce excessive travel, assisting the reduction of London's CO<sub>2</sub> emissions. In the long term, tree plantations included within play area design could contribute to reducing flood risks.

Implementation would be unlikely to reduce noise impacts, rather play areas increase ambient noise conditions during peak hours. This is dependent on the type of space and its popularity.

#### Cumulative

This policy complements policies S3 Education and childcare facilities and T2 Healthy streets which support an active learning environment. The policy may potentially come into conflict with D13 Noise which supports noise reduction and quieter residential space.

### Recommendations

It was recommended that further information be provided on inclusive access for different community groups in an effort to encourage social integration and reduce anti-social behaviour. It was also suggested that further reference was made to inclusive design, such as provision for wheelchair and buggy users, and to accommodate a range of sensory and 'invisible' disabilities.

Clarity was asked for in relation to the number of new parks/play areas the policy intended to generate and further detail was requested regarding the composition of play areas. Moreover, consideration to benefit biodiversity and provide educational opportunities was asked for in relation to the interlinking spaces and play area design.

### GLA response

The GLA clarified the number and distribution of new parks / play areas and their design was a borough matter.

The policy was amended to include the following references, 'the incorporation of trees and other greenery, 'integrating natural environments into play provision is encouraged, acknowledging the benefits to learning and to help to support a green infrastructure network across the city 'accessible provision', and in terms of safety "away from heavily trafficked road'.

The GLA also advised that other policies on Design, Health and Green Infrastructure provided further details

The GLA also clarified that the policy encourages the consultation with different age groups to help inform their design which will help to encourage social integration and reduce anti-social behaviour as the play / informal space is more likely to meet local needs.

### Appraisal of finalised policy

The amendments made to the policy provide further clarity on how the policy should be applied, however the overall effect of implementation would remain the same as noted in the initial appraisal.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 90: S4 Play and informal activities

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	n/a	+	n/a	n/a	+	O	+	n/a	n/a	O	+	n/a	+	n/a	?
Medium Term						+	+		+	n/a	+	n/a	n/a	+	O	+	n/a	n/a	+	+	n/a	+	n/a	?
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	+	n/a	+	n/a	?
Direct / Indirect						I/D	I/D		I/D	n/a	I/D	n/a	n/a	I/D	I/D	I/D	n/a	n/a	I/D	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	T	n/a	T/P
Local / Greater London / Wider Region / Global						L	L		L	n/a	L	n/a	n/a	L	L	L	n/a	n/a	L	L	n/a	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Medium Term	+	+	++	+	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Long Term	++	++	++	++	n/a	+	++	++	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect	D	D	D	D	n/a	D	D	D	D	n/a	D	n/a	n/a	D	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	P	n/a	P	P	P	P	n/a	P	n/a	n/a	P	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	L	L	L	L	n/a	L	n/a	n/a	L	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Medium Term	++	++	++		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Long Term	++	++	++		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Direct / Indirect	D	D	D		n/a				D	n/a				I	n/a		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		T
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				?					+															
Medium Term				?					+															
Long Term				?					+															
Direct / Indirect				I					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.4.5 S5 Sports and recreation

### Policy description

The policy supports the maintenance and enhancement of accessible, good quality sporting and recreation facilities across the capital, in an effort to deliver social, and mental and physical health benefits to all Londoners.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The provision and enhancement of sports and recreational facilities across London would contribute significantly to wider health improvements by promoting increased physical activities. The policy would support the delivery of a wide range of sports and activities to suits the interests and lifestyles of Londoners. Inequalities around access to these services would also be addressed through the application of Sport England Standards, in an effort to provide equality and reduce health problems in deprived areas. Active lifestyles will have a profound positive effect on life expectancy and can provide contribute to improved mental health and wellbeing.

The congregation of people at formal and informal facilities, such as taking part in team sports or participating in the same activity, would contribute to improved social connectivity and integration. This can help foster a culture of equality and respect for others and reduce anti-social behaviour. Sports and recreational facilities could also support or host cultural events to drive further community cohesion and integration.

Ensuring sporting facilities are appropriately connected to pedestrian and cycling networks would encourage people to continue physical activity outside of a formal settings and also reduce traffic congestion. This would offer benefits to the wider community, not just users of these facilities. By considering the appropriate location and connectivity of these facilities, this policy also supports future housing development by ensuring the supporting infrastructure is already place.

Improved connectivity through new walking and cycling networks would decrease car use thereby improving air quality and help to reduce CO<sub>2</sub> emissions. The policy also identifies the need to manage lighting appropriately to ensure there is no harm on the local community and biodiversity. The use of playing fields could also provide larger, green spaces across the city, increasing natural capital and greenery across London. However, any biodiversity would need to be protected in these areas and a balance assured between recreational use and wildlife.

#### Cumulative

This policy complements policies S1 Developing London's social infrastructure, H1 Increasing housing supply and E4 Land for industry, logistics and services to support London's economic function which cumulatively support a community which encourages social integration, an active lifestyle and positive wellbeing.

#### Recommendations

It was recommended that further information be provided in relation to the type of facilities promoted by the policy and detail about the inclusive design features, particularly in terms of accommodating the needs of wheelchair and buggy users, along with measures to support specific religious and cultural needs.

It was advised greater emphasis be given to the cultural role sports venues could play and how the wider local communities could participate, particular detail was requested regarding the affordability surrounding sports and events that would be a benefit to low-income residents.

It was requested that clarification be provided detailing what constitutes 'demonstrable harm' to local community and biodiversity in relation to management of outside facilities lighting. It was also asked whether lighting would be extended to walk/cycle networks.

### GLA response

The GLA amended the supporting text to provide clarity around outdoor lighting of facilities, however they further advised that advised that other policies in the Plan addressed issues of Inclusive Design, Healthy Streets, and Biodiversity. The GLA further advised that the other recommendations such as affordability of venues were beyond the scope of the London Plan.

### Appraisal of finalised policy

The amendments made to the policy provide further clarity on how the policy should be applied however the overall effect of implementation of the policy would remain the same as noted in the initial appraisal.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy promotes walking and cycling, which can potentially lead to air quality improvements through reduced reliance on motor vehicles. Sports and recreational facilities also have the potential to divert recreational pressure away from a sensitive European designated site.

Table 91: S5 Sports and recreation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	O		O	n/a	+	n/a	?/+	O	n/a	O	n/a	n/a	+	O	n/a	+	n/a	?
Medium Term						+	+		+	n/a	+	n/a	?/+	+	n/a	+	n/a	n/a	+	O	n/a	+	n/a	?
Long Term						+	+		+	n/a	+	n/a	?/+	+	n/a	+	n/a	n/a	+	O	n/a	+	n/a	?
Direct / Indirect						I/D	I		I	n/a	I/D	n/a	I	I	n/a	I	n/a	n/a	I	I	n/a	I/D	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	T/P	P	n/a	T	n/a	T/P
Local / Greater London / Wider Region / Global						L	L/ GL		L/ GL	n/a	L/ GL	n/a	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a	L/ GL	L	n/a	L	n/a	G/ GL
<b>EQIA</b>																								
Short Term	+	+	+	?	n/a	+	?	+	O	n/a	+	n/a	?/+	O	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	n/a	+	?	+	+	n/a	+	n/a	?/+	+	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	?	n/a	+	?	+	+	n/a	+	n/a	?/+	+	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	I	n/a	D	I	I/D	I	n/a	I/D	n/a	I	I	n/a		n/a	I	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	n/a		n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L/ GL	n/a	L/ GL	L/ GL	L	L/ GL	n/a	L/ GL	n/a	L/ GL	L/ GL	n/a		n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				O	n/a				O	n/a		n/a	n/a		O	n/a	n/a		n/a
Medium Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		O	n/a	n/a		n/a
Long Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		O	n/a	n/a		n/a
Direct / Indirect	D	D	D		n/a				I	n/a				I	n/a		n/a	n/a		I	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		n/a				L/ GL	n/a				L/ GL	n/a		n/a	n/a		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				?					O															
Medium Term				?					+															
Long Term				?					+															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.4.6 S6 Public toilets

### Policy description

This policy supports the provision of free public toilets that are accessible and appropriate for disabled persons and families with young children in retail outlets, leisure facilities and other large public spaces across London.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would promote equality and acceptance as it ensures toilets will have inclusive access and be of a design which caters for range of needs. This is particularly important for lesser mobile communities, older residents, those with specific gender and cultural needs, pregnant women and families with babies and young children. Moreover, the provision of free facilities will improve access and availability for low-income residents. A range of toilets will be constructed including unisex disabled persons toilets, Changing Places toilets that requires a carer, separate baby changing facilities and expanded cubicles for the elderly and those with limited mobility and may require additional space. Furthermore, in an effort to ensure greater social inclusive and foster a greater sense of tolerance, gender neutral toilets will be considered. This could play an important role in overcoming discrimination, and accommodating the needs of all residents and visitors.

While the creation of 24 hour toilet services contributes to the supporting infrastructure of London night-time economy there is a risk of crime and anti-social behaviours occurring as toilets are often associated with surveillance and security management. Facilities will remain open on open public spaces 'during opening hours', if open hours are after dark toilets may indirectly facilitate crime and anti-social behaviour if the proper measures are not considered as is in case of the draft policy.

Public toilets built in recreation spaces and other open public spaces will allow residents and visitors to move around London confidently. This will indirectly encourage longer stays in these spaces, thereby increasing the time people might confidently carry out exercise and physical activities.

#### Cumulative

This policy aligns with policy G4 Local green and open space as both policies support local amenities which could improve local health and wellbeing.

#### Recommendations

It was recommended that further information be provided in relation to the '10 minute walking' distance to the nearest toilet facilities as this may not be considered accessible for people with disabilities and mobility issues, and therefore may take longer to reach facilities.

It was recommended that consideration be given to the positioning of toilets in sports grounds/open spaces and what form the necessary surveillance and maintenance measures would take.

### GLA response

Amendments were made to the policy including additional text covering issues of ongoing maintenance and surveillance and the removal of the '10 minute walking' distance measure. Other editorial changes were made to improve clarity and readability.

### Appraisal of finalised policy

Amendments made to the policy provide clarity on application of the policy however, the overall effects of implementation will remain the same as noted in the initial appraisal with the exception of surveillance issues. The supporting text now clarifies the importance of improved security and safety measures. The result is a neutral to positive effect as the details of security measures are to be discerned later in the planning stage. Furthermore, security measures are only considered at the entrance therefore criminal activity could still take place inside toilet facilities, likely after dark.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 92: S6 Public toliets

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	++	++	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	+	n/a	n/a	n/a	n/a	++	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	D	n/a	n/a	n/a	n/a	D	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				O/+					n/a																
Medium Term				O/+					n/a																
Long Term				O/+					n/a																
Direct / Indirect				I					n/a																
Temporary / Permanent				T/P					n/a																
Local / Greater London / Wider Region / Global				L					n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.4.7 S7 Burial space

### Policy description

The policy supports the re-use of burial space and the protection of cemeteries. It encourages boroughs to ensure the different burial provisions and needs of all communities in London are recognised when preparing Development Plans for new cemeteries. Moreover the policy aims to foster cross-borough relationships to develop cemeteries for local communities where space is a premium in an effort to curb burials in outer London and beyond that would otherwise result in access and cost issues for families, which has a disproportionate effect on London's poorest.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy help to support social equality among Londoners as it acknowledges the different burial needs of faith-based communities. Moreover, promotion of cemeteries can have a positive effect on mental well-being as burial grounds offer quiet areas for contemplation. In order to facilitate equality the policy must strongly adhere to total parity in understanding of faith/religious requirements, any imbalance and/or preference given to certain to religious groups would result in potential animosity. Moreover, fostering cross-borough cooperation would increase the availability of burial space within local and surrounding areas. This would help to improve accessibility for those with limited mobility or poor access to public transport.

This policy would support London's wider natural capital as burial grounds provide relatively undisturbed areas where particular fauna and flora can flourish, although the re-use of burial grounds could cause disturbances to existing biodiversity. Protection of existing cemeteries has a positive effect on the conservation of London's historic environment, however this is conflicted by the policy's other aspect, the re-use of burial space. Historic cemeteries may form part of registered parks and gardens and contain listed monuments.

#### Cumulative

This policy complements policies S1 Developing London's social infrastructure and H1 Increasing housing supply which support the provision of infrastructure as available infrastructure capacity, particularly housing development, should only be considered confidently following assessment of current burial deficits and projecting future needs.

#### Recommendations

Potential amendments to the policy were advised with respect to whether there were instances that burial sites were acceptable forms of development in London's Green Belt and MOL. It was also recommended that clarification was provided on the criteria/ restrictions for the re-use of burial grounds and creation of new cemeteries. It was also suggested that further information on inclusive access was provided, both in terms of travel to the burial ground, and accommodating the movement of buggies and wheelchairs within.

### GLA response

The GLA advised that use of green belt and MOL land as a cemetery is inappropriate under the NPPG.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because no locations are identified and there are no linking impact pathways present.

Table 93: S7 Burial Space

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	?	?	n/a	n/a	n/a	
Medium Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	+	?	n/a	n/a	n/a	
Long Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	+	?	n/a	n/a	n/a	
Direct / Indirect						D	D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I/D	D	D	n/a	n/a	n/a	
Temporary / Permanent						P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T	n/a	T/P	P	P	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global						L/GL	L		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL	L/GL	L/GL /W	n/a	n/a	n/a	
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Direct / Indirect	I/D	D	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL /W	L	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	L/GL /W	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	n/a		n/a				n/a	n/a				n/a	+		+	n/a		n/a	n/a	n/a		+
Medium Term	+	+	n/a		n/a				n/a	n/a				n/a	+		+	n/a		n/a	n/a	n/a		+
Long Term	+	+	n/a		n/a				n/a	n/a				n/a	+		O	n/a		n/a	n/a	n/a		+
Direct / Indirect	I/D	I/D	n/a		n/a				n/a	n/a				n/a	I		I	n/a		n/a	n/a	n/a		I
Temporary / Permanent	T/P	T/P	n/a		n/a				n/a	n/a				n/a	T/P		T	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	n/a		n/a				n/a	n/a				n/a	L/GL		L/GL	n/a		n/a	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.5 Economy

### 9.5.1 E1 Offices

#### Policy description

The policy supports the provision of London's offices for a variety of different business sizes and to ensure that London maintains its nationally and internationally significant agglomerations. Development proposals should sustain and enhance the agglomerations of the Central Activities Zone, Northern Isle of Dogs, Kensington & Chelsea, Tech City and the Royal Docks Enterprise Zones.

The policy promotes the maintenance of offices in existing clusters and local locations and encourages boroughs to ensure that agglomerations are not undermined by office to residential permitted development rights. However, where surplus office space exists the redevelopment and change of use to other uses including housing should be supported.

In addition, the policy states that areas with strategic capacity should be supported and the need for lower cost and affordable workspace should also be taken into account.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The policy would have positive effects on London's economic competitiveness and employment. The policy supports the protection, renewal and enhancement of London's office stock, providing the necessary infrastructure to underpin economic vitality and job creation. Through support for a diverse range of office sizes and types, the policy supports both established business, as well as emerging industries through a requirement for development proposals to consider the need for affordable business space.

Implementation would result in positive effects over the long and medium-term for equality and social integration through the provision of high quality office stock and the acknowledgment of the need for lower cost and affordable spaces. The use of Article 4 Directions may limit the provision of housing in instances where a viable office is protected. However it also enables redundant office sites to be redeveloped at higher densities and for a mix of uses. This could include both market and affordable housing, whereas conversions through permitted development are not required to provide any affordable housing.

The policy would have positive effects on objectives for sustainable land use through its support of the renewal and modernisation of office spaces across the capital, which could have regenerative impacts. It also supports significant new provision in selected locations across the capital, supported by sustainable transport infrastructure. The policy promotes the development of the London office market alongside public transport enhancement, which supports enhanced connectivity through more sustainable forms of transport.

##### Cumulative

This policy complements policies E11 Sector growth opportunities and spatial clusters and SD1 Opportunity Areas which support the growth of local, regional, national and international businesses within opportunity areas. The combination of policies could benefit local economic growth by increased number of business leases.

#### Recommendations

It was recommended that the policy should expand its scope to include healthy workforces as a key initiative. The London Healthy Workplace Charter is an example of a mayoral scheme which helps to improve the health and well-being of employees. Encouraging good health and wellbeing can save a significant amount of money for companies.

The policy provides some spatial references for the location of significant new office provision; however further reference could be made to how these opportunities can be accessed by different people across London, for example communities in other parts of the city or disadvantaged communities. Further reference could also have been included on opportunities for overcoming severance and access barriers for areas not anticipated to receive new office development.

The policy maintains a focus upon the quantity, type and location of new and existing office development; however there is a lesser focus upon the design of offices and their successful integration within surrounding communities. The policy could therefore expand upon the expectations of office development from a design and quality perspective, and could benefit from referencing other design related policies within the London Plan.

#### GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance. The specific locations of national and internationally significant agglomerations is defined along with new locations in the west and south. Other spatial policies, such as the Opportunity Areas and growth corridors, set out those areas where there will be significant investment in new office development alongside transport infrastructure, improving accessibility across London. The work of the London Health Board and other Mayoral initiatives will continue to support the Healthy Workplace Charter.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy as it encourages locations of office development that can capitalise on public transport connectivity, this having the potential to reduce atmospheric pollution.

Table 94: E1 Offices

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	?			+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	O	n/a
Medium Term						+	?			+	++	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	n/a
Long Term						+	?			+	++	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	n/a
Temporary / Permanent						I	I			I/D	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	D	n/a
Direct / Indirect						T/P	T/P			T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL			L/ GL /W	L/ GL /W	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L/ GL	n/a
<b>EQIA</b>																									
Short Term	?	?	n/a	n/a	O	O	O	n/a	O	?	+	O	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	n/a	n/a	O	O	O	n/a	O	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	n/a	n/a	+	+	+	n/a	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Temporary / Permanent	I	I	n/a	n/a	I	I	I	n/a	I/D	I/D	I	I	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Direct / Indirect	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	n/a	n/a	L/ GL /W	L/ GL /W	L/ GL /W	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
<b>HIA</b>																									
Short Term	n/a	n/a	n/a		?				n/a	?				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a		?				n/a	?				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	n/a		?				n/a	?				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a		I				n/a	D				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a		T				n/a	T/P				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/ GL				n/a	L/ GL				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a						?															
Medium Term				n/a						?															
Long Term				n/a						?															
Temporary / Permanent				n/a						I															
Direct / Indirect				n/a						T/P															
Local / Greater London / Wider Region / Global				n/a						L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.5.2 E2 Low cost business space

### Policy description

The policy supports the protection of a range of low cost B1 business space to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.

In areas where there is an identified shortage of lower cost space the policy aims to prevent the loss of existing B1 space by requiring development proposals to demonstrate that there is no reasonable prospect of the site being used for business purposes; ensure that equivalent space is re-provided or demonstrate that suitable alternative accommodation is available in reasonable proximity.

The policy also encourages new B1 business development proposals for offices that are larger than 2,500sqm to consider the incorporation of a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The policy would have particularly positive effects on London's competitiveness and employment by promoting a diverse economy which is attractive to local, national and international markets. In particular, it strongly supports small businesses and start-ups who may not be able to afford, or require, traditional office space in prime locations. The policy may provide opportunities for flexible and diverse business spaces in more deprived parts of the city where traditional office space is currently lacking. This is particularly important in opening up start-up opportunities to lower-income communities, women and BAME groups. Ensuring that such development is affordable can also help to prevent displacement, particular for industries such as creative or cultural, which are often more vulnerable.

In minimising the loss of creative, flexible spaces and increasing affordable space for small businesses, the policy is likely to bring about cultural benefits associated with a successful creative sector. The policy is likely to help promote equality, inclusion and social integration through potential regenerative impacts, and reduce social exclusion and economic inequalities, through the prevention of displacement of lower cost, but locally important services.

The policy could also have positive effects in encouraging skills, training, business development and collaborative working, all of which can be ancillary benefits associated with low cost flexible work spaces. This is likely to benefit young people, the unemployed and lower income communities in particular, who may have more limited access to education and employment opportunities.

#### Cumulative

This policy complements policies SD5 Offices, other strategic functions and residential development in the CAZ and E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function which support development of offices for economic benefits.

#### Recommendations

It is recommended that further reference could be made to overcoming barriers to employment. This could include locating business space in locations with affordable and public transport options, and ensuring inclusive design and access measures.

In addition, it is recommended that the policy could more explicitly reference the potential links between affordable and flexible business space and educational outcomes, and the role that such spaces play in 'bridging' opportunities between education and work.

It is also recommended that the policy could further expand upon the benefits that low cost, diverse spaces can provide in terms of sustainable land use, notably their role in creating successful, vibrant and functional communities.

### GLA response

No changes were proposed to be made to the draft policy. The GLA advised that inclusive design measures are set out in other policies in the Plan. Due to the Town Centres First approach set out in Chapter 2, B1 business space including affordable workspace is likely to be focussed in locations that are well-connected by public transport.

The GLA advised that E11 addressed issues of skills and that the Mayor's Economic Strategy addressed issues of transition from education to work.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 95: E2 Low cost business space

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	n/a		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	n/a		n/a	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						+	n/a		n/a	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						I	n/a		n/a	D	I/D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						P	n/a		n/a	P	T/P	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	L/ GL	L/ GL	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	n/a	n/a	n/a	+	n/a	?	?	+	+	O	O	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	+	n/a	?	?	++	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	n/a	n/a	n/a	+	n/a	+	+	++	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	n/a	n/a	n/a	I	n/a	I/D	I/D	D	I/D	D	D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	P	n/a	T/P	T/P	P	T/P	P	P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	n/a	L	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Direct / Indirect				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.5.3 E3 Affordable workspace

#### Policy description

The policy supports planning obligations that may be used to secure affordable workspace at rents maintained below the market rate for specific social, cultural or economic development purposes, whilst having regard to the viability of development.

The policy supports the need for affordable workspace particularly where there is existing affordable workspace on-site and in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises. It also states that consideration should be given to locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business uses which contribute to the character of an area.

The policy encourages developers to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently. Finally, the policy states that affordable workspace elements of a scheme should be operational prior to residential elements being occupied.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The policy encourages social, cultural and economic sectors that may not otherwise flourish. This includes dedicated workspace to support disadvantaged groups, educational schemes, charities and social enterprises. As these spaces play a valuable role in local communities, and are particularly important for low-income and less mobile communities who may not otherwise have access to such opportunities, the policy is likely to bring about benefits in terms of equality, inclusion and social integration. The policy also supports regeneration opportunities, which can help residents to play an active role in shaping their local area. Moreover, the requirement for affordable workspaces to be operational prior to residential occupation in mixed-use schemes will also serve to create and enhance local vitality and vibrancy by providing new communities with immediate access to employment opportunities and services.

In supporting affordable spaces for social enterprises and companies helping disadvantaged groups, the policy may have wider benefits in terms of reducing health inequalities, particularly in deprived communities. Support for connections to educational establishments could help to support transition services from school / unemployment to employment, and promote higher education and skill attainment. This in turn is a driver for wider socio-economic benefits such as increased employment and improved health and wellbeing outcomes.

The policy strongly supports London's productivity and competitiveness through its support of a diverse range of enterprises such as SMEs and start-ups. The provision of local, affordable business opportunities within more deprived parts of the city could also help to overcome both actual and perceived barriers to access to employment, particularly if provision is made to support sustainable transport links with affordable workspaces.

##### Cumulative

This policy aligns with policies E11 Sector growth opportunities and spatial clusters and D7 Public realm which support access to employment and a diversity of enterprises. The combination of policies could positively affect the economy by increasing resilience from global market change and increasing local spending in small businesses.

#### Recommendations

It is recommended that further reference could be made to inclusive design and management practices of these spaces. This would help to ensure that lesser mobile communities, and those with a range of physical and sensory impairments, could participate in economic opportunities surrounding affordable workspace provision and use.

The policy addresses some barriers to employment, such as affordable options for start-ups, however it is recommended that this could be elaborated.

#### GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance. The GLA advised that other policies in the Plan such as inclusive design addressed some of the recommendations. The GLA also advised the management of these spaces is more a leasehold concern.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 96: E3 Affordable workspace

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	n/a		n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	n/a		n/a	++	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						+	n/a		n/a	++	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						D	n/a		n/a	D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						T/P	n/a		n/a	P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	L	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	n/a	n/a	n/a	+	+	+	O	+	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	+	+	+	+	++	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	n/a	n/a	n/a	++	++	+	+	++	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	n/a	n/a	n/a	D	D	D	D	D	I	I/D	I/D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Direct / Indirect				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.5.4 E4 Land for industry, logistics and services to support London's economic function

#### Policy description

The policy aims to maintain a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions. The retention and provision of industrial capacity across Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites should be planned, monitored and managed. The policy also provides protection against the loss of industrial land through permitted development rights.

The policy also aims to prioritise the retention and provision of additional industrial capacity in locations that are accessible, support logistics and provide capacity for micro, small and medium sized enterprises. The policy states that any release of industrial capacity should be focused in locations with the highest public transport accessibility and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The policy would have positive effects on economic competitiveness and employment by supporting and protecting strategic industrial locations and other industrial sites. As many of the businesses which operate in industrial locations are likely to be SMEs, the policy will help to protect these kinds of businesses, while also supporting larger and well established industrial businesses, resulting in a diverse industrial offer for London.

Through the intensification of industrial uses in appropriate locations, the policy supports mixed-use functions, including residential development, and supports the efficient use of land by directing industry to areas with appropriate transport access and amenities. These features could play a role in improving connectivity and encouraging regeneration, which could bring about further benefits for existing local communities. Such benefits may be especially felt by lower-income and less mobile communities.

In supporting a range of industrial and logistics uses, the policy contributes towards a diverse array of employment opportunities. This could help to encourage further training and skills across a number of industrial sectors, improving access to employment and the associated benefits that this brings in turn.

The policy supports industrial businesses, which are sometimes associated with higher emissions and which could potentially have negative effects on climate change, pollution and air quality. However, by retaining industrial and distribution functions within London, the policy will seek to mitigate displacement of these uses outside London; such displacement could exacerbate pollution and congestion due to the additional demand for freight transport that this would cause.

##### Cumulative

This policy complements policies E1 Offices, SD4 The Central Activities Zone (CAZ) and SD1 Opportunity Areas which seek to enhance wider economic growth across London. However, it may conflict with environmental policies which aim to improve air quality and reduce pollution, such as, SI1 Improving air quality and D13 Noise.

##### Recommendations

It is recommended that the policy could provide further detail on how barriers to training and employment at industrial sites could be overcome, for example affordable housing in appropriate

locations and access to training and skills. The policy could more explicitly reference regeneration opportunities related to industrial uses and the wider benefits that this would bring.

It is also recommended that further detail is provided on the relationship between industrial land and possible adverse noise and air quality impacts, and how design can be used as a tool to mitigate against these factors.

#### GLA response

The following policies that previously formed a section of this policy have been separated out in to these policies:

- E5 Strategic Industrial locations (SIL);
- E6 Locally Significant Industrial sites; and
- E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

The GLA also advised that access to training and skills, and the development of affordable housing, are covered in specific Policies elsewhere in the Plan. Policies E5 and E7 emphasise the need to consider noise and other impacts when developing residential near to industrial areas or as part of intensification and co-location of industrial areas.

#### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy contains positive provision for sufficient access to public transport and local walk and cycle networks, thus helping to reduce atmospheric pollution from vehicle emissions.

Table 97: E4 Land for industry, logistics and services to support London's economic function

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		+	+	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	?	?
Medium Term						+	n/a		+	+	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	?	?
Long Term						+	n/a		+	++	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	?	?
Temporary / Permanent						I	n/a		D	D	D	n/a	n/a	D	D	D	n/a	n/a	n/a	n/a	n/a	I	I	D
Direct / Indirect						T/P	n/a		P	P	P	n/a	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	P
Local / Greater London / Wider Region / Global						L/GL	n/a		L	L/GL	L/GL	n/a	n/a	L	L	L	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	?	+	n/a	n/a	+	+	n/a	+	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Medium Term	n/a	n/a	n/a	n/a	+	+	n/a	n/a	+	+	n/a	+	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Long Term	n/a	n/a	n/a	n/a	+	+	n/a	n/a	+	++	n/a	++	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Temporary / Permanent	n/a	n/a	n/a	n/a	I	I	n/a	n/a	D	D	n/a	D	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	I	D
Direct / Indirect	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	P	T/P	n/a	T/P	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	T/P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	L/GL	n/a	n/a	L	L/GL/W	n/a	L/GL/W	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/GL	L
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				D	D		n/a	n/a		n/a	n/a			D
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				P	P		n/a	n/a		n/a	n/a			P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L	L		n/a	n/a		n/a	n/a			L
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Temporary / Permanent				n/a					D															
Direct / Indirect				n/a					P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.5.5 E5 Strategic Industrial Locations (SIL)

### Policy description

The policy supports the proactive management of SILs through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the function of London's economy.

The policy supports development proposals in SILs for uses such as general industry, storage and distribution, light industrial and flexible uses. The policy states that proposals for other uses should be refused unless there has been a strategically co-ordinated process of SIL consolidation through a Development Plan.

The policy aims to ensure that development proposals within or adjacent to SILs do not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24 hour basis. Residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, soundproofing and other design mitigation in the residential development.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The policy would have positive effects on London's economic competitiveness and employment as it contributes to the protection of strategic industrial locations, which are significant contributors to London's employment and economic offer.

The policy would have positive effects on social integration objectives as it supports high quality and fit for purpose housing within proximity to functioning SILs, including a need for particular attention to the layout, access and public realm associated with development. This can help mitigate adverse impacts of severance and exclusion for residents living locally to designated SIL, such that SIL areas, far from acting as barriers, are better integrated within their wider spatial contexts. However, the policy is likely to conflict with objectives supporting residential growth to meet housing needs, due to conflicts over constrained land supply.

#### Cumulative

This policy could conflict with policies G6 Biodiversity and access to nature and S11 Improving air quality which seek to reduce airborne pollutants and mitigate against climate change for the benefit of the environment. It supports policies SD1 Opportunity Areas, SD2 Collaboration in the Wider South East, SD3 Growth areas in the Wider South East and beyond and SD4 The Central Activities Zone (CAZ) which support delivering wider economic growth across London.

#### Recommendations

The policy does not reference the role that SILs can play in skills, training and links with educational institutions. It is recommended that 'bridging' services to support young people from school, apprenticeships and training are particularly important, especially to those from low-income households.

### GLA response

This policy was previously part of Policy 'Land for industry, logistics and services to support London's economic function' but no changes are proposed to be made to the text of the draft policy. The GLA advised that skills, training and apprenticeships are covered in E11 and the Mayor's Economic Strategy provides further details on these issues..

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy supports proactive management of SILs.

Table 98: E5 Strategic industrial locations (SIL)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	+	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Medium Term						+	n/a		n/a	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Long Term						+	n/a		n/a	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Temporary / Permanent						I	n/a		n/a	D	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	I	I/D
Direct / Indirect						T/P	n/a		n/a	P	P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L/GL	L/GL	n/a	n/a	L	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	L/GL
<b>EQIA</b>																								
Short Term	?	?	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	?	?	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	?	+	n/a	n/a	?	n/a	n/a	n/a	n/a	++	n/a	+	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Temporary / Permanent	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	D	n/a	I/D	n/a	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Direct / Indirect	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	T/P	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL	n/a	L/GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L/GL	n/a		n/a	n/a		n/a	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.5.6 E6 Locally Significant Industrial Sites

### Policy description

The policy requires boroughs to define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps, and to make clear the range of industrial uses which will be acceptable within these designations including hybrid or flexible B-class uses suitable for SMEs. The policy requires boroughs to distinguish LSIS from local employment areas, which can support a wider range of businesses uses.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The policy would have particularly positive effects on economic competitiveness and employment, particularly through its support for SMEs which is likely to result in the growth of this important sector within London's economy. In addition, the policy supports a range of industrial and logistics uses, which could help to encourage further training and skills. This may be of particular benefit to young people and disadvantaged groups, as it will enhance the opportunities for them to access to employment opportunities, which in turn would have wider benefits to the equality, inclusion and integration within local communities.

The policy supports the intensification of industrial uses where appropriate, which may serve to steer industrial development to the most appropriate locations, promoting the most sustainable land uses across London.

The policy supports industrial businesses, which can be associated with higher emissions and therefore would have negative effects on air quality and climate change objectives, however by retaining industrial and distribution functions within London, the policy will seek to minimise displacement of these uses outside London; such displacement could exacerbate pollution and congestion due to the additional demand for freight transport that this would cause.

#### Cumulative

This policy complements policies E2 Low cost business space, E3 Affordable workspace and SD10 Strategic and local regeneration which cumulatively support local economic growth, social integration and employment.

#### Recommendations

The policy supports the provision of land for industrial uses, which pose inherent risks in terms of noise, pollution and air quality. Further detail could be included on design led solutions that could mitigate these impacts on surrounding communities.

The policy could also expand upon what 'related uses' will be acceptable in these locations, and if there could be any provision for non-industrial uses in certain circumstances.

In addition, the policy could make greater reference to the role that LSIS are expected to play in encouraging regeneration, and their relationship with surrounding communities and mixed-use residential areas. The policy could also benefit from elaborating on how different LSIS may relate to each other on wider spatial scales (e.g. a borough or London wide strategy for LSIS).

### GLA response

This policy was previously part of Policy 'Land for industry, logistics and services to support London's economic function' but no changes are proposed to be made to the text of the draft policy. Further guidance on mitigating noise, pollution and air quality given other policies in the plan. The GLA advised that E7 addresses such of co-location and related uses that might be acceptable.

The GLA further advised that details on how LSIS relate to their surrounding communities, and relate to each other on a wider spatial scale, are more appropriately taken forward in borough's Local Plans.

### Appraisal of finalised policy

This policy was previously part of Policy 'Land for industry, logistics and services to support London's economic function' but no changes are proposed to be made to the text of the draft policy.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 99: E6 Locally Significant Industrial Sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	+	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	n/a	?
Medium Term						+	n/a		n/a	+	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	n/a	?
Long Term						+	n/a		n/a	++	+	n/a	n/a	?	?	-	n/a	n/a	n/a	n/a	n/a	?	n/a	?
Temporary / Permanent						I	n/a		n/a	D	D	n/a	n/a	D	D	D	n/a	n/a	n/a	n/a	n/a	D	n/a	D
Direct / Indirect						T/P	n/a		n/a	P	P	n/a	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a	P	n/a	P
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	n/a	n/a	L	L	L	n/a	n/a	n/a	n/a	n/a	L	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+	n/a	+	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Medium Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+	n/a	+	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Long Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	++	n/a	++	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	?	?
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	D	D	n/a	D	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	I	D
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	P	T/ P	n/a	T/ P	n/a	T/ P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	T/ P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L	L/ GL /W	n/a	L/ GL /W	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				?	?		n/a	n/a		n/a	n/a			-
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				D	D		n/a	n/a		n/a	n/a			D
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				P	P		n/a	n/a		n/a	n/a			P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L	L		n/a	n/a		n/a	n/a			L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					D															
Direct / Indirect				n/a					P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.5.7 E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

#### Policy description

The policy encourages the intensification of business uses in classes B1c, B2 and B8 across all categories of industrial land, and outlines a variety of ways through which this should be achieved. The policy states that intensification should facilitate the consolidation of the SIL to support the delivery of residential and other uses, such as social infrastructure, or contribute to town centre renewal, if this would not compromise the effectiveness of the SIL as outlined in Policy E5.

The policy states that where industrial uses within the SIL or LSIS are intensified, this should to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of space for servicing.

The policy supports mixed-use or residential development proposals on Non-Designated Industrial Sites in certain circumstances, for example, where the industrial and related activities on the site are not compromised; where intensification of the industrial components of the site are operational prior to any residential development, and where appropriate design mitigation is applied. In addition, Development Plans and planning frameworks should consider the scope to facilitate the substitution of some of London's industrial capacity to related property markets in the Wider South East.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The policy would have particularly positive effects on London's economic competitiveness and employment as it supports and protects strategic industrial locations, which form a significant component of London's economy. Many of these businesses are likely to be SMEs and this policy will help to protect and enhance growth in this sector.

The policy supports a range of industrial and logistics uses to service the needs of London's population, and could help to encourage further training and up-skilling which is likely to broaden access to employment opportunities, particularly for young people and disadvantaged groups.

The policy would impact positively on housing and the promotion of sustainable land uses, as it supports the intensification of industrial uses alongside support for mixed use functions, including residential development, where appropriate. This could contribute to meeting the housing needs of London and the wider South East, as well as encouraging regeneration, which could have a number of resulting benefits for existing local communities.

The policy supports industrial businesses, which can be associated with negative environmental externalities such as pollution, noise and air quality impacts. However, the policy goes some way to offset these factors by requiring appropriate mitigating design where residential uses are brought forward in appropriate industrial locations, and will help to prevent displacement of industrial and distribution businesses to locations out of London, which in turn could exacerbate pollution and congestion due to increased demand for freight transport.

##### Cumulative

This policy could conflict against policies G4 Local green and open space, G5 Urban greening and G7 Trees and woodlands which support the protection of green spaces for public use and for climate change mitigation.

#### Recommendations

It is recommended that the policy could provide further detail on how barriers to training and employment could be overcome, including affordable housing in appropriate locations, training and skills. The policy could also more explicitly reference opportunities for regeneration and the wider benefits that this would bring.

It is also recommended that the policy, where it refers to appropriate co-location of industrial and residential uses, could expand upon the 'appropriate design mitigation' that will be expected and what this may include.

#### GLA response

The GLA advised that access to training and skills, and the development of affordable housing, are covered in specific Policies elsewhere in the Plan. The GLA further advised that barriers to training and skills are addressed in E11, with the Mayor's Economic Strategy providing further details.

#### Appraisal of finalised policy

This policy was previously part of the policy 'Land for industry, logistics and services to support London's economic function' but no changes are proposed to be made to the text of the draft policy.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy contains positive provision for sufficient access to public transport and local walk and cycle networks, thus helping to reduce atmospheric pollution from vehicle emissions.

Table 100: E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	+	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?/+	O
Medium Term						+	n/a		n/a	+	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?/+	O
Long Term						+	n/a		n/a	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?/+	O
Temporary / Permanent						I	n/a		n/a	D	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	I	I/D
Direct / Indirect						T/P	n/a		n/a	P	P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L/GL	L/GL	n/a	n/a	L	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	L/GL
<b>EQIA</b>																								
Short Term	?	?	n/a	n/a	?	+	n/a	n/a	n/a	+	n/a	n/a	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	?	?	n/a	n/a	?	+	n/a	n/a	n/a	+	n/a	n/a	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	?	+	n/a	n/a	?	+	n/a	n/a	n/a	++	n/a	n/a	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Temporary / Permanent	I	I	n/a	n/a	I	I	n/a	n/a	n/a	D	n/a	n/a	n/a	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Direct / Indirect	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	P	n/a	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	n/a	n/a	n/a	n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	n/a	n/a	n/a	n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a				n/a	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Direct / Indirect	n/a	n/a	n/a	n/a	n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a				n/a	n/a				L/GL	n/a		n/a	n/a		n/a	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.5.8 E8 Sector growth opportunities and clusters

### Policy description

The policy states that employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities. The policy also aims to maximise London's global leadership in tech across all sectors, and supports the availability of suitable workspaces for a diverse range of business sectors. Innovation for research and development and London's higher and further education institutions is also supported, alongside the promotion of clusters such as Tech City and MedCity and the development of new clusters where opportunities exist.

In addition, the policy encourages boroughs to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. The policy expands upon this to outline how SOLDCs should be supported.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The policy, through its promotion of development opportunities to support a diverse range of growth sectors, including building upon London's existing reputation as a centre for technology and innovation, is likely to have positive outcomes for London's economic competitiveness, employment, education and skills. The policy's impacts have the potential to be widespread, as it makes provision for spreading opportunities to outer London as well as enhancing existing employment clusters. This approach is likely to promote regeneration in areas of higher deprivation, increasing productivity and economic participation rates of young people and low-income groups in particular.

The policy's promotion of collaboration between business, research and development, and higher education institutions is also likely to increase the skills of the population and enhance employment opportunities, particularly in the tech sector and SMEs, which is key to London's future economic prosperity.

Furthermore, in promoting workspaces which serve technology and other creative sectors, such as laboratories and film studios, the policy is likely to result in cultural benefits associated with the creative sector, such as knowledge spillovers and the arrival of ancillary services and activities.

#### Cumulative

The policy is likely to complement policies SD1 Opportunity Areas, SD2 Collaboration in the Wider South East, SD3 Growth areas in the Wider South East and beyond and SD4 The Central Activities Zone (CAZ) which support delivering wider economic growth across London.

#### Recommendations

It is recommended that the policy could provide further reference to overcoming some of the inherent barriers to employment and participation in emerging growth sectors. This could include details on how new workspaces or clusters, particularly in SOLDCs, should maximise connectivity and accessibility via affordable transport. In addition, the policy could provide further reference to other barriers to employment access, such as appropriate skills, training, transition from education to employment, and affordable housing.

Inclusive design and management practices could also be further expanded upon, and it is also recommended that the policy could expand its scope to include reference to the ways in which workspaces can promote and support healthy workforces.

### GLA response

No changes are proposed to be made to the draft policy.

A reference was added to the supporting text in relation to start-up workspace supporting opportunities for women and people from BAME backgrounds.

The GLA advised that issues relating to inclusive design, affordable housing skills and training are covered in separate Policies in the Plan.

Transport accessibility is addressed in the transport policies and good public transport, walking and cycling access to places of employment is strengthened by the town centre first approach in the town centres policy.

The GLA further advised that the Mayor's Economic Strategy addressed issues such as skills, training, and transition from education to employment in more detail.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy promotes opportunities for growth but does not identify any specific location, or quantum.

Table 101: E8 Sector growth opportunities and clusters

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						n/a	n/a		n/a	O	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	++	n/a	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	I/D	n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/ GL	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	+	n/a	n/a	n/a	n/a	n/a	++	n/a	++	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	n/a	n/a	n/a	n/a	n/a	I/D	n/a	D	I/D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	L/ GL	L/ GL	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																									
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				O					n/a																
Medium Term				+					n/a																
Long Term				+					n/a																
Temporary / Permanent				I					n/a																
Direct / Indirect				T/P					n/a																
Local / Greater London / Wider Region / Global				L					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.5.9 E9 Retail, markets and hot food takeaways

### Policy description

This policy supports a successful, competitive and diverse retail sector, promoting sustainable access to goods and services for all Londoners. It outlines that boroughs should identify future requirements and locations for new retail development, identify areas for consolidation of retail space, bring forward capacity for additional comparison goods retailing, and support convenience retail. Local Plans should also provide a policy framework to enhance local and neighbourhood shopping facilities, identify areas underserved in local convenience shopping, and support the range of London's markets. The policy also requires Local Plans to manage clusters of retail and existing edge and out of centre retail by encouraging comprehensive redevelopment in accordance with town centre policies.

The policy outlines that large-scale retail proposals should support the provision of small shop units and proposals for the redevelopment of surplus retail space should support other planning objectives, including alternative town centre uses at ground floor level.

The policy also sets out that development proposals containing A5 hot food take-away uses should not be permitted when these are within 400m of a school, and in areas where hot food takeaways are permitted, these businesses should operate in compliance with the Healthier Catering Commitment standard.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy's aim of actively addressing shortfalls in convenience shopping in underserved areas would contribute to reducing social and economic inequalities in more deprived communities which are likely to have poorer access to basic convenience retail at present. In addition, the requirement for boroughs to have regard for health outcomes and limiting healthy food takeaways in proximity to schools may serve to reduce health inequalities, while the consideration of community safety and security as part of the management of retail units may result in reductions in crime. Again, these outcomes are likely to benefit more deprived communities which experience poorer health and community safety outcomes presently. The policy may therefore contribute positively to overall outcomes concerning equality, inclusion and social integration.

In supporting inclusive and convenient retail in town centres, this policy would help to improve access and connectivity to important services and facilities, particularly for less-mobile individuals. Improved convenience the provision of services at a local level will also help to reduce the need for travel. This could have further benefits by reducing private vehicle use and associated emissions, contributing to improvements in local air quality.

The policy could promote significant regeneration opportunities as it would support the protection and enhancement of a range of local and strategic retail facilities, while encouraging opportunities for new retail and mixed-use development in appropriate locations, thereby promoting sustainable and vibrant retail areas and town centres.

The diversity of retail activity promoted by the policy would help to maintain and enhance London's globally recognised retail offer, and is likely to create a range of employment opportunities as a result. It ensures larger retail developments support the provision of small shops and commercial units to support smaller businesses. This would serve to help maintain London's economic competitiveness.

### Cumulative

This policy complements policies SD8 Town centre development principals and local plans, T1 Strategic approach to transport, T2 Healthy streets and T6 Parking which cumulatively support the retail sector and the community wellbeing associated with mixed use developments in town centres.

### Recommendations

It was recommended that further details could be provided on inclusive design and management practices, as well as the location of retail in relation to public and affordable transport options. For large-scale retail developments or mixed-use schemes in particular, the policy could expand upon the role of affordable access, legibility and public realm.

This policy may also benefit by expanding upon how it will encourage modal shift from car use to more sustainable transport modes such as walking, cycling and public transport. It is therefore recommended that further details be provided on upgrades and improvements to pavements, provision of safety features, bike storage and car parking restrictions.

Furthermore, reference could also be made to regeneration opportunities associated with retail-led growth, and the policy could also provide reference to appropriate training and skills needed to access employment in the retail industry. This could include training, transitional services from education to employment, and the role of technology and innovation in adapting to changes within this sector.

### GLA response

No changes were proposed to be made to the draft policy, although minor amendments were made to the policy and supporting text. The Town Centres First approach outlined in Chapter 2 of the Plan will ensure that new retail development happens in well-connected locations close to public and affordable transport options. Issues relating to public realm, safety, bike and car parking, and regeneration are addressed in other Policies in the Plan.

The GLA advised that training and skills needed to access employment in the retail industry as outside the Scope of the London Plan.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 102: E9 Retail, markets and hot food takeaways

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		+	++	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		++	++	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Temporary / Permanent						I/D	I/D		D	D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Direct / Indirect						T/P	T/P		P	P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L	L	L	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	+	+	O	+	+	+	n/a	O	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	+	+	+	++	+	++	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	+	+	+	+	++	+	++	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	I/D	I/D	D	I	I/D	I/D	I/D	I/D	D	D	n/a	I	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	P	T/P	T/P	T/P	T/P	T/P	P	P	n/a	P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L	L	L	L	L	L	L/G	n/a	L/GL	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	++		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	++		n/a				++	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	I/D	I/D	D		n/a				D	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	T/P	T/P	P		n/a				P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Temporary / Permanent				D					D															
Direct / Indirect				P					P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.5.10 E10 Visitor infrastructure

### Policy description

This policy aims to strengthen London's visitor economy and associated employment by enhancing and extending its attractions, legibility, and overall visitor experience. There is a strong emphasis on protecting, enhancing and promoting key visitor attractions and supporting cultural infrastructure.

The policy encourages a balanced tourist economy, and supports the sufficient supply of quality and accessible visitor accommodation, including hotels and serviced accommodation in the CAZ, but also in other parts of inner London and in outer London. The role of apart-hotel and short-term lettings are supported while ensuring they do not compromise housing provision.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would result in a number of positive effects through the strengthening of London's visitor economy. The policy supports serviced accommodation in town centres and within Opportunity Areas, where there is good transport access and connections to the centre of London.

The promotion of tourism will support a range of economic benefits, and could stimulate job creation across a number of skills sectors. A strong visitor economy will support businesses and attractions across the city, and could contribute to wider multiplier and regenerative effects. There is particular emphasis on spreading benefits across outer London which could help to encourage job creation outside of the strategic tourist destinations.

The policy would have positive effects on the accessibility and connectivity of visitors, particularly as it supports the positioning of new accommodation close to good public transport links, encouraging the use of more sustainable forms of transport. There is also a strong emphasis on inclusive design and accessibility, which plays a significant role in overcoming severance, particularly for less mobile residents and visitors.

The policy could have adverse impacts on overall housing delivery, as it could potentially restrict housing development in favour of tourist accommodation and supporting infrastructure.

#### Cumulative

This policy aligns with policies S6 Public toilets, HC2 World heritage sites, G5 Urban greening, SD4 The Central Activities Zone (CAZ) and T2 Healthy streets which support vital infrastructure and the delivery of quality world heritage sites and green spaces to a growing visitor economy.

#### Recommendations

It was recommended that further details could be provided on how conventional housing would be protected against excessive development of visitor accommodation. It was also recommended that the scope of the policy should be expanded to include the use of brownfield land, the wider regenerative opportunities associated with the tourist industry. Further details on the definition of 'supporting infrastructure', and impacts on existing public transport infrastructure could also be included.

Although the policy references connectivity, it was recommended that greater reference to legibility is made to support visitors in manoeuvring around a potentially unfamiliar built environment.

### GLA response

Significant changes were made to accessible hotels policy requirements in Part G with additional option provided.

The GLA also included references to legibility to enhance connectivity and further information / references to supporting infrastructure including public realm, public toilets and measures to promote access by walking, cycling and public transport. However in terms of impacts on the transport network, these would be addressed by policy T4.

References were also added to spreading economic and regeneration benefits by promoting tourism.

The GLA clarified that Part D of the policy, in combination with the housing supply policies would ensure that visitor accommodation would not compromise convention housing.

### Appraisal of finalised policy

The implementation of the finalised Policy would not include a reference to secure or safe environment. However, the policy would contribute in protecting and enhancing the historic environment.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The provision of 58,000 new serviced accommodation units could pose threats to European designated sites. However, it is for individual boroughs to determine where new capacity is most suitably located, through their Local Plans and development control process and these processes will include HRA as appropriate. Therefore, growth could be delivered in the majority of London without affecting European sites.

Table 103: E10 Visitor infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Medium Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Long Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Temporary / Permanent						I	I/D		I	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a
Direct / Indirect						T/P	T/P		T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL /W	n/a	L/ GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL /W	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	n/a	O	n/a	?	O	O	O	O	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	+	n/a	O	O	+	+	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	+	n/a	+	+	+	+	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	n/a	I	n/a	I	I/D	I	I	D	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	n/a	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL /W	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		T				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/ GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				O					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Temporary / Permanent				I					n/a															
Direct / Indirect				T/P					n/a															
Local / Greater London / Wider Region / Global				L/ GL					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.5.11 E11 Skills and opportunities for all

### Policy description

This policy aims to address low pay and to support national, regional and local initiatives promote access to training, skills and employment opportunities for all Londoners.

It also encourages development proposals to encourage employment, skills development, apprenticeships, other education and training opportunities in both the construction and end-use phases, and promotes collaboration between boroughs to open up opportunities for skills and employment.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

In supporting education, improving skills and addressing low pay, the policy would likely contribute to greater levels of equality and social inclusion across London, as it would improve access to employment and promote higher wages. This is likely to benefit young people, those on low incomes, and deprived communities in particular.

By providing opportunities for enhanced skills and training, the policy would have positive effects on London's economic competitiveness and employment, as it would result in an increased pool of skilled labour and could create longer term stability in industries which require specific skills.

In addition, unemployment has been closely linked with poor mental health and low levels of physical activity, therefore, supporting and enhancing employment opportunities would also likely improve the health of residents, again, particularly in low income communities.

In requiring cross borough coordination and collaboration, the benefits of the policy are likely to be both spread across the whole city, while targeted towards the people and the communities which need them the most. This further enhances the likely effectiveness of the policy at realising positive outcomes related to equality, inclusion and social integration. These inclusive opportunities could play a role in overcoming existing barriers, including marginalisation and discrimination.

#### Cumulative

This policy would complement policies which support the provision of social infrastructure.

#### Recommendations

It is recommended that the policy could provide further information on how barriers could be removed to opportunities, particular education and employment, for low skill, low income groups and those in deprived communities. Similarly, while the policy highlights a variety of ways to support and enhance skills and opportunities, it is also recommended that further details be provided on the implementation of the suggested initiatives, and how existing barriers such as transport costs and affordable housing can be overcome. Finally, the policy could make more explicit links to wider regeneration opportunities, and associated benefits, as a result of improving education, skills and wages.

### GLA response

Significant changes were made to the policy, mostly deletion of the list of initiatives, as these are not areas that are within the remit of the London Plan and are being addressed through the work of the Skills for Londoners taskforce and the Mayor's other initiatives. With the updated policy, the GLA refined the

approach to apprenticeships. The GLA also added in a further reference to the regeneration opportunities this policy helps to enable.

The GLA advised that issues such as transport costs and accessibility, and the availability of affordable housing, are taken forward in other Policies in the Plan and other Mayoral strategies.

### Appraisal of finalised policy

No further appraisal required.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 104: E11 Skills and opportunities for all

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/ GL	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	n/a	n/a	n/a	n/a	n/a	I/D	n/a	D	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	L/ GL /W	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				O					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Temporary / Permanent				I					n/a															
Direct / Indirect				T/ P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.6 Heritage and Culture

### 9.6.1 HC1 Heritage conservation and growth

#### Policy description

This policy supports the protection of London's historic environment and the integration of London's heritage in regenerative change. This policy encourages boroughs to work in consultation with Historic England and other relevant statutory bodies to develop evidence that forms an understanding of London's historic environment, with a focus on conserving, enhancing and improving access to historical and heritage assets, landscapes and archaeology. Significant emphasis is placed on the role of development proposals in avoiding harm and identifying opportunities to effectively integrate heritage assets into plans.

This policy seeks to incorporate measures into development plans that identify assets of heritage significance and apply this knowledge to avoid or minimise harm. Development plans must demonstrate a clear understanding of the relationship between the heritage value of the site or area and its surroundings.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

This policy supports a range of measures to ensure Development Plans recognise the historical significance of local environments. It emphasises the importance both undesignated and designated heritage assets play in protection London's distinctive character and new developments should seek to proactively sustain and enhance the historic environment. This distinctive character attracts businesses, residents and tourists from across the globe and therefore remains a vital contributor to London's wider economic growth.

Engagement and collaboration with key stakeholders, including statutory bodies and local communities, would ensure historical assets of any value are preserved. Involving local communities may increase a sense of ownership among local residents and increase place making in the locality. The preservation of historical asset will also improve wider access to London's historic and cultural offerings, which can act as important centres for social interaction, community events and cultural education.

This policy also supports the creative re-use of heritage assets and the historic environment. It facilitates urban regeneration which respects and utilises the history of a local area. This policy recognises that regeneration and refurbishment can be beneficial to the longevity of heritage assets in the 21<sup>st</sup> Century and seeks to integrate the redevelopment and modernisation of London whilst protecting and promoting the city's historic assets.

##### Cumulative

The policy could conflict with policy H1 Increasing housing supply which supports residential growth due to land availability constraints in London. While the policy encourages development and structural improvements it limits how heritage assets may be managed by developers and how environmental impacts will be mitigated.

#### Recommendations

It was recommended that further information should be provided in relation to inclusive access and design practises with specific reference to the affordability of cultural opportunities and the promotion of social cohesion. Clarity was requested in relation to how heritage asses would be protected alongside new developments.

#### GLA response

Amendments were provided for further clarity and improved readability. The GLA advised that other policies in the Plan addressed issues of inclusive design in more detail, however a reference to supporting infrastructure to improve access and enhance appreciation of London's heritage assets was added. The GLA advised that the affordability of cultural opportunities was outside the scope of this policy and that the use of heritage assets and their role in contributing to social wellbeing will depend on the particular asset and the application of other plan policies e.g. social infrastructure policies

The GLA also advised that alongside national legislation which protects heritage assets, HC1 provided enough information for managing heritage assets at the strategic level.

#### Appraisal of finalised policy

Changes to the original Policy have not provided major changes to the original assessment. The implementation of this policy would enhance London's cityscape in the as conservation is supported while not discouraging new developments. The redevelopment of heritage assets with modern design and techniques would allow the promotion of low-carbon, sustainable options. The effect on energy use may only neutral as heritage asset protection will limit the scope of carbon emission improvements.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 105: HC1 Heritage conservation and growth

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	+	O	+	O/+	+	O/+	O	O	n/a	+	+	n/a	?	O
Medium Term						n/a	++		n/a	+	+	+	+	+	+	+	O	O	n/a	+	++	n/a	?	+
Long Term						n/a	++		n/a	+	+	+	+	+	+	+	+	+	n/a	+	++	n/a	?	+
Direct / Indirect						n/a	D		n/a	I	D	I/D	I/D	I	I/D	I	I/D	I	n/a	D	D	n/a	I	I
Temporary / Permanent						n/a	P		n/a	T/P	T/P	T/P	T/P	P	P	P	T/P	T/P	n/a	P	P	n/a	T/P	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/ GL	L/ GL	L	L	L	n/a	L	L/GL /W	n/a	L	L
<b>EQIA</b>																								
Short Term	+	+	n/a	+	O	+	+	n/a	n/a	+	n/a	O	+	O/+	+		n/a	n/a	n/a	O	+	n/a	n/a	O
Medium Term	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+		n/a	n/a	n/a	+	+	n/a	n/a	+
Long Term	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+		n/a	n/a	n/a	+	+	n/a	n/a	+
Direct / Indirect	I/D	I/D	n/a	I	I	I/D	I	n/a	n/a	I/D	n/a	I/D	I/D	I	I/D		n/a	n/a	n/a	I	D	n/a	n/a	I
Temporary / Permanent	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	P	n/a	T/P	T/P	P	T/P		n/a	n/a	n/a	P	P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	L	L/GL /W	L/GL /W	L	n/a	n/a	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL		n/a	n/a	n/a	L	L/GL /W	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		+				n/a	?				O/+	+		n/a	O		O	+	n/a		O
Medium Term	+	+	+		+				n/a	?				+	+		n/a	O		+	+	n/a		+
Long Term	+	+	+		+				n/a	?				+	+		n/a	+		+	++	n/a		+
Direct / Indirect	D	I/D	I/D		D				n/a	I				I	I		n/a	I		I	D	n/a		I
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	P				P	P		n/a	T/P		P	P	n/a		T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	L				L	L/ GL		n/a	L		L	L/GL /W	n/a		L
<b>CSIA</b>																								
Short Term				+					n/a															
Medium Term				O					n/a															
Long Term				O					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.6.2 HC2 World Heritage Sites

### Policy description

This policy encourages London Boroughs to actively conserve and protect World Heritage Sites (WHS), ensuring the maintenance of their authenticity and integrity is protected. The management of a WHS is to be implemented by WHS steering groups, comprising of respective and neighbouring boroughs, GLA and Historic England. The policy requires heritage impact assessments to ensure an understanding of potential impacts from proposed development

This policy emphasise the role of development proposals in promoting and enhancing the Outstanding Universal Value (OUV) of a World Heritage Site and its setting. This would be achieved by using WHS Management Plans to inform plan-making and planning applications, ensuring sufficient consideration is given to the protection and/or enhancement of WHS and its setting. This policy also facilitates individual boroughs to protect OUV, WHS and their settings within Local Plans.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

WHS form an integral part of London's townscape and character, attracting visitors from across the globe, contributing significantly to London's economic growth and prosperity. This policy ensures the protection and enhancement of WHS through the implementation of established WHS Site Management Plans, which manage the heritage assets and the wider historic environment. This policy does not prohibit development but seeks to ensure regeneration benefits WHS. Heritage Impact Assessments must form part of Development Proposals to ensure WHS and their settings are not adversely impacted by new development.

The policy supports the use of steering groups and active engagement regarding the management of these sites. This would ensure heritage assets are appropriately protected and managed in WHS, and allow local groups and interested parties to vocalise their ideas about the management and offerings of WHS. These sites can also act as important centres for cultural and community events, facilitating social integration and cultural education. This can help to improve the wider understanding and appreciation of WHS and historical assets across London.

#### Cumulative

The policy could conflict with the policy H1 Increasing housing supply which supports the development of residential housing. However, the implementation of the policy could complement policies HC1 Heritage conservation and growth and G4 Local green and open space which support the mental health and well-being of residents and visitors through active engagement with heritage and nature.

#### Recommendations

The policy could provide further clarity regarding the composition and structure of WHS Management Plans and the mechanisms of their implementation. Policy HD4 provided a strong example to follow in the London View Management Frameworks with explanatory supporting text. It was recommended that reference should be made to inclusive design and management to strengthen the cultural aspect of the

policy, specifically regarding disabled access, non-English speaking visitor inclusivity and infrastructure, such as safe paths, cycling facilities and vehicle barriers.

### GLA response

The policy was amended to clarify further the role of WHS Management Plans in respect of plan making and development proposals. However, the GLA clarified that whilst the GLA was a member of World Heritage Site Steering Groups (who were responsibly for preparing and implementing WHS management plans) they are not the lead of these groups and therefore not able to set policy in relation to the management of World Heritage Sites.

The GLA further advised that other policies in the London Plan addressed issues such as inclusive design.

### Appraisal of finalised policy

The amendments made to the policy provide further clarity in relation to how the policy will be applied however the overall effect of implementation will remain the same as noted in the initial appraisal.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 106: HC2 World Heritage Sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	+	+	+	O	n/a	O	n/a	n/a	n/a	O/+	+	n/a	n/a	O
Medium Term						n/a	+		n/a	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	++	n/a	n/a	+
Long Term						n/a	+		n/a	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	++	n/a	n/a	+
Direct / Indirect						n/a	D		n/a	D	D	I	D	I	n/a	I	n/a	n/a	n/a	I	D	n/a	n/a	I
Temporary / Permanent						n/a	P		n/a	P	P	T/P	P	P	n/a	T/P	n/a	n/a	n/a	P	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/ GL	L/ GL	L/GL /W	L/GL /W	L	n/a	L/ GL	n/a	n/a	n/a	L	L/GL /W	n/a	n/a	L
<b>EQIA</b>																								
Short Term	+	+	O	O	n/a	n/a	O	n/a	n/a	n/a	n/a	+	+	O	n/a		n/a	n/a	O	+	+	n/a	n/a	O
Medium Term	+	+	+	O	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	n/a		n/a	n/a	O	+	+	n/a	n/a	+
Long Term	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	n/a		n/a	n/a	+	+	+	n/a	n/a	+
Direct / Indirect	D	I	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	I	I/D	I	n/a		n/a	n/a	I	D	D	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	T/P	T/P	P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L	L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	L	L/ GL	L	n/a		n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	n/a		n/a				n/a	n/a				O/+	n/a		n/a	n/a		+	+	n/a		?
Medium Term	+	+	n/a		n/a				n/a	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Long Term	+	+	n/a		n/a				n/a	n/a				+	n/a		n/a	n/a		+	++	n/a		?
Direct / Indirect	I	I	n/a		n/a				n/a	n/a				I	n/a		n/a	n/a		D	D	n/a		I
Temporary / Permanent	T/P	T/P	n/a		n/a				n/a	n/a				P	n/a		n/a	n/a		T/P	P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	n/a		n/a				n/a	n/a				L	n/a		n/a	n/a		L/ GL	L/ GL	n/a		L
<b>CSIA</b>																								
Short Term				O					n/a															
Medium Term				O					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.6.3 HC3 Strategic and local views

#### Policy description

This policy aims to protect London's visual aesthetic at a city-wide level through strategic views designated by the Mayor. Strategically Important Landmarks in the views that make a significant contribution to the image of London at the strategic level are also identified.

The policy supports the use of Protected Vistas with designated viewing corridors to prevent development from obstructing historically or culturally significant assets. London Boroughs must include all strategically designated views and Protected Vistas in their Local Plans. Where a local view crosses borough boundaries the relevant boroughs should work collaboratively to designate and manage the view. Development proposals must be assessed on their impact on designated views if they fall within the foreground, middle, or background view.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The implementation of this policy supports the protection and enhancement of London's visual aesthetic, identifying important views and vistas which make up the city's townscape and character. These strategic views define London's skyline and are a vital attraction for visitors, contributing significantly to London's economic prosperity from its tourism industry. The protection of local views is equally important, defining the character of individual boroughs and individual regions of London.

Strategic views are dynamic, continuing to change and modernise. The policy does not intend to prohibit development but ensures appropriate judgement is made in an effort to add vibrancy to London's character and respect existing assets within these views. However, there are issues of subjectivity on the type, style and design of architecture and placement which could impact the viability of this policy.

Strategic views add to people's understanding and appreciation of London at a strategic level. They are often enjoyed from open spaces, which provide places for relaxation, contemplation and exercise, demonstrating the social benefits these views can offer. The provision of information, such as guides or boards, supports educational opportunities to increase residents and visitors understanding and appreciation of local and strategic views.

##### Cumulative

The policy aligns with policies HC1 Heritage conservation and growth and G4 Local green and open space which complements the access to strategic views and their conservation. However, the policy could conflict with policies H1 Increasing housing supply and SD3 Growth Areas in Wider South East and Beyond which address development and construction, particularly promoting residential growth, because of available land constraints. These policies could negatively affect the preservation of strategic views.

##### Recommendations

The policy could improve the information that is provided to include how people interact with these viewing points. It was advised that reference should be made to inclusive access that accommodates

wheelchair and buggy users, and also supports transport infrastructure, such as safe walking paths, cycling facilities and lighting. Further information should be provided regarding the way in which the public benefit.

It was recommended that information be provided codifying the types of development restrictions for protected vistas. Detail was requested in relation to the radius of surrounding impact buffer zones to assess the extent of impact in adjacent areas.

#### GLA response

Amendments were been made to the policy and supporting text to address community access and highlight inclusivity, providing education information boards and ensuring the locations were well managed to facilitate supporting infrastructure. The GLA however clarified that the London View Management Framework Supplementary Planning Guidance provided detailed guidance on managing the individual views.

#### Appraisal of finalised policy

The amendments that have been made to the policy provide further clarification on how the policy should be applied, however the effects of implementation will remain as identified in the initial assessment.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 107: HC3 Strategic and local views

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	++		?	+	+	n/a	+	O	n/a	n/a	n/a	n/a	O	+	+	n/a	n/a	O
Medium Term						n/a	++		?	+	+	n/a	+	O	n/a	n/a	n/a	n/a	O	+	+	n/a	n/a	O
Long Term						n/a	++		?	+	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a	+
Temporary / Permanent						n/a	D		I	D	I/D	n/a	D	I	n/a	n/a	n/a	n/a	I	D	D	n/a	n/a	I
Direct / Indirect						n/a	P		P	P	P	n/a	P	T/P	n/a	n/a	n/a	n/a	T/P	P	T/P	n/a	n/a	P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		L/ GL	L/G L/W	L/G L/W	n/a	L/ GL	L	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L/G L/W	n/a	n/a	L
<b>EQIA</b>																								
Short Term	+	O	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	O	n/a		n/a	n/a	O	n/a	+	n/a	n/a	O
Medium Term	+	+	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	O	n/a		n/a	n/a	O	n/a	+	n/a	n/a	+
Long Term	+	+	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	+
Temporary / Permanent	I/D	I	n/a	n/a	n/a	D	I	n/a	n/a	n/a	n/a	n/a	I/D	I	n/a		n/a	n/a	I	n/a	D	n/a	n/a	I
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a		n/a	n/a	T/P	n/a	T/P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/ GL	L	n/a	n/a	n/a	L/G L/W	L/G L/W	n/a	n/a	n/a	n/a	n/a	L/ GL	L/G L/W	n/a		n/a	n/a	L/ GL	n/a	L/G L/W	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		O				n/a	n/a				O	O		n/a	n/a		?	O	n/a		O
Medium Term	+	+	+		O				n/a	n/a				O	O		n/a	n/a		?	O	n/a		+
Long Term	++	+	+		O				n/a	n/a				+	+		n/a	n/a		?	O	n/a		+
Temporary / Permanent	D	D	D		D				n/a	n/a				I	I		n/a	n/a		I	D	n/a		I
Direct / Indirect	T/P	T/P	T/P		T/P				n/a	n/a				T/P	T/P		n/a	n/a		T/P	P	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/G L/W				n/a	n/a				L	L		n/a	n/a		L/ GL	L/ GL	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.6.4 HC4 London's view management framework

### Policy description

This policy supports development management in an effort to protect and enhance the characteristics of Strategic Views in order to maintain sufficient views of Strategically Important Landmarks, particularly World Heritage Sites and other important heritage assets that enrich London's cityscape. This is achieved by ensuring development proposals comply with criteria to avoid a canyon effect with overly intrusive changes to the view, and prevent a harsh juxtaposition resulting in a less attractive view for residents and visitors.

This policy emphasises that viewing places should be accessible and managed to enhance experiences of the view. Developments in the wider setting consultation area should preserve or enhance the ability to recognise the strategically Important Landmark.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy supports the protection and enhancement of London's visual aesthetic, protecting the views and landmarks which make up the city's townscape and character. These views and landmarks define London's skyline and are a vital attraction for visitors, contributing significantly to London's economic prosperity from its tourism industry.

Strategic views are dynamic, continuing to change and modernise. The policy does not intend to prohibit development but ensures appropriate judgement is made in an effort to add vibrancy to London's character, whilst respecting the important landmarks within the views. It outlines the need for threshold heights within Landmark Viewing Corridors and ensures that development proposals above this threshold are refused. It also protects the prominence of strategically important landmarks within these views from excessive or imposing development, which can be particularly important for historic landmarks. However, there are issues of subjectivity on the type, style and design of architecture and placement which could impact the viability of this policy.

Strategic views add to people's understanding and appreciation of London at a strategic level. They are often enjoyed from open spaces, which provide places for relaxation, contemplation and exercise, demonstrating the social benefits these views can offer. Landmarks are also important places for cultural events and activities and can also support educational research and learning, particularly historical assets.

#### Cumulative

The policy aligns with policies T2 Healthy streets, HC1 Heritage conservation and growth and G4 Local green and open space which support the conservation of natural and heritage assets for local people's health and wellbeing benefit. Conversely, the policy could conflict with policies E1 Offices, E5 Strategic Industrial Location (SIL) and H1 Increasing housing supply which focus on construction and development, particularly office and residential development, due to the constraints on available land. These policies could negatively affect the preservation of local views that have value to local people.

### Recommendations

The policy could provide more clarity in relation to the management of local views within Local Plans with the inclusion of management of congestion as overcrowding could be a serious health and safety issue. Details on inclusive access and design practises, with particular reference to buggy and wheelchair users, should be considered. It was suggested to consider the kind of attached facilities to enhance the viewing experience with information and other signage.

### GLA response

No change was made to clarify management of congestion in Local Plans as the GLA considered the London View Management Framework Supplementary Planning Guidance more appropriate to present the relevant information. Detail regarding inclusion was already addressed in Design Policy 1.

Policy HD5 main text and supporting text were altered to address inclusive access and provision of information for visitors. Information relating to Local Plans was moved to HC3

### Appraisal of finalised policy

The amendments that have been made to the policy provided further clarity in relation to how the policy will be applied, however the overall effect of implementation will remain the same as noted in the initial appraisal.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Table 108: HC4 London’s view management framework and strategic views

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	++		?	+	+	n/a	+	O	n/a	n/a	n/a	n/a	O	+	+	+	n/a	O
Medium Term						n/a	++		?	+	+	n/a	+	O	n/a	n/a	n/a	n/a	O	+	+	+	n/a	O
Long Term						n/a	++		?	+	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	+
Temporary / Permanent						n/a	D		I	D	I/D	n/a	D	I	n/a	n/a	n/a	n/a	I	D	D	D	n/a	I
Direct / Indirect						n/a	P		P	P	P	n/a	P	T/P	n/a	n/a	n/a	n/a	T/P	P	T/P	T/P	n/a	P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		L/ GL	L/G L/W	L/G L/W	n/a	L/ GL	L	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L/G L/W	L/G L/W	n/a	L
<b>EQIA</b>																								
Short Term	+	O	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	O	n/a		n/a	n/a	O	n/a	+	n/a	n/a	O
Medium Term	+	+	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	O	n/a		n/a	n/a	O	n/a	+	n/a	n/a	+
Long Term	+	+	n/a	n/a	n/a	O	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	+
Temporary / Permanent	I/D	I	n/a	n/a	n/a	D	I	n/a	n/a	n/a	n/a	n/a	I/D	I	n/a		n/a	n/a	I	n/a	D	n/a	n/a	I
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a		n/a	n/a	T/P	n/a	T/P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/ GL	L	n/a	n/a	n/a	L/G L/W	L/G L/W	n/a	n/a	n/a	n/a	n/a	L/ GL	L/G L/W	n/a		n/a	n/a	L/ GL	n/a	L/G L/W	n/a	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		O				n/a	n/a				O	O		n/a	n/a		?	O	n/a		O
Medium Term	+	+	+		O				n/a	n/a				O	O		n/a	n/a		?	O	n/a		+
Long Term	++	+	+		O				n/a	n/a				+	+		n/a	n/a		?	O	n/a		+
Temporary / Permanent	D	D	D		D				n/a	n/a				I	I		n/a	n/a		I	D	n/a		I
Direct / Indirect	T/P	T/P	T/P		T/P				n/a	n/a				T/P	T/P		n/a	n/a		T/P	P	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/G L/W				n/a	n/a				L	L		n/a	n/a		L/ GL	L/ GL	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London’s geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.6.5 HC5 Supporting London's creative and cultural industry

### Policy description

This policy supports the growth of London's diverse creative industries by encouraging boroughs to provide protection for cultural venues and facilities ensuring they are not lost to new development, where possible. The policy identifies focal points for local regeneration with development plans acting sympathetically to cultural venues, particularly those with heritage value.

The policy encourages London Boroughs to work collaboratively with the Mayor and other relevant stakeholders to outline Creative Enterprise Zones in Local Plans, with a focus on existing or emerging clusters of creative industries. The designation of a Creative Enterprise Zone will enhance the local economy and make appropriate provisions for creative industries.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would ensure the conservation and enhancement of the unique character of London's cultural and heritage assets in an effort to promote creative industries. It protects venues such as museums and galleries, and foster relationships with educational institutions who can utilise these spaces to provide inclusive learning opportunities. Improved and more frequent use can increase the cultural value and social importance these venues will have within local communities. The loss of cultural venues could have adverse effects on a local community and fracture social integration as these places regularly serve as focal point for residents and visitors.

The policy supports important employment opportunities within the creative industries. It seeks to improve the provision of affordable business space, especially by clustering creative businesses. This supports smaller businesses who may be limited by London's expensive rental costs. This would help to diversify London's economy and support growth across different industries. Creative and cultural industries play a significant role in London's tourism, and therefore this policy would help to continue attracting tourists from across the world, contributing significantly to London's economy.

#### Cumulative

The policy complements policies HC2 World Heritage Sites and E11 Sector growth opportunities and spatial clusters which support the development and growth of heritage and creative industries through conservation and the support of museums and galleries.

#### Recommendations

This policy could provide more clarity on how different groups are directly or indirectly supported by the policy. The supporting text should explicitly state what type of uses cultural venues can accommodate and what constitutes a 'creative industry'.

It was recommended that reference should be made to the management of inclusivity, specifically in relation to learning opportunities, such as language barriers, sensory impairments and mobility.

### GLA response

Substantial changes were made to the policy and supporting text in order to streamline content and improve readability. The GLA advised that the policy did indicate the range of different people that could be supported but that it was boroughs to assess local need for cultural facilities. A definition of creative industries was also included in the glossary.

The GLA advised that it wasn't appropriate for a strategic plan to identify what types of uses should go in a cultural venue as these would depend on local circumstances.

The GLA further advised that other policies in the Plan addressed issues of inclusivity and design.

### Appraisal of finalised policy

The amendments made to the policy improve readability and provide further clarity in relation to the application of the policy. The policy would encourage partnership and collaboration between creative industries and educational institutes helping to train young talent, encourage volunteer work associated with cultural opportunities and provide employment opportunities in creative industries. This would positively impact young people ensuring they receive the formal and vocational education required to attain employment in the future.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy provides positive provision for good and integrated public transport which has potential to reduce atmospheric pollution.

Table 109: HC5 Supporting London’s creative and cultural industry

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	O	n/a	+	+	O	n/a	O	n/a	n/a	n/a	O	+	n/a	n/a	?
Medium Term						+	+		n/a	+	n/a	+	+	+	n/a	+	n/a	n/a	n/a	+	+	n/a	n/a	?
Long Term						+	+		n/a	+	n/a	+	++	+	n/a	+	n/a	n/a	n/a	+	+	n/a	n/a	?
Direct / Indirect						I	I/D		n/a	I/D	n/a	I	I/D	I	n/a	I	n/a	n/a	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	n/a	L/ GL	L/ GL	L	n/a	L	n/a	n/a	n/a	L/ GL	L/ GL /W	n/a	n/a	L
<b>EQIA</b>																								
Short Term	+	+	n/a	O	n/a	+	+	n/a	?	O	?	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Medium Term	+	+	n/a	O	n/a	+	+	n/a	?	O	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Long Term	+	+	n/a	O	n/a	+	+	n/a	?	+	+	n/a	++	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	I	n/a	I	I/D	n/a	I	I/D	I/D	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	P	n/a	T/P	T/P	n/a	T	T/P	T/P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	n/a	L	n/a	L/ GL	L/ GL	n/a	L	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a		n/a	n/a	n/a	n/a	L	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				?	n/a				O	n/a		n/a	n/a		O	+	n/a		?
Medium Term	+	+	+		n/a				?	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Long Term	+	+	+		n/a				?	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Direct / Indirect	I	I	I		n/a				I	n/a				I	n/a		n/a	n/a		I/D	I	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				T	n/a				T/P	n/a		n/a	n/a		T/P	T/P	n/a		T/ P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L/ GL	L	n/a		L
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				O					?															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.6.6 HC6 Supporting the night-time economy

### Policy description

This policy encourages London Boroughs to develop strategies to manage the growth and diversity of night-time activities between the hours of 6pm – 6am, in an effort to promote London functioning as a 24-hour city. The policy supports the expansion of London's night-time economy by encouraging the extension of opening times of existing facilities and making public space and transport infrastructure safe and more accessible. Where possible, expansion should be concentrated in the Central Activities Zone (CAZ), strategic areas of night-time activity and where night-time public transport operates,

This policy advocates an integrated approach to planning, licensing, out-of-hours servicing/deliveries, security and cleansing services. Boroughs should work in conjunction with all relevant local stakeholders.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy supports the protection and enhancement of creative entertainment industries and a diverse range of events and activities in various places and spaces. This range of events and the promotion of a '24 hour city' would support wider economic growth in London, diversifying the economy and attracting visitors from across the globe. This includes the provision of non-alcohol related activities, and those specific to the LGBTQ community, promoting a culture of tolerance and inclusion across the city's evening activities.

The policy is not expected to have a significant effect on CAZs where night-time transport is already implemented. However, the policy stresses the importance of night-time transport to facilitate economic activity outside of CAZs. Night-time activities can result in pedestrian overcrowding on pavements between venues, which may be exacerbated when patrons 'spill out' from venues, particularly pubs and bars. This can have noticeable effect on noise pollution and present health and safety risks when close to roads.

Implementation of this policy could have negative impacts on health and wellbeing as there are often associations with night-time economic activities and unhealthy behaviours, such as excessive alcohol and fast food consumption. The policy does seek to curb noise pollution, but the encouragement of a night-time economy is likely to still result in an increase in local noise, which could disproportionately impact upon older residents, young children and those with a disability or health condition. However, this would be more of an issue outside of the CAZ, in predominantly residential areas and therefore needs appropriate management to mitigate the potential impacts.

The policy also supports the appropriate management of key centres to ensure safe environments. This is promoted through engagement with key stakeholders such as the police and local businesses to improve the safety, legibility and welcoming nature of night time hubs. This extends to safe, 24 hour transport options, improved public realm, and the role of 'passive surveillance'. This is particularly important for higher risk groups, including women, lesser mobile residents, religious and ethnic minority groups and LGBTQ communities.

#### Cumulative

The policy aligns with policies E11 Sector growth opportunities and spatial clusters, SD1 Opportunity Areas and T9 Funding transport infrastructure through planning as the night-time economy is a potential

growth market. Conversely, the policy may be in conflict with policies D13 Noise and T2 Healthy streets promoting a healthier city and reduces noise disturbances.

### Recommendations

It was recommended that this policy could provide further information in relation to negative health impacts often associated with the night time economy. Although the policy sought to strike a balance between assuring night-time economic growth and mitigating detrimental health impacts, further detail could be provided on how these could be mitigated or lessened, for example a reduction in fast food outlets and licensing restrictions. It was also suggested that further reference could be made to affordable activities within the night economy, to ensure opportunities are available for lower-income communities.

It was also recommended that information should be provided regarding the management of traffic flow, congested public footpaths, along with the provision of lighting and legibility measures to encourage safe access throughout the night.

### GLA response

The policy was amended to further highlight some of the potential negative impacts in relation to the night-economy, however the GLA advised that the policy supports proactive planning such as diversifying the night time offer to ameliorate the agglomeration of uses such as public houses and night clubs. Part C of the policy requires boroughs to take an integrated approach to planning and licensing, safety and security etc. by working closely with stakeholders such as the police. This would help with more indirect impacts such as the management of traffic flow and potentially congested public footpaths.

The GLA further advised that other policies within the Plan dealt with more substantive recommendations such as noise, agent of change, fast food, connectivity and public realm etc., and the affordability of activities was outside the scope of the London Plan.

### Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied and highlights some of the recommendations, however the overall effects of implementation of the policy would remain as identified in the initial assessment.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy contains positive provision as it promotes the development of the night-time economy in locations where public transport such as the Night Tube and night buses are available, thus reducing atmospheric pollution contributions from private vehicle emissions.

Table 110: HC6 Supporting the evening and night-time economy

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						n/a	O		+	+	+	n/a	+	O	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term						n/a	+		+	++	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term						n/a	+		+	++	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect						n/a	I/D		I	D	I	n/a	I/D	I	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						n/a	T/P		P	T/P	P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L		L	GL	L	n/a	GL	L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>EqIA</b>																									
Short Term	+	+	n/a	+	n/a	n/a	O	O	O	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	--
Medium Term	+	+	n/a	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-
Long Term	+	+	n/a	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-
Direct / Indirect	I	I	n/a	I	n/a	n/a	I/D	I	I	D	I	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D
Temporary / Permanent	P	P	n/a	P	n/a	n/a	T/P	P	P	T/P	P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	n/a	L	n/a	n/a	L	L	L	GL	L	n/a	GL	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																									
Short Term	+	+	-		n/a					-	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	n/a	--
Medium Term	+	+	-		n/a					-	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	n/a	-
Long Term	+	+	-		n/a					-	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a	n/a	-
Direct / Indirect	I	I	I		n/a					D	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		n/a					P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a					L	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a	n/a	L
<b>CSIA</b>																									
Short Term				?						?															
Medium Term				?						?															
Long Term				?						?															
Direct / Indirect				I/D						I/D															
Temporary / Permanent				T/P						T/P															
Local / Greater London / Wider Region / Global				L						L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.6.7 HC7 Protecting public houses

### Policy description

This policy recognises the unique and intrinsic social and cultural value public houses have to local communities. This policy supports the protection of these assets in an effort to promote the continued economic growth of these buildings as functioning pubs. This will be achieved by encouraging London Boroughs to refuse proposals that will result in the loss of public houses with heritage, cultural, economic or social value unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future. The policy further encourages the development of new public houses. This will complement Policy HC6 in achieving a vibrant and internationally competitive night-time economy in London.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy would facilitate the protection of viable public houses. These businesses contribute significantly to the economy, particularly the wider night-time economy. They also support local employment opportunities, particularly for young persons and students, who are better suited to the flexible work offered by pubs. The character and colloquial charm of pubs can make them an attractive tourist location, especially those with renowned and long history, which could further support economic growth across London. The policy would therefore, in some cases, benefit the historic environment by protecting those pubs which have historic value, such as those in listed buildings. The policy also acknowledges the cultural enhancements pubs have made historically, associated with groups and communities, promoting traditions and customs unique to London and England as a whole.

In some cases, public houses could be viewed negatively due to associated unhealthy behaviours, such as alcohol consumption, and increase noise and disturbance. This could lead to residents feeling unsafe and viewing these establishments negatively. Nevertheless, public spaces form integral parts of the local community, often acting as important centres for socialising and providing spaces for events and activities.

#### Cumulative

The policy complements policies SD1 Opportunity Areas, HC6 Supporting the evening and night-time economy and HC1 Heritage conservation and growth which support economic growth, and the support of the evening and night-time economy. This policy may conflict with policies D13 Noise and T2 Healthy streets which promote safer and healthier streets and reducing noise pollution.

#### Recommendations

The policy could promote the historic significance of public houses further by considering educational opportunities or information about the heritage of specific public houses. This would likely have a positive effect on the influx of tourists travelling to pubs. More clarity relating to the encouragement of new public houses was asked for. The policy did not state what controls or mechanisms were considered to achieve this, control on rents and protection against noise complaints were good examples.

It was recommended that the prevalence of flexible work suitable for young people and students should be highlighted in the supporting text.

It was suggested reference be made to the mitigation measures to reduce anti-social behaviour and measures to reduce noise disturbances in an effort to keep the surrounding area safe and favourable to live in. Moreover, the policy was advised to take physically and mentally unhealthy behaviour into consideration and provide possible mitigation practises.

### GLA response

The GLA advised that the promotion of education opportunities of historic pubs is beyond the scope of the strategic plan, however policy HC1 did address this to some degree.

References to the unique and varied role of pubs, their contribution to the regeneration of town centres or local areas were included as were references to saturation levels and the agent of change principle in the consideration of new pubs. A stronger link was made to policy HC6 night-time economy in mitigating potential anti-social behaviour.

The GLA also advised that other policies in the Plan such as HC6 Night-time Economy, D13 Noise, D12 Agent of Change addressed the specifics of the recommendations.

### Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied and highlights some of the recommendations, however the overall effects of implementation of the policy would remain as identified in the initial assessment.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Table 111: HC7 Protecting public houses

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	+		n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	-
Medium Term						?	+		n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	?
Long Term						?	+		n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	?
Direct / Indirect						I	I/D		n/a	D	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	D
Temporary / Permanent						T/P	T/P		n/a	P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L	L		n/a	L, GL	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L <sup>GL</sup> / <sub>W</sub>	n/a	n/a	L
<b>EQIA</b>																								
Short Term	O	+	?	-	n/a	?	O	+	n/a	?	n/a	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	O	n/a	n/a	--
Medium Term	O	+	?	-	n/a	?	O	+	n/a	+	n/a	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	--
Long Term	O	+	?	-	n/a	?	+	+	n/a	+	n/a	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	-
Direct / Indirect	I/D	I/D	D	I	n/a	I	I/D	D	n/a	I	n/a	n/a	D	n/a	n/a		n/a	n/a	n/a	n/a	I/D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	P	n/a	T/P	n/a	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	L	L	L, GL	n/a	L/ GL	n/a	n/a	L/ GL	n/a	n/a		n/a	n/a	n/a	n/a	L <sup>GL</sup> / <sub>W</sub>	n/a	n/a	L
<b>HIA</b>																								
Short Term	O	+	?		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		--
Medium Term	O	+	?		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		-
Long Term	O	+	?		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		-
Direct / Indirect	I/D	I/D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	I/D	n/a		I/D
Temporary / Permanent	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	T/P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		L
<b>CSIA</b>																								
Short Term				?/-					n/a															
Medium Term				?/-					n/a															
Long Term				?/-					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7 Green infrastructure and natural environment

### 9.7.1 G1 Green Infrastructure

#### Policy description

The policy facilitates the Mayor's long-term target of making London 50% green by 2050 supporting development that increases green infrastructure (for example, street trees and green roofs). The policy requires boroughs to prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, healthy living, sport and recreation. The policy aims to address environmental and social challenges through strategic green infrastructure interventions.

#### Initial Appraisal and Recommendations

##### Social, economic and environmental effects

Through the provision of green infrastructure, this policy seeks to improve the liveability of urban environments and increase access to nature. Green infrastructure, such as green walls, and landscaped areas can enhance local areas and improve positive feelings about the area within the local community. Natural elements within urban areas have also been associated with improved mental wellbeing amongst residents. The protection of open spaces also provides areas for physical exercise and social integration.

The use of green infrastructure would help to enhance development and contribute positively to the natural environment through design. Green infrastructure can also drive increased energy efficiency by reducing local temperatures and shading building surfaces, reducing the amount of energy required to cool buildings. Similarly, green facades can absorb sounds, thereby reducing local noise levels.

This policy ensures positive contributions towards environmental protection and enhancement and climate change resilience. It would contribute to reducing the urban heat island effect, as some buildings would be covered, at least partly, by natural elements. Where measures, such as the planting of trees, are possible, flooding in adjacent, populated areas could be reduced due to increased interception of flood waters and improved soil stability. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow would also be controlled, helping to reduce discharges to surface and ground waters.

Although this policy does not directly refer to cultural activities, the safeguarding of green and open space can fulfil a range of social and cultural needs. This policy encourages the protection and enhancement of green and open spaces which are often important areas for the local community, providing spaces for cultural and community events and facilities. Additionally, heritage assets within these spaces would also benefit from the protection of green and open spaces. Biodiversity and heritage conservation can be complimentary and mutually enhancing if managed and designed holistically.

##### Cumulative

The policy would have positive cumulative impacts as it complements policies G4 Local and open space, G7 Trees and woodland and T2 Healthy streets that support environmental protection and the provision of open space, green networks and community health and wellbeing.

##### Recommendations

No specific recommendations were identified for this policy.

#### GLA response

No change to the policy were required.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 112: G1 Green Infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		+	n/a	O	n/a	+	O	+	O	O	+	+	+	+	O	n/a	+
Medium Term						?	+		+	n/a	+	n/a	+	+	+	+	+	+	+	+	+	+	n/a	+
Long Term						?	+		?	n/a	+	n/a	+	+	+	+	+	+	+	++	+	+	n/a	+
Direct / Indirect						I	I/D		D	n/a	I/D	n/a	I	I	I/D	I	I	I/D	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						T/P	T/P		P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL /W		L/GL	n/a	L	n/a	L	L	L	L/GL	L/GL	L/GL /W	L	L/GL /W	L/GL /W	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	+	O	+	+	O	n/a	n/a	n/a	n/a	O	+	+		O	O	+	+	+	O	n/a	O
Medium Term	+	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a	+	+	+		O	+	+	+	+	O	n/a	O
Long Term	+	++	++	+	+	+	+	+	n/a	n/a	n/a	n/a	+	+	+		+	+	+	++	+	+	n/a	+
Direct / Indirect	I	I	I/D	I/D	I	D	I	I	n/a	n/a	n/a	n/a	I	D	D		D	I	D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P		T/P	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W	L	L	L/GL	L	L/GL /W	n/a	n/a	n/a	n/a	L	L/GL	L/GL		L/GL	L/GL /W	L/GL	L/GL /W	L/GL /W	L	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		O				O	n/a				O	O		O	O		+	O	O		+
Medium Term	+	+	+		O				O	n/a				+	+		O	+		+	+	O		+
Long Term	+	+	++		+				O	n/a				+	+		O	+		+	+	O		+
Direct / Indirect	I	I/D	I/D		D				D	n/a				I	I		I	I		D	D	I		I
Temporary / Permanent	T/P	T/P	T/P		P				P	n/a				T/P	T/P		T/P	T/P		T/P	T/P	P		T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W		L				L/GL /W	n/a				L/GL	L		L/GL	L/GL /W		L/GL /W	L/GL /W	L		L
<b>CSIA</b>																								
Short Term				+					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL /W					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7.2 G2 London's Green belt

### Policy description

The policy supports the protection of London's green belt from inappropriate development by resisting development proposals which would harm the green belt. It also promotes the extension and enhancement of green belt to provide improvements which will benefit Londoners and continue making positive contributions to biodiversity, flood prevention and reducing the urban heat island effect.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Good quality green space can offer a range of benefits to the local environment. These spaces can benefit physical and mental wellbeing, providing a location for activities such as exercise, recreation, social and cultural events and mindfulness. The protection and improvement of green belt land can also help to create better quality open spaces, offering improvements to the townscape and character of the local areas.

The improvement to those areas of the green belt which have fallen into a poorer state is vital for the protection of the habitats and species which make up London's important and unique natural capital and biodiversity. The protection of green belt land would also help to preserve the physical integrity of any heritage and cultural assets and their settings that fall within and relate to such spaces.

Through the protection of green belt land from inappropriate development, such as polluting industry and construction practices, the policy would contribute to improvements in local air quality. Extended green belt boundaries would increase the provision of public open space, and potentially provide a buffer between polluting areas and surrounding residential communities. It would also help to prevent increases in ambient noise conditions and provide quiet, tranquil spaces for local residents.

The retention and extension of the green belt would positively contribute to climate change adaptation and mitigation especially where tree planting is encouraged. The planting of trees is linked with a reduction in flood risk due to the interception of water and increased soil stability. The maintenance and improvement of green belt land would also help mitigate the effects of surface run off and ground water discharge. This would deliver more stable environments that can be utilised for recreational purposes as well as benefiting nature conservation.

This policy however does restrict development by limiting the amount of available space for the construction of business or housing stock.

#### Cumulative

This policy could conflict with policies SD1 Opportunity Areas, E11 Sector growth opportunities and spatial clusters and E1 Offices which encourage construction, development and employment growth across London. Implementation of the policy would however complement policies G1 Green infrastructure and H11 Ensuring the best use of stock that support environmental protection, efficient use of land and the promotion of community health and wellbeing from access to nature.

#### Recommendations

It was recommended that further information is provided on uses which would be permitted in the green belt, such as multi-functional uses for recreation and how they could be managed. It was also

recommended that further detail was provided on definition of inappropriate development and circumstances surrounding green belt extension, for example whether renewable energy developments be considered appropriate development.

It was recommended that further reference be made to accessibility of the green belt in relation to its multi-functional uses.

### GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that the consideration of inappropriate development was a matter for boroughs to decide.

Additional reference in supporting text was made to improving access.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Table 113: G2 London’s Green Belt

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	O		n/a	?	n/a	n/a	n/a	O	O	O	?	+	+	+	+	+	+	n/a	+
Medium Term						+	O		n/a	?	n/a	n/a	n/a	+	+	+	?	+	+	+	+	+	+	n/a	+
Long Term						+	O		n/a	-	n/a	n/a	n/a	+	+	+	?	+	+	+	+	+	+	n/a	+
Temporary / Permanent						I/D	D		n/a	D	n/a	n/a	n/a	I	I/D	I	I	I	I/D	D	I/D	I/D	n/a	I	
Direct / Indirect						P	T/P		n/a	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T	T/P	T/P	P	P	T/P	n/a	T/P	
Local / Greater London / Wider Region / Global						L/GL /W	L/GL /W		n/a	L/ GL	n/a	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	L/GL /W	L	L/GL /W	L/GL /W	L	n/a	L	
<b>EQIA</b>																									
Short Term	+	+	+	+	-/?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	O		n/a	+	+	+	+	+	+	n/a	+
Medium Term	+	+	+	+	-/?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	+	+	+	+	+	+	n/a	+
Long Term	+	+	+	+	-/?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	+	+	+	+	+	+	n/a	+
Temporary / Permanent	I/D	I/D	I/D	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	I		n/a	I	I/D	D	I/D	I/D	n/a	I	
Direct / Indirect	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	T/P	T/P	T/P	P	T/P	n/a	T/P	
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L		n/a	L/GL /W	L	L/GL /W	L/GL /W	L	n/a	L	
<b>HIA</b>																									
Short Term	+	+	+		-/?				n/a	?				O	O		O	O		+	+	+		+	
Medium Term	+	+	+		-/?				n/a	?				+	+		+	+		+	+	+		+	
Long Term	+	+	+		-/?				n/a	?				+	+		+	+		+	+	+		+	
Temporary / Permanent	I/D	I/D	I/D		I				n/a	D				I	I		I	I		D	I/D	D		D	
Direct / Indirect	T/P	T/P	T/P		T/P				n/a	T/P				T/P	T/P		T	T/P		T/P	P	P		T/P	
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W		L/GL /W				n/a	L/ GL				L/ GL	L		LG	L/GL /W		L/GL /W	L	L		L/GL /W	
<b>CSIA</b>																									
Short Term				+					n/a																
Medium Term				+					n/a																
Long Term				+					n/a																
Temporary / Permanent				D					n/a																
Direct / Indirect				T/P					n/a																
Local / Greater London / Wider Region / Global				L/ GL					n/a																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London’s geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.7.3 G3 Metropolitan open land

#### Policy description

This policy supports the protection of Metropolitan Open Land (MOL) from inappropriate development by resisting development proposals which would harm it. It also promotes the extension and enhancement of MOL to improve Londoner's quality of life through the provision of space which offers recreational and leisure use, cultural and heritage value, landscape, biodiversity, and green infrastructure. This policy requires that any proposals that alter the boundaries of MOL be undertaken through the Local Plan process, in consultation with the GLA and adjoining boroughs.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

The protection and enhancement of MOL from inappropriate development would offer a number of health and equality benefits. It promotes inclusion through the preservation of key sites of environmental and cultural value. Good quality green space can offer a number of mental and physical health and wellbeing benefits, through the provision of suitable space for activities such as exercise or mindfulness.. The protection and improvement of MOL would also help to create better quality open space, which can contribute to more positive feelings about the local environment, increasing its usability and attractiveness.

The retention and enhancement of MOL would support climate change adaptation and mitigation especially where tree planting is encouraged. The planting of trees is linked with a reduction in flood risk, as they intercept precipitation. The maintenance and improvement of MOL would also help mitigate the effects of surface run off and ground water discharge, which can occur from overdevelopment. This would help to create stable environments that act as buffers and can be utilised for recreational purposes as well as benefit nature conservation. Importantly, the biodiversity within these areas would be protected from potentially harmful development and be allowed to flourish, increasing and improving London's wider natural capital offering.

Cultural or historic assets that are located within, or alongside MOL, would benefit from the protection and enhancement of this land, providing they respect the natural habitats within the MOL. By extending or improving the quality of MOL, would also prevent increases to ambient noise conditions and create natural buffers from sound sources to sensitive receptors.

This policy however does restrict development by limiting the amount of available space for the construction of business or housing stock.

##### Cumulative

This policy could conflict with policies E11 Sector growth opportunities and spatial clusters, SD4 The Central Activities Zone (CAZ) and H1 Increasing housing supply which encourage construction and development by limiting land availability. The implementation of the policy would however complement policies G1 Green infrastructure, G4 Local green and open land and HC1 Heritage conservation and growth that support environmental protection, open space and promotion of community health and wellbeing through conservation of heritage sites.

#### Recommendations

It was recommended that further information be provided on uses which would be permitted in MOL, such as multi-functional uses for leisure and recreation and how they could be managed. Details on accessibility, design and ongoing maintenance of MOL should be considered. It was also recommended that a definition of what inappropriate development is and the circumstances surrounding MOL extension, for example whether renewable energy developments be considered appropriate development.

#### GLA response

The GLA advised that appropriate and inappropriate uses are defined in NPPF Green Belt policy, however the references to examples of improvements to MOL were included including inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present, although increasing the range of uses of MOL would need to be mindful of the sensitivities of some of these areas which overlap with internationally important wildlife sites

Table 114: G3 Metropolitan Open Land

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	O		?/+	?	?/+	n/a	+	O	O	O	?	+	+	O	+	O	n/a	O
Medium Term						n/a	O		?/+	?	?/+	n/a	+	+	+	+	?	+	+	+	+	O	n/a	+
Long Term						n/a	O		?/+	?	?/+	n/a	+	+	+	+	?	+	+	++	+	O	n/a	+
Direct / Indirect						n/a	D		D	D	I	n/a	I	I	I/D	I	I	I	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						n/a	T/P		P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L/ GL	L	n/a	L	L/ GL	L	L/ GL	L/ GL	L/ GL /W	L	L/ GL /W	L/ GL	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	+	-/?	?	O	n/a	n/a	n/a	+	n/a	O	O	O		n/a	+	+	+	+	O	n/a	O
Medium Term	+	+	++	+	-/?	?	O	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	+	+	O	n/a	+
Long Term	+	+	++	+	-/?	?	+	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	++	+	+	n/a	+
Direct / Indirect	I/D	I/D	I/D	I	I	I	I	n/a	n/a	n/a	I	n/a	I	I	I		n/a	I	I/D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	T/P	T/P	T/P		n/a	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W	L	L	L/ GL	L	n/a	n/a	n/a	L	n/a	L	L/ GL	L		n/a	L	L	L/ GL /W	L/ GL /W	L	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		-/?				?	?				O	n/a		O	+		+	+	?		O
Medium Term	+	+	++		-/?				?	?				O	n/a		+	+		+	+	?		+
Long Term	+	+	++		-/?				?	?				+	n/a		+	+		++	+	?		+
Direct / Indirect	I/D	I/D	I/D		I				D	D				I	n/a		I	I		D	I/D	D		D
Temporary / Permanent	T/P	T/P	T/P		T/P				P	T/P				T/P	n/a		T	T/P		T/P	P	P		T/ P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W		L				L/ GL	L/ GL				L/ GL	n/a		L/ GL	L/ GL /W		L/ GL /W	L	L		L/ GL /W
<b>CSIA</b>																								
Short Term				+					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.7.4 G4 Local green and open space

### Policy description

The policy supports the Mayor's long-term target of making more than 50% of London green by 2050. It promotes the protection and creation of green and open spaces, especially in areas where open space is deficient. The policy requires boroughs to prepare a green infrastructure strategy and undertake a green and open space needs assessment. Where green and open space will be lost (outside of areas of deficiency), the policy requires the provision of equivalent of replacement habitat, unless the needs assessment demonstrates that this is unnecessary.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Green and open spaces can offer a number of benefits to health and wellbeing. These spaces can provide suitable areas for activities such as exercise or mindfulness and also act as centres for community and cultural events, facilitating improved social integration and community cohesion. Depending on their design, green and open can also facilitate other forms of activity, such as active transport if high quality and well-connected footpaths are provided. The protection and improvement of these spaces would also help to create better quality environments, which can contribute to more positive feelings about the local area, increasing its overall usability and attractiveness.

The protection and creation of new green and open spaces could also help contribute to improvements in air quality. For example, well-connected open spaces could decrease vehicle use and facilitate more sustainable forms of transport, such as walking and cycling. By increasing or improving the quality of green and open spaces, this policy would also help to prevent increases to ambient noise conditions and create natural buffers from sound sources to sensitive receptors.

The retention and enhancement of green and open spaces supports climate change adaptation and mitigation, especially where tree planting is encouraged. The planting of trees is linked with a reduction in flood risk, as they intercept precipitation. The maintenance and improvement of green and open spaces would also help mitigate the effects of surface run off and ground water discharge, which can occur from overdevelopment. This would help to create stable environments that act as buffers and can be utilised for recreational purposes as well as benefit nature conservation.

Implementation of this policy would also encourage the protection of open space which could help to preserve the physical integrity of heritage assets and their settings that fall within and relate to such spaces. It can also support cultural activities by providing spaces for events which support local culture and community groups. However, these would need to respect the natural environment to ensure damage to habitats and species does not occur.

The implementation of this policy may however impact housing supply, as protecting and expanding open space would limit the availability of undeveloped land.

#### Cumulative

This policy could conflict with policies E11 Sector growth opportunities and spatial clusters, SD4 The Central Activates Zone (CAZ) and H1 Increasing housing supply which encourage growth in construction and development, where developments may result in a loss of green space or do not propose

the creation of new green and open space. However, it does complement policies G7 Trees and woodland, T2 Healthy streets and S11 Improving air quality which support environmental protection and improving community health and wellbeing through access to nature.

#### Recommendations

It was recommended that further information be provided on uses that would be permitted in green spaces, such as multi-functional uses for leisure and recreation and how they could be managed. Details on accessibility (including connectivity), design and ongoing maintenance of the open space should be considered.

#### GLA response

No changes were made to the draft policy. Additional text was added to reflect the importance of connections and accessible design.

References to management and maintenance were also included however the GLA advised that specific details on how green and open spaces were managed are more appropriate for boroughs as would depend on local circumstances. The GLA further advised that other policies in the Plan address issues of other uses such as play, sustainable drainage etc.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 115: G4 Local green and open space

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	n/a	+	n/a	n/a	O	O	O	O	+	+	+	+/?	O	n/a	+
Medium Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Direct / Indirect						D	I/D		I/D	n/a	I	n/a	n/a	I	I/D	I	I/D	I/D	I/D	I/D	I/D	I/D	n/a	I
Temporary / Permanent						P	T/P		T/P	n/a	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	n/a	L/ GL	n/a	n/a	L	L	L/ GL	L	L/ GL /W	L	L/ GL /W	L/ GL /W	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	?	-/?	+	+	+	+	n/a	+	n/a	+	O	O		n/a	+	+	+	+	O	n/a	O
Medium Term	+	+	+	+	-/?	+	+	+	+	n/a	+	n/a	+	+	O		n/a	+	+	+	+	O	n/a	+
Long Term	+	+	++	+	-/?	+	+	+	+	n/a	+	n/a	+	+	+		n/a	+	+	+	+	+	n/a	+
Direct / Indirect	I	I/D	I/D	I	I	D	L	I	I/D	n/a	I/D	n/a	I/D	I	I/D		n/a	I	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P		n/a	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W	L	L/ GL /W	L/ GL	L/ GL /W	L/ GL /W	L/ GL	n/a	L/ GL /W	n/a	L/ GL /W	L/ GL	L/ GL		n/a	L/ GL /W	L	L/ GL /W	L/ GL /W	L	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		-/?				?	?				O	n/a		O	+		+	+	?		O
Medium Term	+	+	+		-/?				?	?				+	n/a		O	+		+	+	?		+
Long Term	+	+	++		-/?				?	?				+	n/a		O	+		+	+	?		+
Direct / Indirect	I/D	I/D	I/D		I				D	I				I/D	n/a		I	I		D	I/D	D		D
Temporary / Permanent	T/P	T/P	T/P		T/P				P	P				T/P	n/a		T	T/P		T/P	P	P		T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W		L/ GL /W				L/ GL	L				L/ GL	n/a		L/ GL	L/ GL /W		L/ GL /W	L	L		L/ GL /W
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7.5 G5 Urban greening

### Policy description

This policy supports the Mayor's long-term target of making London at least 50% green by promoting development that increases green cover (for example, trees, green roofs and high-quality landscaping). The policy requires boroughs to identify the appropriate amount of urban greening required in new developments through the development of an Urban Greening Factor (UGF).

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Green infrastructure can play an important role in improving the liveability of urban environments and increasing access to nature in the most built up parts of the city. Green infrastructure, such as green walls, and landscaped areas can contribute to enhancement in the local areas and improve positive feelings about a local area. Natural elements within urban areas have also been associated with improved mental wellbeing.

The use of green infrastructure can enhance development and contribute positively to the natural environment through design. Green infrastructure can also support increased energy efficiency by reducing local temperatures and shading building surfaces, reducing the amount of energy required to cool buildings. Similarly, green facades can absorb sounds, thereby reducing local noise levels.

Implementation of this policy can also ensure positive contributions towards climate change resilience, including managing the urban heat island effect. Where measures such as the planting of trees are possible, flooding in adjacent areas could be reduced due to increased interception of rain water and improved soil stability. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow would also be controlled, helping to reduce discharges to surface and ground waters.

#### Cumulative

This policy complements policies G4 Local green and open space, T2 Healthy streets and S11 Improving air quality which support environmental protection that can benefit health and wellbeing by reducing air quality impacts. Additionally, the combination of policies promote the provision of open space and green networks which can promote active healthy lifestyles.

#### Recommendations

It was recommended that the policy be expanded to include further detail on green infrastructure options and climate resilience that would be supported by the policy. It was also suggested clarification was provided on the how Policy could be applied to existing properties, i.e. retrofitting.

It was also recommended that further detail is provided on how the Urban Greening Factor would be calculated.

### GLA response

The supporting text was amended to clarify the application of the Urban Green Factor. Further clarification was provided that the table set interim standards for both commercial and residential developments in advance of boroughs adopting their own local benchmarks.

The GLA advised that other policies such as G1 Green Infrastructure provides more detail on the types of green infrastructure. The GLA also identifies that more detail, including retrofitting and wider engagement in relation to climate resilience can be found within the London Environment Strategy.

### Appraisal of finalised policy

The amendments which have been made to the policy provide further clarification on how the policy should be applied, however the effects of implementation of the policy would remain as identified in the initial assessment.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 116: G5 Urban greening

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	n/a	O	n/a	n/a	O	O	O	O	+	O	+	+/?	O	n/a	+
Medium Term						n/a	+		n/a	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Long Term						n/a	+		n/a	n/a	+	n/a	n/a	+	+	+	+	+	+	++	+/?	+	n/a	+
Direct / Indirect						n/a	I/D		n/a	n/a	I/D	n/a	n/a	I	I/D	I	I/D	I/D	I/D	D	D	I/D	n/a	I
Temporary / Permanent						n/a	T/P		n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	n/a	L	n/a	n/a	L	L	L/GL	L	L/GL /W	L	L/GL /W	L/GL /W	L	n/a	L
<b>EQIA</b>																								
Short Term	O	O	+	n/a	O	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	+	n/a	n/a	n/a	O
Medium Term	O	O	+	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	+	n/a	n/a	n/a	O
Long Term	+	+	++	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	++	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	I	D	I	n/a	n/a	n/a	n/a	n/a	n/a	D	D		D	I	D	D	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/GL		L/GL	L/GL /W	L/GL	L/GL /W	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	+		O				n/a	n/a				O	O		?	+		+	n/a	?		+
Medium Term	n/a	n/a	+		O				n/a	n/a				+	+		?	+		+	n/a	?		+
Long Term	n/a	n/a	++		+				n/a	n/a				+	+		?	+		++	n/a	?		+
Direct / Indirect	n/a	n/a	I/D		D				n/a	n/a				I	I		I	I		D	n/a	I		I
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a				T/P	T/P		T/P	T/P		T/P	n/a	P		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L/GL	L		L/GL	L/GL /W		L/GL /W	n/a	L/GL		L/GL /W
<b>CSIA</b>																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7.6 G6 Biodiversity and access to nature

### Policy description

The policy supports the protection of Sites of Importance for Nature Conservation (SINCs) and green corridors from inappropriate development and aims to improve access to wildlife sites. It also promotes the extension and enhancement of SINCS and green corridors by requiring boroughs to identify areas of deficiency in access to nature and seek opportunities to create habitats of relevance and benefit in the urban context.

The policy sets out a hierarchy of mitigation where harm to a SINCs is unavoidable, the approach is to avoid adverse impacts, or minimise adverse impacts by requiring on-site mitigation and in exceptional cases provide off-site compensation.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

SINCs and green corridors can play an important role in improving the liability of the urban environment. These areas offer wider health and wellbeing benefits, providing areas for physical exercise, such as walking, and for conservation groups. This can increase access to the natural environment within London, and increase environmental and biodiversity education for local residents and groups. Green corridors and attractive green spaces can also facilitate increased active transport when they are well-connected with good walking and cycling infrastructure.

Implementation of this policy would support improvements to the local environment, protecting areas from inappropriate development. These protected sites can provide spaces of tranquillity and reduce ambient noise conditions for local residents. The planting of trees is linked with a reduction in flood risk, due to interception of precipitation, and increased soil stability. The protection of SINCs would therefore help to mitigate the effects of surface run off and ground water discharge, creating more stable environments that can be utilised for recreational purposes as well as benefiting nature conservation.

The protection of strategic environmental sites would also have positive effects on the historic environment. Depending on the nature of the site, this would help to preserve heritage and cultural assets within, which often have important community value and can provide recreational and educational opportunities for communities.

#### Recommendations

It was recommended that the policy should be expanded to include further detail on the type of development which would be supported in SINCs and how SINCs could be used by local residents for leisure and recreation and any potential transport infrastructure that could be implemented. It was also suggested clarification be provided on the approach to maintenance of the open space and connections between green and open space and creation of green corridors (e.g. tree planting, use of brownfield land). There should also be further detail on the approach to the maintenance of these spaces.

#### Cumulative

Potential cumulative effects of implementing the policy include conflict with policies E11 Sector growth opportunities and spatial clusters, SD4 The Central Activities Zone (CAZ) and H1 Increasing housing

supply which encourage construction and seek to meet residential and economic needs, due to a reduction in the supply of land. Implementation of the policy would however complement policies G7 Trees and woodland, G5 Urban greening and SI1 Improving air quality that support environmental protection, open space and promotion of community health and wellbeing.

### GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance on access and maintenance and importance of connections between habitats.

The GLA considered that it is more appropriate for further information and clarification to be provided by boroughs through local plans and not the London Plan. It also considers that some aspects covered in the recommendations are addressed by other policies, such as D11 Noise. The GLA clarified that, in general, apart from supporting infrastructure such as a bird hides or improving access such as level paths, development would not be appropriate in SINCs.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy seeks to protect nature conservation sites including European designated sites.

Table 117: G6 Biodiversity and access to nature

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		O	n/a	+	n/a	n/a	O	O	O	n/a	+	O	+	+	O	n/a	+
Medium Term						n/a	+		+	n/a	+	n/a	n/a	+	O	+	n/a	+	+	+	+	+	n/a	+
Long Term						n/a	+		+	n/a	+	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	+
Direct / Indirect						n/a	I/D		I	n/a	I	n/a	n/a	I	I/D	I	n/a	I/D	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						n/a	T/P		T/P	n/a	P	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	n/a	L/GL	n/a	n/a	L	L	L/GL	n/a	L/GL/W	L	L/GL/W	L/GL/W	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	+	-/?	n/a	+	O	+	n/a	n/a	n/a	+	O	O		O	O	O	+	+	O	n/a	O
Medium Term	+	+	+	+	-/?	n/a	+	+	+	n/a	n/a	n/a	+	O	O		+	+	O	+	+	O	n/a	+
Long Term	+	+	++	+	-/?	n/a	+	+	+	n/a	n/a	n/a	+	+	+		+	+	+	++	+	+	n/a	+
Direct / Indirect	I	I	I	I	I	n/a	I	I	I/D	n/a	n/a	n/a	I/D	I/D	I/D		I/D	I	I/D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P		T/P	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W	L	L/GL/W	n/a	L	L/GL/W	L/GL	n/a	n/a	n/a	L/GL	L/GL	L/GL		L/GL	L/GL/W	L	L/GL/W	L/GL/W	L	n/a	L
<b>HIA</b>																								
Short Term	+	+	+		-/?				+	n/a				O	n/a		n/a	O		O	O	+		O
Medium Term	+	+	+		-/?				+	n/a				O	n/a		n/a	O		+	+	+		+
Long Term	+	+	++		-/?				+	n/a				+	n/a		n/a	+		++	+	+		+
Direct / Indirect	I	I	I		I				D	n/a				I	n/a		n/a	I		D	D	D		D
Temporary / Permanent	P	P	T/P		T/P				P	n/a				T/P	n/a		n/a	T/P		T/P	T/P	P		T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL/W	L/GL/W		L/GL				L/GL	n/a				L/GL	n/a		n/a	L/GL/W		L/GL/W	L/GL/W	L		L/GL
<b>CSIA</b>																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7.7 G7 Trees and woodlands

### Policy description

This policy supports the Mayor's long-term target of increasing London's tree cover by 10% by 2050. It supports the protection of existing trees and woodlands and development that would retain and increase tree coverage. Where tree removal will take place due to development, the policy requires mitigation to be implemented following the 'right tree, right place' concept promoted by the Tree and Woodland Framework.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Trees and woodland can provide important places for local communities. They offer spaces for activities such as mindfulness and walking, and can facilitate the development of groups such as conservationists or bird watchers. Providing attractive and walkable environments could also facilitate an increase in active travel by walking or cycling, reducing private vehicle use and associated emissions and increasing physical activity. These factors can all contribute to improved wellbeing and encourage social interaction and community cohesion. The protection and planting of trees and woodlands can also improve the quality of the local environment to encourage greater positive feelings about the locality.

The protection of woodlands and trees would also support climate change adaptation and mitigation as the planting of trees is linked with a reduction in flood risk, as they intercept precipitation and increase soil stability, with woodlands acting as important carbon sinks. The protection of woodland and trees would also help to mitigate the effects surface run off and ground water discharge. This would help to create stable environments that can be utilised for recreational purposes as well as benefiting nature conservation. Any trees planted in the vicinity of waterbodies could also help to improve and protect local water quality.

Clusters of trees can act as a buffer between residential areas and industrial land uses. This could offer localised air quality improvements and even mitigation from noise impacts, depending on the depth (10m or more) and density of foliage. These areas also provide important quiet, tranquil areas which can be used by the community to help improve wellbeing.

The protection and expansion of woodland areas could limit land for future development, such as housing or industry. However, increasing tree coverage in general could help new housing developments be viewed as more attractive and increase positive feelings about these new sites.

#### Cumulative

This policy could conflict with policies SD1 Opportunity Areas, SD4 The Central Activities Zone (CAZ) and E11 Sector growth opportunities and spatial clusters which encourage growth in construction and development. However, it would complement policies SI1 Improving air quality, G5 Urban greening and D7 Public realm that support environmental protection and the reduction in airborne pollutant. Biodiversity and promotion of community health and wellbeing.

#### Recommendations

It was recommended that further information is provided on how wooded areas could be used and clarification on the target size of woodland areas and appropriate locations. It was also recommended that the policy should provide further reference to accessibility and inclusive design, and connections between existing sites and how sites will be managed.

### GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide the target of the amount of trees and woodland, however the GLA advised that the location of trees was more a local issue to be determined by the boroughs.

The GLA also advise that other policies in the London Plan addressed issues such as inclusive design and connectivity of green infrastructure raised by the recommendations.

### Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 118: G7 Trees and woodlands

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		O	n/a	O	n/a	n/a	O	O	O	O	+	O	+	O	O	n/a	+
Medium Term						n/a	+		+	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+	+	n/a	+
Long Term						n/a	++		+	n/a	+	n/a	n/a	+	+	+	+	+	+	++	+	+	n/a	+
Direct / Indirect						n/a	I/D		I/D	n/a	I	n/a	n/a	I/D	I/D	I	I	I/D	I/D	D	I/D	D	n/a	I
Temporary / Permanent						n/a	T/P		T/P	n/a	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	n/a	L/GL	n/a	n/a	L	L	L/GL	L/GL	L/GL /W	L	L	L/GL	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	O	O		O	n/a	O	O	O	O	n/a	O
Medium Term	+	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	O	O		O	n/a	+	+	+	+	n/a	+
Long Term	+	+	+	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	n/a	+	++	+	+	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	D	D		D	n/a	D	I	I	D	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/GL		L/GL	n/a	L/GL	L/GL /W	L/GL /W	L/GL	n/a	L/GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				O	O		n/a	O		+	n/a	n/a		O
Medium Term	+	+	+		n/a				n/a	n/a				+	+		n/a	+		+	n/a	n/a		+
Long Term	+	+	+		n/a				n/a	n/a				+	+		n/a	+		++	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				n/a	n/a				D	I		n/a	D		D	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	T/P		n/a	T/P		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				L/GL	L		n/a	L/GL /W		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				+																				
Medium Term				+																				
Long Term				+																				
Direct / Indirect				D							D													
Temporary / Permanent				T/P							P													
Local / Greater London / Wider Region / Global				L/GL							L/GL													

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.7.8 G8 Food Growing

### Policy description

This policy supports the protection of existing allotments and the provision of spaces for community gardening, including food growing, within new developments. It also identifies the need to increase commercial food production in London.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy supports a range of measures which deliver health and wellbeing benefits across London. By encouraging food growth in allotments and gardens, this policy would facilitate healthier, more active lifestyles and support social integration and community cohesion. Allotments and community gardens can also help to increase education and awareness about healthier food and food sources. This policy also encourages gardens within schools, increasing education in school-age children, supporting healthier life choices from an early age.

Large-scale, commercial food production in London could help to increase the city's self-sufficiency and reduce associated transportation and freight costs when importing foods, offering potentially significant economic savings. At a local level, growing food can result in significant personal savings and reduce the cost of weekly food shops.

The growing of food commercially and locally would offer benefits to the local environment, increasing London's natural capital and supporting the city's biodiversity. Recommended techniques, such as green walls and roofs, can bring natural elements to the most built up parts of the city and improve the look and feel of an area thereby increasing positive feelings within the community. Reducing the transport of food, through commercial production, would facilitate improvements to local air quality and associated climate change impacts by reducing emissions from freight transport. Similarly, these natural areas could help to mitigate the effects of surface run off and ground water discharge by increasing the interception of water and improved soil stability.

#### Cumulative

This policy aligns with policies S1 Developing London's social infrastructure and G4 Local green and open space which support social integration and ensuring healthier food and resources for Londoners.

#### Recommendations

It was recommended that further information be provided on inclusive access to allotments. Targets for the provision of community gardening could be specified and the use of allotments and green roofs in offices, in addition to schools, could also be suggested.

### GLA response

No changes were proposed to be made to the draft policy and the GLA advised that the design and location of would be implemented through borough plans.

### Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 119: G8 Healthy Food

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		n/a	+	n/a	+	n/a	O	O	O	n/a	n/a	+	+	n/a	+	n/a	+
Medium Term						+	+		n/a	+	n/a	+	n/a	+	O	O	n/a	n/a	+	+	n/a	+	n/a	+
Long Term						+	+		n/a	++	n/a	+	n/a	+	+	+	n/a	n/a	+	++	n/a	+	n/a	+
Direct / Indirect						I/D	I/D		n/a	I/D	n/a	I/D	n/a	I	I/D	I	n/a	n/a	I/D	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	P	n/a	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	L/GL	n/a	L/GL	n/a	L	L	L/GL	n/a	n/a	L/GL /W	L/GL /W	n/a	L/GL	n/a	L
<b>EQIA</b>																								
Short Term	n/a	+	+	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term	n/a	+	++	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term	n/a	+	++	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	++	n/a	+	n/a	n/a
Direct / Indirect	n/a	D	D	n/a	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	n/a	n/a	n/a		n/a	n/a	n/a	I	n/a	I/D	n/a	n/a
Temporary / Permanent	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	L/GL /W	L	n/a	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	L/GL	n/a	n/a	n/a		n/a	n/a	n/a	L/GL /W	n/a	L/GL	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	?				O	n/a		O	+		+/?	n/a	+		+
Medium Term	+	+	++		n/a				n/a	?				O	n/a		O	+		+/?	n/a	+		+
Long Term	+	+	++		n/a				n/a	?				+	n/a		O	+		+/?	n/a	+		+
Direct / Indirect	D	D	D		n/a				n/a	I/D				I	n/a		I	D		I	n/a	I/D		I
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	T/P				T/P	n/a		T	P		T/P	n/a	T/P		T/P
Local / Greater London / Wider Region / Global	L/GL /W	L	L		n/a				n/a	L/GL				L	n/a		L/GL	L/GL /W		L/GL /W	n/a	L/GL		L/GL
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.7.9 G9 Geodiversity

### Policy description

The policy supports the protection and enhancement of London's geodiversity (both locally and regionally important sites). It also supports the promotion and appreciation of geodiversity through increased public access to geodiversity.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy ensures important geodiversity sites are protected. This would support the creation of better quality open space which can increase positive feelings about the local area and improve the usability of these areas. This policy supports increasing accessibility to these sites where appropriate, and increasing the appreciation of geodiversity, which can deliver wider benefits including environmental education and spaces for physical exercise and mindfulness activities. Depending on the level of protection and use of these sites, the provision of footpaths could also help to facilitate more active forms of transport, improving wider connectivity between communities.

The protection of London's geodiversity would facilitate a number of improvements to the local environment, supporting the provision of green, open areas, which provide quieter and cleaner spaces, reducing poor air quality and noise in the locality. However, the protection and expansion of these protected areas would reduce land available for the delivery of physical infrastructure and new housing, limiting housing and industry growth and the ease at which housing-need can be met.

The protection of geodiversity ensures the retention of soil stability and the filtering of water, which can impact local water quality. Objectives related to the historic environment and climate change would be positively affected, as the geological record reveals how past environment responded to broadly comparable climate changes. By protecting geodiversity, it would provide insight into the impacts of climate change and help the city prepare and adapt to changes.

#### Cumulative

Potential cumulative effects of implementing the policy include conflict with policies SD1 Opportunity Areas, H1 Increasing housing supply and E11 Sector growth opportunities and spatial clusters which encourage growth of construction, development and land take. Implementation of the policy could complement policies G4 Local green and open space, H10 Redeveloping existing housing and Estate Regeneration and D7 Public realm that support protection of open space for active lifestyles.

#### Recommendations

It was recommended that further information be provided on how protected areas of geodiversity could be used and maintained, and whether there are target sizes and proposed location for the sites. It was also recommended that the supporting text was expanded to reference how geodiversity sites should be recognised for their importance in providing habitats for biodiversity and in allowing delivery of ecosystem services.

### GLA response

No changes were proposed to be made to the draft policy, although amendments made to the supporting text to provide reference to ecosystems services and the importance in providing habitats for biodiversity.

The GLA advised that it more appropriate for further information and clarification on the target size, their location and possible use would be more appropriate to be provided by boroughs through local plans and not the London Plan.

### Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Table 120: G9 Geodiversity

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		+	n/a	O	O	n/a	O	+	O	n/a	+	n/a	+	O	O	n/a	+
Medium Term						n/a	+		+	n/a	-	O	n/a	+	+	+	n/a	+	n/a	+	O	O	n/a	+
Long Term						n/a	+		+	n/a	-	+	n/a	+	+	+	n/a	+	n/a	++	O	O	n/a	+
Direct / Indirect						n/a	I/D		I/D	n/a	I	I/D	n/a	I	I/D	I	n/a	I/D	n/a	I	D	I/D	n/a	I
Temporary / Permanent						n/a	T/P		T/P	n/a	P	P	n/a	T/P	T/P	T/P	n/a	T/P	n/a	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	n/a	L/GL	L/GL/W	n/a	L	L	L/GL	n/a	L/GL/W	n/a	L/GL/W	L/GL/W	L	n/a	L
<b>EQIA</b>																								
Short Term	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	+	?	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	+	?	n/a	n/a
Long Term	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	++	+	?	n/a	n/a
Direct / Indirect	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I	I	I	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/GL/W	L/GL/W	L/GL/W	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		-				?	n/a				O	n/a		O	+		+/?	+	?		+
Medium Term	+	+	+		-				?	n/a				O	n/a		O	+		+/?	+	?		+
Long Term	+	+	+		-				?	n/a				+	n/a		O	+		+/?	+	?		+
Direct / Indirect	I/D	D	D		I				D	n/a				I	n/a		I	D		I	I	I		I
Temporary / Permanent	T/P	T/P	T/P		T/P				P	n/a				T/P	n/a		T	P		T/P	T/P	T/P		T/P
Local / Greater London / Wider Region / Global	L/GL/W	L	L		L/GL/W				L/GL	n/a				L	n/a		L/GL	L/GL/W		L/GL/W	L/GL/W	L		L/GL
<b>CSIA</b>																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8 Sustainable Infrastructure

### 9.8.1 SI1 Improving air quality

#### Policy description

The policy supports improvements to London's air quality and exposure to poor air quality, especially for vulnerable people, is reduced. All developments should propose methods which achieve either Air Quality Positive or Neutral outcomes depending on their scale. Where developments are unable to reduce emissions on-site, measures should be put in place elsewhere which deliver equivalent air quality benefits.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Poor air quality is not evenly distributed across London, and more vulnerable communities are often disproportionately affected by air quality impacts. Improvements to London's air quality would therefore help to improve the health of the population, particularly vulnerable groups such as young children, elderly people and those with respiratory conditions. Improvements to health would also facilitate wider economic benefits by reducing healthcare costs associated with treating respiratory conditions and premature deaths.

Improvements to localised air quality would help to alleviate the impacts of climate change and the heat island effect in London. This would be achieved through the use of air quality assessments, air quality focus areas, low emission zones, air quality buffer zones and promotion of green infrastructure. This support for green infrastructure and open space would also help to protect habitats and species and improve London's natural capital. Green infrastructure and low emission zones would also promote an increase in energy efficiency in buildings, by using natural materials to cool buildings. This urban greening also has the potential to help improve the local character of an area and bring natural elements to the most built up and polluted areas of London.

##### Cumulative

This policy would complement policies T2 Healthy streets, T1 Strategic approach to transport T9 Funding transport infrastructure through planning and G7 Trees and woodland which relate to efficient transport and the promotion of active travel.

##### Recommendations

It was recommended that further information is provided on how current air quality can be improved and existing developments could be retrofitted to include design features which mitigate the effects of poor air quality (i.e. green infrastructure, sustainable transport, air handling systems).

It was also recommended that further information is added on the impact that transport would have on the viability of infrastructure projects in London. It was recommended that text is provided with regards to how air quality focus areas and buffer zones have been categorised and the building restrictions, monitoring and management techniques which should be adopted within them to ensure they meet emission requirements.

#### GLA response

Additional supporting text was included which clarifies the requirements of the air quality focus areas and buffer zones. The policy text was amended to clarify that the policy applies only to new developments and that the retrofitting and management of existing assets will be addressed through the London Environment Strategy and the Mayor's Transport Strategy.

#### Appraisal of finalised policy

In addition to the above, the policy will address how the different air quality management areas (e.g. air quality focus areas, buffer zones, ultra-low emission zones) have been defined and categorised. The policy will only make reference to mitigation strategies for new developments as these are the ones that it has primary control over.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Whilst this improvement in air quality is driven primarily by human health considerations, an improvement in air quality through reductions in NO<sub>x</sub> concentrations will have a positive impact on levels of atmospheric pollution at European designated sites.

Table 121: SII Improving air quality

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		?	+	n/a	n/a	n/a	+	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Medium Term						n/a	n/a		?	+	n/a	n/a	n/a	+	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Long Term						n/a	n/a		?	++	n/a	n/a	n/a	++	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Direct / Indirect						n/a	n/a		D	I	n/a	n/a	n/a	D	D	D	I	n/a	n/a	I	n/a	n/a	I	n/a
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		L	L/ GL	n/a	n/a	n/a	L/ GL /W	L/ GL /W	L/ GL /W	L/ GL	n/a	n/a	L/ GL	n/a	n/a	L	n/a
<b>EQIA</b>																								
Short Term	?	?	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	O		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	++	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	++	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D		n/a	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/ GL /W		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a				+	O		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				+	O		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	++		n/a				n/a	n/a				+	O		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				D	D		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				L/ GL /W	L/ GL /W		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.2 SI2 Minimising greenhouse gas emissions

### Policy description

This policy supports the aspiration for major developments to be zero carbon and for emissions to be minimised through construction and operation. This would be achieved through the development of comprehensive energy strategies, the incorporation of energy efficiency measures which surpass the requirements of Building Regulations and the establishment of carbon offset funds.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would facilitate the development of energy efficient buildings. Increased energy efficiency of new homes, and retrospective improvements of existing homes, would help to reduce fuel cost and the risk of fuel poverty by making homes cheaper to run. More efficient developments would therefore contribute to improvements in local air quality and contribute to climate change mitigation and adaptation.

The adoption of appropriate energy management and monitoring systems, including the installation of innovative and affordable renewable energy generation systems and storage, would result in reduced energy consumption and associated greenhouse gases, and would help to reduce the heat island effect in London. This reduced energy consumption and increased resilience to climate change would have economic benefits across the capital, reducing heating and cooling costs and costs associated with managing more extreme weather.

This policy may require some retrofitting of existing buildings, for example through conversions, which could impact on the historical value of some older buildings. The impacts are likely to be short term and dependent on local context and the scale of the intervention necessary.

#### Cumulative

The policy complements policies S2 Health and social care facilities, S11 Improving air quality, E9 Skills and opportunities for all and G6 Biodiversity and access to nature which support the reduction of airborne pollutants and climate change mitigation. Furthermore, the combination of policies support the provision of healthy active lifestyles, which is an equal opportunity to all Londoners.

#### Recommendations

It was recommended that further information be provided with regards to carbon off-setting funds. It was also recommended that this policy could cover transport and how sustainable transport options could contribute to reducing greenhouse gases.

An additional recommendation to provide information on the specific details of policies around climate change adaptation and mitigation was made, for example how net zero carbon would be achieved.

### GLA response

Minor changes to the draft policy were made. The GLA advised that the availability and appropriateness of carbon off-set funds will be determined by local planning authorities with the GLA providing further specific guidance on off-setting.

The GLA also advised that other policies in the Plan covered recommendations such as sustainable transport options. The GLA further advised that details regarding specific climate change policies would be contained in a number of guidance documents produced by the GLA, which will be updated more regularly than the London Plan. Any submitted energy assessment is reviewed by GLA officers to determine whether onsite measures have been maximised.

The GLA removed the statement relating to the impacts on local air quality as a result of reducing greenhouse gas emissions, as air quality is comprehensively covered in Policy S11.

### Appraisal of finalised policy

No further appraisal is required as no significant changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy provides a positive environmental commitment. There are no adverse impact pathways present.

Table 122: SI2 Minimising greenhouse gas emissions

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	O	-	n/a	n/a	n/a
Medium Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	O	?	n/a	n/a	n/a
Long Term						?	+		?	+	+	n/a	n/a	?	++	++	++	n/a	n/a	+	?	n/a	n/a	n/a
Direct / Indirect						D	D		D	I	I	n/a	n/a	I	D	D	D	n/a	n/a	D	D	n/a	n/a	n/a
Temporary / Permanent						P	P		T/P	P	P	n/a	n/a	T/P	T/P	P	P	n/a	n/a	P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/GL /W	L	L	n/a	n/a	L/ GL	W	L/ GL	L/ GL	n/a	n/a	W	L/ GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	O	O	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	D	n/a	n/a	I	n/a	n/a	n/a	n/a	I	n/a	n/a	I	I		D	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	n/a	T/P	T/P		P	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	n/a	n/a	L	n/a	n/a	n/a	n/a	L	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		+				n/a	n/a				O	O		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				O	O		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				O	O		++	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		D				n/a	n/a				I	I		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T		P				n/a	n/a				T/P	T/P		P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L	L/ GL		L/ GL	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.8.3 SI3 Energy infrastructure

#### Policy description

This policy supports the aspiration for boroughs and developers to engage with energy companies early on in the design process to identify future energy requirements arising from large scale developments and planning the energy infrastructure accordingly. Any large-scale development should be designed with an Energy Masterplan which identifies current energy capacity and potential future energy provision.

This policy also aims to promote the adoption of communal heating systems, which follow the heating hierarchy, within Heat Network Priority areas.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

This policy supports the adoption of less polluting energy techniques, promoting low carbon and renewable energy sources. This policy outlines the need to identify and establish future energy needs in opportunity areas, town centres and other significant developments to build resilience and ensure capacity is managed. Energy masterplans offer a number of benefits, ensuring opportunities for energy efficiency in new developments are identified at the early stages. These masterplans include a number of important measures such as the utilisation of energy from waste schemes, improving London's waste management control, and the use of communal heat networks to provide energy in a more efficient, and potentially cost-effective way. The policy also supports improvements to existing infrastructure, increasing resilience further and reducing waste and leaks. This improved efficiency and potential cost savings outlined in this policy would therefore help to improve London's economic growth and increase resilience within the economy.

The adoption of more sustainable supplies of energy would result in many environmental benefits. It would help to improve local air quality and improve climate change adaptation and mitigation by reducing associated emissions and waste. This would consequently have a number of social benefits, reducing issues such as ill-health caused by poor air quality and the risk of fuel poverty caused by energy inefficiency in homes.

##### Cumulative

This policy complements policies G4 Local green and open space and SI4 Managing heat risk, which collectively could increase energy efficiency and mitigate against the social and environmental effects of energy production and consumption.

##### Recommendations

It was recommended that information was provided on the affordability of energy and its contribution to developing inclusive communities. In addition, it was recommended that the benefits and potential cost implications of heat networks for consumers were highlighted.

It was also recommended that further detail was provided on how the adoption of cleaner energy generation will be encouraged and incentivised.

#### GLA response

Additional text was added which references the CIBSE code of practice, which details how heat networks should be specified to be efficient and cost-effective for occupiers. This policy was also

amended to include reference to the London Environment Strategy which contains further details on initiatives which support the implementation of low carbon energy generation.

#### Appraisal of finalised policy

In addition to the above, this policy would address how district heat networks should be designed to be efficient and cost-effective ensuring good value for its customers. The policy would make reference to the recommendations made in the London Environment Strategy on the implementation of low carbon energy generation. This does not change the overall assessment outcomes, but adds further clarity.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy promotes the development of London's energy system, but does not specifically identify any location, or type of energy related development. Dependent on the location or type of development, potential impact pathways could exist (such as changes in hydrology, disturbance from construction/ operational activities, interrupting flight lines), however this policy does not provide specifically for any location or type of development. Moreover, it also has positive air quality dimensions regarding reduction of NOx emissions. As such there are no impact pathways present.

Table 123: SI3 Energy infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	?		n/a	+	+	n/a	n/a	O	?	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						n/a	?		n/a	+	+	n/a	n/a	O	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						n/a	?		n/a	+	+	n/a	n/a	+	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						n/a	D		n/a	D	I	n/a	n/a	I	D	I	D	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						n/a	P		n/a	P	T/P	n/a	n/a	T/P	P	T/P	P	n/a	n/a	n/a	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		n/a	L	L	n/a	n/a	L	L/GL	L	L/GL	n/a	n/a	n/a	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	O	?		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	O	?		++	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	I	D		D	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P	P		P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L	L/GL		L/GL/W	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				O	?		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				O	?		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				+	?		+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				I	D		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				T/P	P		T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L				n/a	n/a				L	L/GL		L	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.4 SI4 Managing heat risk

### Policy description

The policy aims to minimise heat gains of new developments through their design, layout, orientation and materials. Energy strategies should be produced for all major developments which demonstrate how the cooling hierarchy has been incorporated into the design to minimise the potential for overheating and reliance on air conditioning systems.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would encourage new developments to be designed and constructed to ensure they have the ability to cope with elevated temperatures and include an adequate provision of cooling and ventilation. This would minimise the urban heat island effect and overheating, which can have adverse health effect, particularly on higher risk groups such as young children, older people, and those with existing health conditions.

The policy promotes temperature regulation through high quality design, including ventilation, insulation, shading, green infrastructure and orientation. These features would increase energy efficiency by shading buildings with natural materials, and would support climate change adaptation and mitigation. The use of features such as green infrastructure would also increase biodiversity and natural capital across the city, even in the most built up areas.

#### Cumulative

Implementation of the policy could complement policies E2 Low cost business space and D3 Inclusive design which support and encourage developments with incorporated heat risk design to reduce energy consumption and increase efficiency.

#### Recommendations

It was recommended that further information is provided on how existing buildings could be retrofitted to avoid overheating and minimise the impacts of elevated temperatures.

### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that that it is more appropriate for further information and clarification to be provided by the London Environment Strategy (for example retrofitting of existing buildings) and by boroughs through local plans.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present.

Table 124: SI4 Managing heat risk

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		n/a	+	O	n/a	n/a	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term						n/a	+		n/a	+	O	n/a	n/a	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term						n/a	+		n/a	+	O	n/a	n/a	+	++	++	++	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	I		n/a	I	I	n/a	n/a	I	D	D	D	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	P		n/a	P	P	n/a	n/a	P	P	P	P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		n/a	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	+	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+		+	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+		+	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	++	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	++		++	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I	n/a	I	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I	D		D	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	P	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P		P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		?				n/a	n/a				?	+		+	n/a		+	n/a	n/a		n/a
Medium Term	n/a	n/a	+		?				n/a	n/a				?	+		+	n/a		+	n/a	n/a		n/a
Long Term	n/a	n/a	++		?				n/a	n/a				?	++		++	n/a		++	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		D				n/a	n/a				I	D		D	n/a		I	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	P		P				n/a	n/a				P	P		P	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		L/ GL				n/a	n/a				L/ GL	L/ GL		L/ GL	n/a		L/ GL	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.5 SI5 Water infrastructure

### Policy description

The policy ensures that water supplies and resources are protected and conserved in a sustainable manner which minimises the use of mains water and reduces leakage levels. The policy also supports investment in water supply infrastructure and waste water treatment infrastructure with the aim of protecting water quality and the water environment.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Investment in water infrastructure, including smart metering, the replacement of ageing infrastructure and the adoption of circular economy practices, would all contribute to efficient and secure water management. This would improve London's resilience to future climate change, in addition to cost-savings associated with reducing water leakages and improved efficiency.

By ensuring new developments are designed with adequate water capacity and no micro-connections between foul and surface water networks, the risk of leakages and pollution would be managed, facilitating improvements to water quality within river tributaries. Improvements to water which flows through London's public spaces and parks could help to protect the local flora and fauna and ensure these spaces remain healthy, attractive and safe.

#### Cumulative

This policy aligns with policies SI4 Managing heat risk and G9 Geodiversity which support the protection of geodiversity and managing heat risk. Water supplies rely upon geological traits and local temperature, which effect evaporation rates, to protect and conserve water supplies. The combined conservation of water supplies through these policies will help protect the overall water environment.

#### Recommendations

It was recommended that further information is provided on opportunities for retrofitting of existing developments with water infrastructure to make them more water efficient. It was also recommended that additional information is inserted into the policy which describes the types of 'corrective actions' which could be used to improve water quality within the tributaries and how pollution to these tributaries will be minimised in the future.

It was also recommended that although the policy highlighted that tributary pollution is a significant threat, it was unclear how it will be reduced.

### GLA response

The GLA clarified wording in relation to the types of 'corrective action' that might be used to improve water quality, however advised that further details would be found in the Mayor's environment Strategy. The GLA further advised that in respect of retrofitting of existing buildings, this again was dealt with the Mayor's Environment Strategy.

In relation to the pollution of tributaries, the GLA advised that this is a maintenance/management issue and therefore more appropriate for the Environment Agency and the River Basin Management Plan to address.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy that aims to conserve and protect water resources in a sustainable manner. It provides for new residential development to minimise use of mains water, thus reducing pressure upon water resources in the natural environment that may interact with European designated sites.

This policy also promotes the improvement of water quality and the water environment, which could also have a positive impact upon hydrologically connected European designated sites. This policy provides for 'sustainable' waste water treatment infrastructure, which by definition would not have an adverse impact upon European designated sites. This includes future proofing development so that future misconnections between foul and surface water networks are not easily created.

Table 125: SI5 Water infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a
Long Term						n/a	n/a		n/a	+	++	n/a	n/a	n/a	+	n/a	n/a	++	++	+	n/a	n/a	+	n/a
Direct / Indirect						n/a	n/a		n/a	I	I	n/a	n/a	n/a	I	n/a	n/a	D	D	D	n/a	n/a	D	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/GL /W	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	L	L	n/a	n/a	L/ GL	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+		?	+	+	+	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+		?	+	+	+	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a	n/a	n/a	+		?	+	++	+	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D		I/D	D	I	I	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L/ GL		L/ GL	L/ GL	L/ GL	L	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	?		n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	?		n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	?		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	D		D	n/a	I		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	T/P		T/P	n/a	T/P		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	L/ GL		L	n/a	L		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.6 SI6 Digital connectivity

### Policy description

This policy encourages greater digital connectivity and ensure London's global competitiveness now and in the future through the appropriate provision of digital infrastructure in developments and public realm design. It also supports the extension and enhancement of mobile digital infrastructure to provide improvements in mobile connectivity both within developments and surrounding areas.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy supports affordable and accessible digital infrastructure, to encourage a culture of equality in future service provision, ensuring all Londoners can actively participate in the wider opportunities the city has to offer. Good quality digital infrastructure can increase access to important information sources including job opportunities, health advice, education and learning, shopping and leisure activities. For less mobile individuals, digital connectivity can be particularly important as it increases access to services and support which may be difficult to access physically.

Implementation of this policy would support a productive and resilient economy which could accommodate increasing connectivity for public and private sectors and drive economic activity in the 21<sup>st</sup> Century. Increasing access to digital infrastructure and services also has the ability to encourage regeneration and associated economic opportunities, such as business growth and job creation. As part of improving London's overall resilience, this policy also considers the need for secure digital infrastructure, particularly in commercial terms.

Improved access to digital data and services can also improve other sectors which rely on internet connectivity, such as education, or those which can be enhanced by better use of digital data and services, such as cultural or historic sites. This policy could also indirectly support the development of innovative technologies which could contribute to improved management in industries, such as waste management or air quality monitoring.

#### Cumulative

The policy complements policies T2 Healthy streets, S1 Developing London's social infrastructure, HC5 Supporting London's cultural and creative industries and G4 Local green and open space which support the promotion of equal participation and social inclusion. Additionally, the policy could support the development of innovative technologies and creative industries that boost economic growth within London.

#### Recommendations

It was recommended that further information be provided on the potential for high quality and secure digital infrastructure to promote regeneration opportunities. It was also recommended that it is clarified that the policy does not directly ensure good connectivity but instead provides the infrastructure for service providers to use.

### GLA response

No changes are proposed to be made to the draft policy, although amendments were made to the supporting text to regenerative opportunities of the provision of high quality and secure digital infrastructure. The GLA also clarify that the service providers are responsible for delivering connectivity across the city and the policy represents what planning is able to do about the issue.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant impacts. The policy could be positive for European sites. Providing increased digital infrastructure, could increase remote networking opportunities (e.g. video conferencing and file sharing) and thus reduce the need for the number of journeys for work.

Table 126: S6 Digital Connectivity

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	?		n/a	+	+	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Medium Term						n/a	?		n/a	+	+	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Long Term						n/a	?		n/a	+	++	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Direct / Indirect						n/a	I		n/a	D	D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a
Temporary / Permanent						n/a	T/P		n/a	P	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	P	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL/W		n/a	L/GL/W	L/GL/W	L/GL/W	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	n/a	?	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	+	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	+	n/a	+	n/a	n/a	+	+	++	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I	I	n/a	I	n/a	n/a	I	I	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	P	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L	L/GL/W	n/a	L/GL/W	n/a	n/a	L	L	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				O					n/a															
Medium Term				O					n/a															
Long Term				O					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL/W					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.8.7 SI7 Reducing waste and supporting the circular economy

### Policy description

This policy supports the adoption of the waste hierarchy whereby the volume of waste is reduced and the levels of re-use and recycling are maximised. This will be achieved through the promotion of the Circular Economy model which improves resource efficiency and innovation so materials can be kept at their highest use for as long as possible.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy would facilitate the preparation of Circular Economy Statements for strategic developments which will detail how waste will be minimised, managed and sorted. Circular Economy Statements of this kind would help to reduce the environmental impact of high density developments by considering the end of life potential of buildings and the inherent value of demolition materials. The policy therefore encourages a reduction in waste generation and maximises re-use. This reduction would result in less vehicles required to transport raw materials and waste, which would positively impact local air quality by reducing associated carbon emissions and reduce local noise disturbance associated with transport and waste processing.

This policy would positively contribute to the local economy as it contains a variety of measures which help facilitate London's productivity and economic resilience, whilst supporting the adoption of business practices which reduce the costs, emissions and in-direct impacts (e.g. pollution) of raw material extractions and consumption.

#### Cumulative

This policy aligns with policies SI3 Energy infrastructure, D3 Inclusive design and SI9 Safe guarding waste sites which collectively support a change in waste management from a linear to circular economy. Additionally, the policies could reduce business costs, increase efficiency and provide economic growth options.

#### Recommendations

It was recommended that further information was provided on the design implications associated with efficient waste management both for new developments and existing buildings. It was also recommended that additional information be provided on how the adoption of Circular Economy principles could impact SMEs and how it could be incentivised to ensure it is adopted across multiple sectors.

It was recommended that further guidance is provided on how Circular Economy Statements would be implemented and practical examples of how the waste management and monitoring requirements of them could be implemented.

### GLA response

No changes to the draft policy were made, although amendments were made to the supporting text to provide additional guidance. The GLA identified that it was more appropriate for further information and clarification to be provided by individual Boroughs and through the London Environment Strategy and not the London Plan.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive and provides for a reduction in waste and improves resource efficiency. This has potential to reduce resource use such as water and energy and thus reduce atmospheric pollution contributions. There are no adverse impact pathways present.

Table 127: SI7 Reducing waste and supporting the circular economy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	++	?/+
Temporary / Permanent						n/a	I		I/D	I/D	n/a	n/a	n/a	D	I	I	D	n/a	n/a	n/a	n/a	I	D	D
Direct / Indirect						n/a	P		T	P	n/a	n/a	n/a	P	P	P	P	n/a	n/a	n/a	n/a	P	P	P
Local / Greater London / Wider Region / Global						n/a	L		L	L/GL	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	++
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	P	n/a	P	n/a	P	P		P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L/GL	n/a	L/GL	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				?	O		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				?	O		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				?	O		?/+	n/a		n/a	n/a	n/a		?/+
Temporary / Permanent	n/a	n/a	I		n/a				n/a	n/a				D	I		I	n/a		n/a	n/a	n/a		D
Direct / Indirect	n/a	n/a	P		n/a				n/a	n/a				P	P		T/P	n/a		n/a	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.8 SI8 Waste capacity and net waste self-sufficiency

### Policy description

This policy ensures existing waste management provisions are safeguarded and optimised with the aspiration of London becoming net self-sufficient, in terms of waste, by 2026. This will be achieved by encouraging the installation of a variety of processing facilities, the adoption of Circular Economy principles and energy from waste schemes. It also encourages all new developments and waste sites to adopt carbon efficient waste management practices which provide additional environmental, social and economic benefits.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy supports London become a more self-sufficient city, in terms of waste management. This action would help to build resilience in the London economy, reducing costs associated with the transport and management of waste elsewhere and reducing the reliance on others. Additionally, the development of new waste management sites, and the intensification of existing ones, would support job creation, skills, training and apprenticeship opportunities.

Environmental benefits would be gained from the implementation of this policy, reducing the impacts waste management facilities have on surrounding areas by increasing appropriate and more efficient waste management, including reducing vehicle movements. This could also facilitate improvements in local air quality and reductions in nuisance noise, both of which can have negative health implications. Additionally, the policy contributes to renewable energy generation and reductions in greenhouse gas emissions from waste processing and associated transport.

#### Cumulative

This policy would complement policies H11 Ensuring the best use of stock and D6 Optimising housing density which support re-using existing brownfield land for industrial and housing locations that could limit construction and household waste through maximising existing waste networks.

#### Recommendations

It was recommended that additional information is provided on the sustainable transport of waste, in particular the adverse health effects of emissions to vulnerable populations. It was also recommended that additional information is provided on how noise impacts could be mitigated. These could include restrictions on operating hours, appropriate road surfaces and innovative waste processing techniques.

### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity.

The GLA advised that other policies, such as noise, agent of change and freight, addressed other recommendations. The GLA also advised that it was more appropriate for further information and clarification to be provided by the boroughs through local plans and based on site-specific detail such as open hours.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy aims for net self-sufficiency by 2026 and includes for new waste management sites where required, which should reduce the need for waste to be exported out of London for processing.

Table 128: SI8 Waste capacity and net waste self-sufficiency

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	++	?/+
Direct / Indirect						n/a	I		I/D	I/D	n/a	n/a	n/a	D	I	I	D	n/a	n/a	n/a	n/a	I	D	D
Temporary / Permanent						n/a	P		T	P	n/a	n/a	n/a	P	P	P	P	n/a	n/a	n/a	n/a	P	P	P
Local / Greater London / Wider Region / Global						n/a	L		L	L/ GL	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
<b>EQIA</b>																								
Short Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	++
Temporary / Permanent	n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	P	n/a	P	n/a	P	P		P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	n/a	n/a	L	n/a	n/a	L/ GL	n/a	L/ GL	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				D	I		I	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				P	P		T/ P	n/a		n/a	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.8.9 SI9 Safeguarded waste sites

#### Policy description

This policy ensures that existing waste management sites are safeguarded and adequate compensatory capacity is made where facilities are lost. It also seeks to ensure that any waste facilities located in areas of non-waste related developments should be integrated with other functions to deliver local benefits.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would support efforts to make London more self-sufficient in managing its own waste. This would help to reduce vehicle movements in the waste management process, facilitating improvements to local air quality and reducing nuisance noise. Poor air quality and excess noise can have negative health and wellbeing implications, and therefore this improved efficiency offers wider social benefits.

This policy protects existing sites within London to ensure that waste capacity is managed across the capital. This increase in self-sufficiency builds resilience in the economy, reducing transport costs and reducing the reliance on others to manage waste appropriately and efficiently. This policy does not prohibit the release of these sites for other uses, such as for industry or housing, but does ensure that if this occurs, the capacity of waste management remains sufficient.

##### Cumulative

This policy complements the policy SI3 Energy infrastructure which supports the development of energy infrastructure that could safeguard waste sites by the delivery of energy from waste incinerators. Additionally, policy SI7 Reducing waste and supporting the circular economy could complement this policy as it supports the reduction in waste which waste sites rely upon for income. Therefore, compensatory capacity is more likely to be provided to waste sites. Additionally, the policy, in combination with SI7 and SI8, contributes to renewable energy generation and reductions in greenhouse gas emissions from improved waste processing techniques and associated sustainable transport patterns.

##### Recommendations

It was recommended that further information be provided on how the safeguarding and re-provision of waste capacity could be strategically located to support growth locations across London.

#### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance.

The GLA consider that it was more appropriate for further information and clarification to be provided by the boroughs through local plans and not the London Plan. Other policies also cover some detail, for example industrial locations are covered in Policy SI5.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no impact pathways present.

Table 129: SI9 Safeguarded waste sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	O/+	O/+	O/+	n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	O/+	O/+	O/+	n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Long Term						n/a	n/a		n/a	+	+	n/a	n/a	O/+	O/+	O/+	n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Direct / Indirect						n/a	n/a		n/a	I/D	I/D	n/a	n/a	I/D	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	D	D
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	?/+	n/a	n/a	O/+	O/+		n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Medium Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	?/+	n/a	n/a	O/+	O/+		n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Long Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	?/+	n/a	n/a	O/+	O/+		n/a	n/a	n/a	n/a	n/a	n/a	?	?/-
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D	I	n/a	n/a	I/D	I/D		n/a	n/a	n/a	n/a	n/a	n/a	D	D
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P	T/P	n/a	n/a	T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL		n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				O	O		n/a	n/a		n/a	n/a	n/a		?/-
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				O	O		n/a	n/a		n/a	n/a	n/a		?/-
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				O	O		n/a	n/a		n/a	n/a	n/a		?/-
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a		D
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L/ GL	L/ GL		n/a	n/a		n/a	n/a	n/a		L/ GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.10 SI10 Aggregates

### Policy description

The policy ensures the adequate supply of sustainably sourced aggregate to support construction in London. This will include encouraging the re-use and recycling of construction material and its transportation by sustainable transport modes. Where aggregate extraction is required, where ever possible, this would be within London and would ensure local plans are in place to mitigate the environmental and infrastructure impacts associated with extraction.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy supports the sustainable use of locally-sourced aggregate material across London. This would ensure the delivery of material for new development, facilitating growth the delivery of important physical infrastructure, such as housing or industry units.

Implementation of this policy would ensure the use of more sustainable transport modes to move aggregate through the city. A reduction in land-based vehicle movements would result in improved local air quality, reductions in localised noise generation and minimise carbon emissions. Poor air quality and excess noise can have negative health and wellbeing implications, and therefore this improved efficiency offers wider social benefits.

This policy sets out a target of 95% re-use and recycling of construction, demolition and excavation materials by 2020. This would reduce the overall volume of waste sent for disposal and follows the principles of the Circular Economy. This would be a more cost-effective method of managing waste by reducing costs associated with transport, waste disposal and resource provision.

This policy also has the potential to provide wider environmental benefits through the use of planning conditions to support the aftercare of aggregate extraction sites, which could include methods such as the installation of green infrastructure and the protection of biodiversity.

#### Cumulative

This policy aligns with policies H1 Increasing housing supply, S1 Developing London's social infrastructure, E11 Sector growth opportunities and spatial clusters and T9 Funding transport infrastructure through planning which support the delivery of development and require local sustainably sourced aggregates for construction.

#### Recommendations

It was recommended that further information was provided on the types of aftercare that could be promoted through planning conditions. It was also recommended that additional information is provided on the level of processing required to beneficially re-use demolition, excavation and construction waste and any associated environmental impacts on air quality, noise generation and carbon emissions which could arise as a result of this. Mitigation measures for these impacts will be assessed by local boroughs taking into account site-specific and local conditions.

### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity. The GLA advised that it was more appropriate for further

information and clarification to be provided by borough through local plans on the recommendations. Specifically, mitigation would depend on local site specific circumstances.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive in that it explicitly directs movement of aggregates to be by sustainable transport modes where possible, which would reduce the number of HGV movements involved. This is particularly relevant for London Borough of Redbridge given the presence of Epping Forest SAC within the borough and the air quality sensitivity of that site.

Table 130: SI10 Aggregates

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	?
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	?
Long Term						n/a	n/a		n/a	+	++	n/a	n/a	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	?
Direct / Indirect						n/a	n/a		n/a	D	D	n/a	n/a	I	I	n/a	n/a	n/a	n/a	D	n/a	n/a	I	I
Temporary / Permanent						n/a	n/a		n/a	P	P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	P	n/a	n/a	P	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L	L	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	?
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	?
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	+	n/a	n/a	+	?
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	I		n/a	n/a	n/a	D	n/a	n/a	D	I
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	P	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL		n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	L
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		?
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		?
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		?
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				I	I		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				T/P	T/P		n/a	n/a		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L/ GL	L/ GL		n/a	n/a		L/ GL	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.8.11 SI11 Hydraulic fracturing

### Policy description

The policy ensures that any proposals for the exploration, appraisal and production of shale gas via hydraulic fracturing will be refused in London.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy identifies London as an inappropriate location for fracking. By prohibiting fracking, this policy promotes the protection of water resources from the adverse impacts of fracking, including surface and groundwater contamination. In addition, the policy protects green space and open space from inappropriate development and ensures these spaces remain accessible and enjoyable for Londoners to use.

The restriction on fracking would also protect existing air quality and noise generation by ensuring that the large volume of vehicles needed to transport water and materials required are avoided. This policy still remains supportive of climate change adaptation and mitigation, but prioritises commitments to energy efficiency and renewable energy generation over hydraulic fracturing.

#### Cumulative

This policy aligns with the policy SI3 Energy infrastructure which supports the provision of sustainable energy to Londoners and the refusal of hydraulic fracturing in London.

#### Recommendations

There were no specific recommendations associated with this policy.

### GLA response

No changes were made to the draft policy.

### Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present.

Table 131: SI8 Hydraulic fracturing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	O	O	O	O	+	n/a	+	n/a	n/a	n/a	O
Medium Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	O	O	O	O	+	n/a	+	n/a	n/a	n/a	O
Long Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	O	O	O	O	+	n/a	+	n/a	n/a	n/a	O
Direct / Indirect						n/a	n/a		n/a	n/a	n/a	n/a	n/a	I	I	I	I	D	n/a	D	n/a	n/a	n/a	I
Temporary / Permanent						n/a	n/a		n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	P	n/a	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	n/a	n/a	n/a	n/a	L	L	L	L	L/ GL	n/a	L/ GL	n/a	n/a	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	?	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	?	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	?	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	D	n/a	n/a	n/a	n/a	D	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	P	n/a	n/a	n/a	n/a	P	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a	L/ GL	n/a	n/a	n/a	n/a	L/ GL	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	+		O
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	+		O
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	+		O
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	D		n/a	n/a	D		I
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	P		n/a	n/a	P		P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	L/ GL		n/a	n/a	L/ GL		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.12 SI12 Flood risk management

### Policy description

This policy seeks to address the current and expected flood risk for all developments in a sustainable and cost-effective way. It encourages the production of flood risk assessments, development plans and surface-water management plans to manage and reduce the risks associated with flooding at a city-wide, borough-wide and development scale. This policy also supports the continuous maintenance and improvement of existing flood defence structures and their associated infrastructure.

It also supports collaborative working with the Environment Agency, Local Authorities and other relevant stakeholders to identify areas at risk of flooding and suitable mitigation strategies to protect communities within these areas.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The provision of housing which is resilient and allows residents to remain safe and comfortable during flood events will be an important aspect of managing future climate change. This assurance and protection would be particularly important for more vulnerable groups, such as low-income communities, elderly residents or those with mobility issues, who may have limited access to alternative accommodation options during extreme weather events.

Implementation of this policy would minimise the wide scale damage and associated interruptions and delays to economic activity that flooding events can cause. Ensuring existing flood defences and well maintained and enhanced, and restricting building in high-risk flood areas will help to ensure economic productivity can be sustained during flood events and future climate change. This would limit associated clean-up costs and business disruption after extreme events, and reduce London's vulnerability in the future.

Implementation of the policy would encourage a catchment-wide approach to planning whereby space is set-aside for water storage during high rainfall events. These spaces could take the form of valuable green/open space which would enhance the local landscape and encourage biodiversity. Spaces of this kind would offer local residents access to good quality green and blue spaces to exercise in and provide mental and physical respite from the city.

#### Cumulative

This policy complements policies G5 Urban greening, G4 Local green and open space, SI13 Sustainable drainage and D2 Delivering good design which support the use of open green spaces for flood alleviation and well designed and integrated SUDs.

#### Recommendations

It was recommended that further information is given on how additional space for water management and filtration will be incorporated into new developments, and how they will connect to existing waterways and be used by local residents. It was also recommended that further detail is provided on how flood risk could be mitigated in existing communities as well as on new developments. This could be particularly important for high risk flood areas which overlaps with deprived communities.

### GLA response

The policy was amended to provide additional guidance and clarity in its readability.

The GLA advised that other policies in the Plan SI13 addressed issues such as water management and filtration.

The GLA clarified that the policy dealt with identifying areas where particular flood risk occurs and that it is for boroughs through local plans to develop actions and policies aimed at reducing those risks.

### Appraisal of finalised policy

No further appraisal is required as changes made reflected clarification and improvements to readability, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive as it aims to reduce flood risk by working across authority boundaries and utilising strategic documents. There are no linking impact pathways present.

Table 132: SI12 Flood risk management

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	I	I	n/a	n/a	n/a	D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L	L	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	++	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D		n/a	I/D	D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.8.13 SI13 Sustainable drainage

#### Policy description

The policy ensures that development proposals follow the drainage hierarchy, achieve greenfield run-off rates and ensure water run-off is managed as close to its source as possible. In addition, any drainage proposal should address issues of water use efficiency, water quality, biodiversity, amenity and recreation and the potential for flooding.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Flooding events cause wide scale damage and interruption to London's economic activity. By ensuring London has an appropriate drainage strategy, this policy supports London's continued productivity and resilience, reducing direct clean-up costs and associated disruption to business from flood events. Designing developments, housing and utility services which remain functional during flooding events would also encourage a culture of equality whereby less mobile residents are not disproportionately impacted by high rainfall events.

The adoption of a wide variety of techniques to manage surface run-off, both as part of development proposals and the retrofitting existing buildings, will be important for building resilience. These could include the installation of blue and green roofs, porous surfaces and retention ponds. Effectively managing surface water run-off would minimise the risk of potential surface water contamination, soil degradation and erosion and improve overall water quality. By focussing on using sustainable features to manage water run-off, aspects of the natural environment will be protected and enhanced. New areas of green infrastructure could also be incorporated into developments which will encourage biodiversity and improve access for residents to functional public realm space. It would also contribute positively to the character and townscape of a local area.

##### Cumulative

This policy complements policies G5 Urban greening, SI12 Flood risk management and D2 Delivering good design which support flood alleviation schemes and well designed and integrated SUDs.

##### Recommendations

It was recommended that further information is provided on the ongoing maintenance of surface water management features. This would be particularly important for lower income households.

#### GLA response

Changes were made to the supporting text to include as reference to the ongoing maintenance of surface water management features.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present.

Table 133: SI13 Sustainable drainage

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	O/?		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	+/?	n/a	n/a
Medium Term						n/a	O/?		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	+/?	n/a	n/a
Long Term						n/a	O/?		n/a	++	+	n/a	n/a	n/a	+	n/a	n/a	++	++	+	n/a	+/?	n/a	n/a
Direct / Indirect						n/a	I		n/a	I/D	I/D	n/a	n/a	n/a	D	n/a	n/a	D	D	I	n/a	I	n/a	n/a
Temporary / Permanent						n/a	T/P		n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L		n/a	L/ GL	L	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	++	+	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D/I		n/a	D	D	I	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P		n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL		n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	D		I	n/a	I		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	T/P		T/P	n/a	T/P		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	L/ GL		L/ GL	n/a	L/ GL		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.14 SI14 Waterways- strategic role

### Policy description

The policy supports the coordination and alignment at the interfaces between terrestrial and marine planning. It also seeks to reflect the distinctiveness of different areas of the River Thames and encourage boroughs to work together to create development proposals and policies which support the Thames Strategies as well as individual water management plans.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Implementation of this policy would promote the use of the waterways for a range of community, cultural and recreational purposes. These types of activities can contribute significantly to the health and wellbeing of residents. Recreational and cultural activities, and good quality green and blue spaces can provide many physical and mental health and wellbeing benefits, including spaces for exercise and mindfulness, and increased social integration.

The policy highlights that the River Thames should not be designated as Metropolitan Open Land (MOL). This would ensure that it could continue to be utilised for transport activities. This could help to reduce volume of road vehicles by maximising river-based vehicles which can transport much larger volumes. This would therefore have associated improvements in local air quality, noise generation and carbon emissions by.

Implementation of this policy would help to address the current deficiencies in water-based passenger transport in the city. The promotion of water-based transport would help to reduce congestion on London roads and increase connectivity across the City particularly for communities who currently struggle to access employment opportunities and key services due to a lack of transport options. Water-based transport can also be a key tourist attraction and provide a way to access London's historical and cultural assets and strategic views.

#### Cumulative

Implementation of the policy could complement policies that support sustainable transportation and freight movement, particularly SI17 Protecting London's waterways and T7 Freight. The combination of policies could promote increased water quality across London's waterway by using sustainable water transport.

#### Recommendations

It was recommended further information was included on how new river transport links would tie into existing transport hubs and how they could be used to promote active transport. Particular reference could be made to the affordability of improved river transport options, this will assist lower income communities in using such services to access cultural opportunities. It was also recommended that more specific reference should be made to inclusive access.

The joint Thames Strategies could also consider existing water quality in different areas to reduce the risk of further pollution.

### GLA response

The GLA amended the supporting text include additional references to inclusive access, however advised that other policies in the Plan addressed this. The GLA also included a reference to water quality under joint Thames Strategies.

The GLA advised that connecting major hubs with the river transport to encourage use of the river and facilitate active transport was addressed in the Mayor's Transport Strategy.

In relation to the affordability of transport options, the GLA advised that the river service is complementary to other option on the public transport network, the cost of running is high and already requires significant subsidy.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy for London's European sites, in that encouraging use of London's waterways may reduce recreational visits to areas such as Epping Forest (such as through the Walthamstow Wetlands project due to open in 2017) and also may reduce vehicle movements on London's road network. Use of waterbodies such as reservoirs for (for example) recreation would still need to comply with the requirements of the Habitats Directive where those waterbodies are internationally important. This is a matter of law and does not need to be stated in this policy since the policy does not specifically identify particular waterbodies. The fact that recreational use and designated waterbodies are not incompatible is demonstrated by the Walthamstow Wetlands project which incorporates several internationally important waterbodies.

Table 134: SI14 Waterways- strategic role

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		+	+	n/a	n/a	?	O	O	O	n/a	?	?/+	+	?	n/a	n/a	n/a
Medium Term						n/a	+		+	+	n/a	n/a	?	O	O	O	n/a	?	?/+	+	?	n/a	n/a	n/a
Long Term						n/a	+		+	+	n/a	n/a	?	O	O	O	n/a	?	?/+	+	?	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	D	n/a	n/a	D	D	D	D	n/a	D	D	I	D	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		P	P	n/a	n/a	P	P	P	P	n/a	T/P	T/P	T/P	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	L	n/a	n/a	L/GL	L/GL /W	L/GL /W	L/GL /W	n/a	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	?	?	?	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a	?	?	?		n/a	?	?	?	?	n/a	n/a	?
Medium Term	O	?	+	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a	?	+	?		n/a	?	?	?	?	n/a	n/a	+
Long Term	+	?	+	n/a	n/a	n/a	+	n/a	+	+	n/a	n/a	?	+	+		n/a	?	?	?	?	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	n/a	I/D	n/a	D	D	n/a	n/a	D	D	I/D		n/a	I/D	I/D	I/D	I/D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	P	P	n/a	n/a	P	P	T/P		n/a	T/P	T/P	T/P	P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL	L/GL	n/a	n/a	n/a	L/GL	n/a	L/GL	L/GL	n/a	n/a	L/GL	L/GL /W	L/GL /W		n/a	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	O	O	O		n/a				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Medium Term	O	O	O		n/a				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Long Term	O	O	O		n/a				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Direct / Indirect	I	I	I		n/a				D	n/a				D	D		n/a	D		n/a	n/a	D		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				P	n/a				P	P		n/a	T/P		n/a	n/a	P		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				L/GL	n/a				L/GL /W	L/GL /W		n/a	L/GL		n/a	n/a	L/GL		n/a
<b>CSIA</b>																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.8.15 SI15 Water transport

### Policy description

The policy supports the protection, enhancement and future development of existing passenger transport piers, boatyards and wharves for commercial and tourist uses. It also supports the expansion freight transportation by river and safeguard the associated infrastructure required to ensure the freight handling capacity of the river is not reduced.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Improved transport links across London would encourage greater social interaction and access to employment opportunities, recreational activities, cultural events and historical assets. It could promote the use of more active transport between waterway transportation services, existing travel hubs and key economic and tourism areas, increasing healthier activities in day-to-day lives.

The promotion of water-based transport would help to reduce congestion on London roads, promote tourism and increase connectivity. This would help to drive London's economy, particularly its important tourism industry, by improving access to cultural and historic assets and to the important strategic views that sit along the River Thames.

The policy would encourage a modal shift in freight movement from road based transport to water based transport. A reduction in the number of road-based vehicles would result in improvements in local air quality and improve ambient noise conditions, facilitating further health and wellbeing benefits.

However, the use of the river for transport purposes could negatively impact water and soil quality and the surrounding natural environment by introducing pollution from increased transport activity and development on the waterways. The intensive use of waterways could compromise the quality of the water and have a detrimental impact upon the habitats of local importance and species within, and alongside the water.

#### Cumulative

This policy aligns with policies T7 Freight and servicing, E12 Visitor infrastructure and E6 Locally significant industrial sites which support the provision of commercial and tourist uses on water. The policy conflicts with policies G6 Biodiversity and access to nature and G5 Urban greening. The increased passenger transport on water is likely to affect the aquatic ecology and the wider environment.

#### Recommendations

It was recommended that further details is given on ensuring a balance between encouraging the development of the waterways and protecting against the potential impacts of development (noise, waste generation, pollution, environmental damage). It was also recommended that further information is provided on how more intensive use of the river and surrounding land could be appropriately managed to ensure that vulnerable communities are protected to potential impacts of flooding.

It was recommended that the policy could further reference supporting infrastructure required to improve the safety of active transport routes. This could include sufficient lighting, legibility measures, CCTV and cycle storage facilities. The policy could also further detail how such active transport modes can connect with the existing network, and support surrounding residential areas.

### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity for readability.

The GLA advised that potential mitigation measures, managing flood risk, design active travel and connectivity are covered elsewhere in the London Plan.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a potentially a positive policy in that the more use of waterways for passenger and freight movements, the fewer vehicle movements will occur on London's road network.

Table 135: SI15 Water transport

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		+	+	n/a	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Medium Term						n/a	n/a		++	+	n/a	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Long Term						n/a	n/a		++	+	n/a	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Direct / Indirect						n/a	n/a		D	D	n/a	n/a	D	I	I	I	n/a	I/D	n/a	D	D	D	n/a	I
Temporary / Permanent						n/a	n/a		P	T/P	n/a	n/a	P	P	P	P	n/a	T/P	n/a	T/P	P	T/P	n/a	P
Local / Greater London / Wider Region / Global						n/a	n/a		L/ GL	L	n/a	n/a	L/ GL	L/ GL /W	L/ GL /W	L/ GL /W	n/a	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL /W
<b>EQIA</b>																								
Short Term	?	?	+	O	n/a	n/a	n/a	O	+	+	+/?	n/a	+/?	+	O		n/a	-	n/a	-	+	n/a	n/a	+/?
Medium Term	+	+	+	O	n/a	n/a	n/a	O	+	+	+/?	n/a	+/?	+	O		n/a	-	n/a	-	+	n/a	n/a	+/?
Long Term	+	+	+	O	n/a	n/a	n/a	O	+	+	+/?	n/a	+/?	+	O		n/a	-	n/a	-	+	n/a	n/a	+/?
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	n/a	n/a	I/D	D	D	D	n/a	D	I	I		n/a	I/D	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	P	T/P	T/P	n/a	T/P	P	P		n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	n/a	n/a	n/a	L	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL /W	L/ GL /W		n/a	L/ GL	n/a	L/ GL	L/ GL	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				+	n/a				+	O		n/a	-		-	n/a	-		+
Medium Term	n/a	n/a	+		n/a				+	n/a				+	O		n/a	-		-	n/a	-		+
Long Term	n/a	n/a	+		n/a				+	n/a				+	O		n/a	-		-	n/a	-		+
Direct / Indirect	n/a	n/a	I		n/a				D	n/a				I	D		n/a	D		I/D	n/a	D		I
Temporary / Permanent	n/a	n/a	T/P		n/a				P	n/a				P	T/P		n/a	T/P		T/P	n/a	T/P		P
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				L/ GL	n/a				L/ GL /W	L/ GL /W		n/a	L/ GL		L/ GL	n/a	L/ GL		L/ GL /W
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I															
Temporary / Permanent				n/a					P															
Local / Greater London / Wider Region / Global				n/a					L															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.16 SI16 Water use and enjoyment

### Policy description

This policy supports the utilisation and enjoyment of the waterways by providing water-sport centres, water infrastructure, new moorings and associated facilities as well as promoting the use of the waterways for cultural, educational and community facilities. It will also seek to protect existing access points to the waterways, as well as promoting improvements to, and the expansion of, the Thames Path and towpaths.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy would promote the use of the waterways for a range of community, cultural, educational and recreational opportunities which could contribute to social inclusion and participation in opportunities London offers. Utilisation of the waterways for a range of recreational opportunities including rowing, sailing and canoeing, alongside the use of the Thames Path, would facilitate an increase in more active, healthier lives.

The promotion of water-based transport would help to reduce congestion on London roads, promote tourism and increase connectivity. This would help to drive London's economy, particularly its important tourism industry, by improving access to cultural and historic assets and to the important strategic views that sit along the River Thames.

The intensive use of waterways could compromise the quality of the water and the surrounding natural environment by introducing pollution from increased transport activity, development on the waterways and litter from increased use and have a detrimental impact upon the habitats of local importance and species within and alongside the water. Depending on the type of use, this policy could impact ambient noise conditions and increase disturbance to local residents.

#### Cumulative

This policy could conflict with policies G4 Local green and open space and D7 Public realm which seek to preserve the environmental quality of London's water bodies and associated habitats. However, the implementation of the policy would complement the policy S5 Sports and recreation which promotes more active lives and enjoyment of London's spaces.

#### Recommendations

It was recommended that where the provision of new sports infrastructure is concerned, the policy could provide further detail on how this provision will be spatially allocated, for example will areas of deprivation or existing deficit be prioritised. It was also recommended that further reference could be made to supporting infrastructure, such as lighting, electricity supply and broadband to underpin economic vitality along canal and waterways.

Further reference could also be made to the affordability of moorings, and how these will be allocated across relevant communities/ applicants.

Further reference could also be made to how conflicts in land and water use can be managed, to allow economic and cultural vitality without causing adverse impacts to local residents and services. This could include noise restrictions on certain night-time activities, appropriate design and spatial management of uses, and consultation with groups at risk.

It was also recommended that examples are given on the types of educational, cultural and sporting events which the river could be used for and any barriers to accessing these events which could occur for local residents.

### GLA response

The GLA advised that the appropriateness and location of infrastructure to support sports facilities on the river would be determined locally by boroughs. In relation to other supporting infrastructure, the GLA advised that this applies to all transport connections and these issues are addressed in other policies elsewhere in the Plan.

In terms of the affordability of mooring, the GLA advised that that by increasing the supply of mooring would facilitate with affordability issues however, the more specific detail would be addressed through the emerging Canal & River Trust's Mooring Strategy.

The GLA clarified that other policies in the London Plan allow the balancing act of promoting economic and cultural vitality without causing adverse impacts to local residents and services; specifically SI17 assist with this. The GLA also advised that the appropriateness of educational, cultural and sporting events would depend on local circumstances.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy for London's European sites, in that encouraging use of London's waterways may reduce recreational visits to areas such as Epping Forest (such as through the Walthamstow Wetlands project due to open in 2017) and also may reduce vehicle movements on London's road network.

Table 136: SI16 Waterways- use and enjoyment

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Medium Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Long Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Direct / Indirect						n/a	n/a		D	D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	D	I/D	D	n/a	n/a	D
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		L/GL	L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	L	n/a	n/a	L/GL
<b>EQIA</b>																								
Short Term	+	+	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Medium Term	+	+	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Long Term	+	+	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Direct / Indirect	I	I	I	n/a	n/a	n/a	n/a	n/a	I/D	I/D	n/a	D	n/a	n/a	n/a		n/a	I/D	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a		n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	n/a	L	n/a	n/a	n/a		n/a	L/GL	n/a	L/GL	L	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				n/a	n/a							n/a	?/-		+	+	?/-		?/-
Medium Term	+	+	+		n/a				n/a	n/a							n/a	?/-		+	+	?/-		?/-
Long Term	+	+	++		n/a				n/a	n/a							n/a	?/-		+	+	?/-		?/-
Direct / Indirect	I	I	I		n/a				n/a	n/a							n/a	D		I	D	D		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a							n/a	T/P		T/P	T/P	T/P		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a							n/a	L/GL		L	L	L/GL		L/GL
<b>CSIA</b>																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/GL															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.8.17 SI17 Protecting London's waterways

### Policy description

The policy seeks to ensure that all future developments facilitate river restoration and protection and maintain the open character and heritage of the waterways. It also supports the preservation of the local character and environment of London's canal network, docks, rivers and other water spaces whilst ensuring they remain accessible and usable to residents and visitors.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The River Thames is an iconic part of London and this policy ensures any new development respects the local environment and allows the waterway to remain dynamic and modern. The positive regeneration of waterway areas, and the provision of public realm, residential, office, bars and restaurant uses, will continue to drive London's economy, ensuring it remains an attractive place for tourists and businesses alike. This policy also ensures waterways are accessible to users and promotes water-related uses. This would improve access to active and fulfilling activities, such as water-based sports, which can provide both mental and physical health benefits.

The support for river restoration and naturalisation to encourage the development of natural local habitats would ensure the biodiversity of waterways are protected and enhanced. Protection from the pollution caused by moored vessels, and the potential impacts of increased development on land (e.g. increased litter) would be managed appropriately to ensure the biodiversity of the river is protected alongside continued development and recreational use. The policy does not prohibit the use of the river for transport and recreation, but ensures appropriate measures are in place to protect it. In addition, the policy promotes the adoption of on-shore power at water transport facilities, which would contribute to reduced emissions and improvements in air quality for local residents.

#### Cumulative

The implementation of the policy would complement those policies that support the development of London's waterways namely, SI15 Water transport and SI16 Waterways – use and enjoyment. These policies promote the use and development of the river and should be in place in conjunction with this policy. In addition, this policy supports the restoration of naturalisation which supports and aligns with the policy G6 Biodiversity and access to nature.

#### Recommendations

It was recommended that reference is made in the policy to the affordability of local energy generation, particularly for those communities living on the waterways in houseboats who have limited access to alternative energy options.

It was recommended that further details are given on ensuring a balance between encouraging the development of the waterways and protecting against the potential impacts of development (noise, waste generation, pollution, environmental damage). It was also recommended that further reference on how air quality be monitored and mitigated could be incorporated as part of this policy. This would further help to protect more vulnerable groups from adverse air quality impacts.

### GLA response

The policy was amended to improve readability. The GLA advised that it is more appropriate for borough local plans to address issues of local energy generation. The GLA also advised that the Plan

needs to be read as a whole and that different interests need to be balanced according to local circumstances. Other issues such as air quality, noise and waste were dealt with elsewhere in the Plan.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no impact pathways present.

Table 137: SI17 Protecting London’s waterways

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	n/a	+/?	+	n/a	n/a	n/a	n/a
Medium Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	n/a	+/?	+	n/a	n/a	n/a	n/a
Long Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	n/a	+/?	+	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	I	n/a	n/a	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L	n/a	n/a	n/a	L	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	?	n/a	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	?	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	?	n/a	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	?	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	?	n/a	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	I	n/a	I	I	n/a	n/a	I/D	n/a	n/a	n/a	D	I/D		D	D	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	T/P	T/P		T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	L	n/a	L	L	n/a	n/a	L/ GL	n/a	n/a	n/a	L	L		L	L	n/a	L	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London’s geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9 Transport

### 9.9.1 T1 Strategic approach to transport

#### Policy description

This policy provides an overall goal to reduce Londoners' dependency on cars with a shift toward more sustainable forms of transport, and support the target of 80% of all London trips to be made on foot, bicycle or via public transport by 2041. This is achieved through encouraging efficient use of well-connected and accessible land, as well as increasing the capacity and quality of public and active transport infrastructure.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

This policy seeks to reduce Londoner's dependency on car use and provide more accessible and attractive transport routes. Increased use of active transport and a reduction in private car use would have a beneficial effect on health and well-being through increased levels of exercise, reduced air pollution and carbon emissions, and less vehicle related noise disturbance. More attractive transport options, in particular active transport options, such as cycling and walking, may involve improved landscaping which could indirectly benefit townscape and cityscape character, and alleviate the urban heat island effect.

The provision of public and active transport infrastructure as set out in this policy, would encourage more efficient mobility throughout London, especially for sites that are already well-connected. This would indirectly promote the sustainable use of brownfield land and ensure the delivery of vital physical infrastructure. Providing more efficient and low-cost travel options would reduce severance and make public and active transport financially accessible for more deprived parts of London. This would generate further economic benefits by increasing access to opportunities across London, particularly employment and education.

A decrease in private vehicles on London roads would indirectly improve road safety throughout London, and could make London more resilient to major incidents. It would also reduce road congestion but could temporarily increase pavement congestion and crowding on public transport if capacity is slow to improve. Once capacity has increased to accommodate future demand, this would have the long-term benefit of increasing available land that is well-connected for development such as housing.

The reduction in private vehicle use and delivery of more efficient freight transport would ensure wider air quality improvements by reducing the number of vehicles on the road generating emissions.

##### Cumulative

This policy complements policies SI4 Managing heat risk, SI12 Flood risk management, D6 Optimising housing density, H10 Redeveloping existing housing and review mechanisms, T2 Healthy streets and G4 Local green and open space which support the associated brownfield use and increasing connectivity. More attractive transport routes, for example parks and tree lined streets, green infrastructure, as well as contribute to London's resilience to climate change impacts such as flooding and the urban heat island.

#### Recommendations

This policy is high level and encourages overall uptake of public and active transport. However it does not explicitly mention inclusive access to ensure all Londoners can participate. Additionally, the policy could be more specific, such as directly addressing cyclist or pedestrian safety and security.

The policy could go further to mention the integration of different transport networks so that interchange between modes is efficient.

#### GLA response

Minor editorial changes to the text were made. The GLA advised that other policies in the Plan address issues such as inclusive access is dealt with within other policies within the Plan. The GLA further advised that the management of the transport service and setting explicit mode share targets is not appropriate for the London Plan as this is dealt with in the Mayor's Transport Strategy.

#### Appraisal of finalised policy

The policy text was amended to improve clarity, however the assessment ultimately remains the same.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse impact pathways present.

Table 138: T1 Strategic approach to transport

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						O	+		+	+	+	+	+	+	+	O	+	O	n/a	n/a	n/a	n/a	+	+	+
Medium Term						+	+		+	+	+	+	+	+	O	+	+	n/a	n/a	n/a	n/a	+	+	+	
Long Term						+	++		++	+	+	+	+	+	++	+	++	+	n/a	n/a	n/a	n/a	+	+	+
Direct / Indirect						I	I/D		D	I	I	I	I	I/D	I	I/D	I/D	n/a	n/a	n/a	n/a	I/D	I/D	I/D	
Temporary / Permanent						T/P	T/P		P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	
Local / Greater London / Wider Region / Global						L/GL /W	L/GL /W		L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	n/a	n/a	L/GL /W	L/GL /W	L/GL /W	
<b>EQIA</b>																									
Short Term	+	+	n/a	+	n/a	O	+/?	+	O	+	O	+	n/a	O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	
Medium Term	+	+	n/a	+	n/a	+	+/?	+	+	+	+	+	n/a	+	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	
Long Term	+	+	n/a	+	n/a	+	+/?	++	+	+	+	+	n/a	+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	
Direct / Indirect	I	I/D	n/a	I	n/a	I	I	I/D	I	I	I	I	n/a	I	I		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	
Temporary / Permanent	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	L/GL /W	L/GL	L/GL /W	n/a	L/GL	L/GL /W		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	
<b>HIA</b>																									
Short Term	+	+	+		n/a				+	n/a				+	O		n/a	n/a		?	n/a	n/a		O	
Medium Term	+	+	+		n/a				+	n/a				+	O		n/a	n/a		?	n/a	n/a		O	
Long Term	+	+	+		n/a				+	n/a				++	+		n/a	n/a		?	n/a	n/a		+	
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I		n/a	n/a		I	n/a	n/a		D	
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	T/P		n/a	n/a		T/P	n/a	n/a		T/P	
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				L/GL /W	n/a				L/GL /W	L/GL /W		n/a	n/a		L	n/a	n/a		L/GL	
<b>CSIA</b>																									
Short Term				?					?																
Medium Term				?					?																
Long Term				?					?																
Direct / Indirect				I/D					I/D																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L/GL					L/GL																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.9.2 T2 Healthy streets

### Policy description

The policy supports the provision of high-quality, pleasant and attractive environments to encourage Londoners to walk, cycle and use public transport more. It also aims to better manage the movement of freight across the city so there is more street space available during the day for walking and cycling, which will benefit Londoners experience of the city's streets.

### Initial appraisal and recommendations

#### Social economic and environmental effects

The implementation of the Healthy Street Approach would support mixed-use sustainable neighbourhoods. High quality walking infrastructure is likely to have a positive effect on the wellbeing of Londoners; as accessible and attractive transport routes could encourage greater participation in active transport. The policy has a number of physical health benefits and would favour active lifestyles and high quality environmental conditions. This is likely to support improved mental and physical wellbeing, and contribute to a reduction in health inequalities across the city.

The Healthy Street Approach would include a range of kerbside features to enhance the attractiveness of the local area, contributing towards positive feelings and perceptions of the local environment. However, this policy does not consider the historic environment, existing sense of place or townscape character and should therefore seek to enhance them in a positive and respectful manner.

This policy promotes the regeneration of local areas and will increase connectivity of active transport routes. Increased connectivity would limit reliability on car trips, thereby reducing associated poor air quality and excess noise, whilst promoting affordable transport options that reduce socio-economic inequalities. Improved environmental conditions and air quality is particularly important for higher risk groups such as residents with existing respiratory conditions, young children, older people and pregnant women.

This increase in sustainable transport modes could also benefit London's resilience to extreme climatic events and climate change impacts. The implementation of the policy would also increase access to wider environmental infrastructure which could also provide positive economic benefits by supporting large scale housing growth and access to opportunities such as employment and education.

The policy does not consider user safety or seasonal challenges of the Healthy Street Approach. This may limit the optimum capacity and demand of this high-quality walking infrastructure during unsociable hours and winter season respectively.

#### Cumulative

This policy closely aligns with other policies G4 Local green and open space and T5 Cycle parking which support health, the protection and enhancement of the environment and active forms of transport that could improve the sustained wellbeing of Londoners.

#### Recommendations

It was recommended that further reference was made in relation to inclusive access and design and supporting infrastructure to improve safety at night. Further design and access features should be considered to provide accessibility for all residents including flat kerbs for wheelchair and buggy users and improved legibility to accommodate residents with sensory impairments or language barriers.

This policy could include reference to any specific air quality standards to be achieved and to ensure this policy is a benefit to London's resilience, a reference could be added to highlight the importance of an 'adaptable' transport system that can respond to changes in the environment. The role of the Healthy Street Approach in transitioning London to a low carbon economy should be considered.

### GLA response

Although no changes were proposed to be made to the draft policy, amendments were made to the supporting text to provide additional guidance. The GLA clarified that the Plan should be read as a whole and therefore other policies within the Plan addressed recommendations such as air quality, heritage led growth, inclusive design, the public realm, design, and the night-time economy

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy promotes the reduction in car use, and vehicle emission, and increase walking, cycling and public transport which could result in a positive impact upon European designated sites that are sensitive to poor air quality.

Table 139: T2 Healthy streets

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	+		+	n/a	O	n/a	n/a	O/+	O/+	+	O/+	n/a	n/a	?	n/a	n/a	?	O/+
Medium Term						+	+		+	n/a	+	n/a	n/a	+	O/+	+	+	n/a	n/a	+	n/a	n/a	?	+
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	n/a	n/a	+	n/a	n/a	?	+
Direct / Indirect						I	D		D	n/a	I	n/a	n/a	D	I/D	D	I	n/a	n/a	D	n/a	n/a	I	I
Temporary / Permanent						T/P	T/P		P	n/a	P	n/a	n/a	P	P	P	T/P	n/a	n/a	P	n/a	n/a	P	P
Local / Greater London / Wider Region / Global						L/GL /W	L		L/GL	n/a	L/GL	n/a	n/a	L/GL /W	L/GL	L/GL /W	L/GL	n/a	n/a	L/GL	n/a	n/a	L/GL	L/GL
<b>EQIA</b>																								
Short Term	+	+	+	O	n/a	+	+	O	+	n/a	O	n/a	n/a	O/+	n/a		O	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	++	O	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		+	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	+	+	++	O	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		+	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	I	n/a	I	I	D	D	n/a	I	n/a	n/a	I	n/a		I	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	P	n/a	P	n/a	n/a	P	n/a		T/P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L/GL	L	L	L/GL	n/a	L/GL	n/a	n/a	L/GL /W	n/a		L/GL /W	n/a	n/a	L/GL	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				+	?				O/+	O/+		n/a	n/a		?	n/a	n/a		+
Medium Term	+	+	++		n/a				+	?				+	O/+		n/a	n/a		+	n/a	n/a		+
Long Term	+	+	++		n/a				+	?				+	+		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				D	I				D	I/D		n/a	n/a		I	n/a	n/a		I
Temporary / Permanent	T/P	T/P	T/P		n/a				P	T/P				P	P		n/a	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				L/GL /W	L				L/GL /W	L/GL		n/a	n/a		L/GL	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				?					O															
Medium Term				?					+															
Long Term				?					+															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.9.3 T3 Transport capacity, connectivity and safeguarding

#### Policy description

This policy addresses capacity and connectivity concerns both currently and in the future. Developments should support the sustainable development of London, national and international public transport connections. This is enabled by the provision and safeguarding of sufficient land to allow for expanded public and active transport systems. Particular emphasis is put on delivering Underground line upgrades, securing Crossrail 2 and the Bakerloo Line Extension, and supporting increased capacity and efficiency on the bus network.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Implementation of this policy would indirectly benefit public transport accessibility by providing affordable and sustainable travel options. This would help mitigate severance and isolation through improved access to opportunities and services. This could have a number of regenerative impacts on deprived areas, including improving access to employment opportunities to reduce socio-economic inequalities. The safeguarding of future public transport assets can also indirectly facilitate the delivery of a safer and more secure transport network, whilst promoting efficient and sustainable public transport.

The policy encourages the efficient use of land that is already well-connected. Improvements to the current public transport network supports the use of these sites for development, which could allow for increased housing delivery and indirectly benefit access to services and facilities. This is further supported by the emphasis on Crossrail 2 and the Bakerloo Line Extension which aim to connect more areas to central London. Improvements to the connectivity of transport infrastructure is a crucial factor in catering for London's growth and maintaining its economic competitiveness.

Increased capacity and reliability on sustainable transport networks would also alleviate crowding on public and active transport routes. This would help to improve London's productivity by decreasing journey times, improving Londoners' quality of life, and allowing more people to have greater access to opportunities and services across the city and wider region. Increasing the use of sustainable transport would also lead to fewer journeys taken by private vehicle, reducing air and noise pollution and associated carbon emissions.

The safeguarding of the Walk London Network would promote active transport which offers a number of health and wellbeing benefits due to increased levels of exercise and access to higher quality walking paths. Increased capacity and connectivity of active transport networks could also involve landscaping which would benefit London's natural capital and townscape, and help to alleviate issues such as the urban heat island effect.

##### Cumulative

This policy supports policies S11 Improving air quality, T2 Healthy streets, D13 Noise and SD10 Strategic and local regeneration which aim to reduce private vehicle use and increase the use of active and public transport, which benefits London's air quality, decrease noise disturbances and promote healthy lifestyles. The policy also supports the economic regeneration of areas by providing accessible and affordable connectivity across London.

#### Recommendations

It was recommended that the policy was more specific in its promotion of active transport and inclusive design to benefit the health and wellbeing of Londoners and increase equality in terms of access and provision of infrastructure throughout London. Additionally, it could directly refer to safety and security on public transport as well as the resilience of the public transport network to major incidents.

#### GLA response

The GLA advised that other policies in the Plan addressed the recommendations such as active travel in T2 Healthy Streets, D7 Public Realm and T4 Assessing and mitigating transport impacts. The GLA further advised that safety and security on public transport and the resilience of the public transport network to major incidents was addressed in the Mayor's Transport Strategy.

#### Appraisal of finalised policy

Some detail was removed along with minor editorial amendments, however the direction of the policy remains the same. The detail removed relates to specific transport attributes to be targeted, as well as reference to intensification and the environmental performance of the public transport system.

Removal of the specific mention of environmental performance of the transport system has changed some of the previously positive effects to no change. However, the addition of the safeguarding the Walk London Network and the emphasis on the bus network has benefits for both health and the environment.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Improving public transport capacity and connectivity will be positive for protecting European sites sensitive to air quality, notably Epping Forest SAC. None of the specific schemes identified by the Mayor as a particular priority would have a likely significant effect on any European sites.

Table 140: T3 Transport capacity, connectivity and safeguarding

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	?		+	+	+	n/a	n/a	O	O	O	O	n/a	n/a	?	n/a	n/a	n/a	O
Medium Term						+	?		+	+	+	n/a	n/a	O	O	+	O	n/a	n/a	?	n/a	n/a	n/a	+
Long Term						+	?		+	+	+	n/a	n/a	+	+	+	+	n/a	n/a	?	n/a	n/a	n/a	+
Direct / Indirect						I	I/D		I/D	I/D	I	n/a	n/a	I	I	I	I/D	n/a	n/a	I/D	n/a	n/a	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	P	T/P	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	L/GL		L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	L/GL /W	L/GL	L/GL	n/a	n/a	L/GL /W	n/a	n/a	n/a	L/GL
<b>EQIA</b>																								
Short Term	O	O	O	O	n/a	O	n/a	+	+	+	+	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Medium Term	O	O	+	+	n/a	+	n/a	+	+	+	+	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Long Term	O	O	+	+	n/a	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Direct / Indirect	I	I	I	I	n/a	I	n/a	I	I	I	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL	L/GL	n/a	L/GL /W	n/a	L/GL	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a		n/a	n/a	n/a	n/a	L/GL	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				O	n/a				O	O		n/a	n/a		?	n/a	n/a		O/-
Medium Term	+	+	+		n/a				+	n/a				O	O		n/a	n/a		?	n/a	n/a		O/-
Long Term	+	+	+		n/a				++	n/a				+	+		n/a	n/a		?	n/a	n/a		O/-
Direct / Indirect	I	I	I		n/a				D	n/a				I	I		n/a	n/a		I/D	n/a	n/a		I
Temporary / Permanent	T/P	T/P	T/P		n/a				P	n/a				T/P	T/P		n/a	n/a		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL		n/a				L/GL /W	n/a				L/GL /W	L/GL /W		n/a	n/a		L/GL /W	n/a	n/a		L/GL
<b>CSIA</b>																								
Short Term				n/a					O															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.4 T4 Assessing and mitigating transport impacts

### Policy description

The aim of this policy is to ensure transport impacts of development plans and proposals are fully assessed against policy and current and planned transport access, capacity and connectivity. Additionally, it sets out the need for mitigation to be provided, with specific mention of air quality, and opportunities to embed the Healthy Streets Approach within and near to the new development.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

Assessing and mitigating transport impacts for new developments would have positive effects on sustainable land use, as it promotes the use of existing transport networks, both close to the development, across greater London and the wider region. This policy promotes new developments that are located in well-connected places with capacity adequate to support additional demand, or where there is a realistic prospect of additional access or capacity being provided in time to meet the new demand.

Comprehensive transport assessments promoted by this policy would also improve connectivity via public transport in outer London and which may also help to manage local road congestion. However, the policy does not cover access to public transport hubs via active transport. This policy ensures any adverse transport impacts are mitigated, for example in the form of accessible transport infrastructure connected to new housing developments or financial contributions to improve network service levels. This could positively impact on economic competitiveness and further housing delivery. This requirement for the provision of mitigation could also encourage increased energy efficiency and reduce local noise and vibration disturbances.

This policy references cumulative effects on London's air quality to discourage the use of more polluting methods of transport. This would have a long-term positive effect on London's air quality. An overall improvement in local air quality would be beneficial for the health of those in London and in particular more deprived areas which are often disproportionately affected by poorer air quality.

#### Cumulative

This policy aligns with policy SI1 Improving air quality which supports the reduction and mitigation of increasing airborne pollutants and their effects to human health. The policy also aligns with D13 Noise which also supports the reduction of noise pollution in London, of which transport is one of a significant source.

#### Recommendations

It was recommended that this policy reference the equitable provision of infrastructure in high density growth locations to ensure both current and future residents have equal opportunities to access services. Furthermore, reference could be made to the active transport network, for example to allow future residents to access the public transport network, in terms of sustainable and green transport.

It was also recommended that further detail was added to mitigation measures, such as form and extent of the measures required, to make the policy more robust. This could indirectly improve noise and vibration disturbance, and may discourage habitat fragmentation.

### GLA response

Further detail was added to ensure transport assessments are robust and take into account Healthy Streets. Additional reference to examples of mitigation measures were included, and minor changes were made to clarify the circumstance under which a development may be refused. The GLA also clarified that policy T3 better addressed issues of the equitable provision of infrastructure in high density growth locations.

### Appraisal of finalised policy

The clarifications in the finalised policy ascertain the positive effects this policy would have on issues such as air quality.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. 'The cumulative impacts of development on the transport network, including road network capacity and associated effects on London's air quality, must be taken into account and mitigated' which has the potential to reduce atmospheric pollution generally, and thus potentially have a positive impact on European designated sites that are sensitive to poor air quality.

Table 141: T4 Assessing and mitigating transport impacts

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	n/a		+	O	+	n/a	n/a	+	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	?
Medium Term						+	n/a		+	+	+	n/a	n/a	+	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	?
Long Term						+	n/a		++	+	+	n/a	n/a	+	n/a	?	n/a	n/a	n/a	?	n/a	n/a	n/a	?
Direct / Indirect						I	n/a		D	I	I	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	n/a		T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	n/a		L/GL /W	GL	L	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	n/a	n/a	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a	+	n/a	+	n/a	n/a	+	n/a		?	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a	+	n/a		?	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a	+	n/a		+	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	D	n/a	I/D	n/a	n/a	I	n/a		I	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	n/a		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	L/GL /W	n/a	n/a	L/GL /W	n/a	L/GL	n/a	n/a	L/GL	n/a		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		?	n/a	n/a		?
Medium Term	n/a	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		?	n/a	n/a		?
Long Term	n/a	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		?	n/a	n/a		?
Direct / Indirect	n/a	n/a	I		n/a				I	n/a				I	n/a		n/a	n/a		I/D	n/a	n/a		I
Temporary / Permanent	n/a	n/a	T/P		n/a				T/P	n/a				T/P	n/a		n/a	n/a		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL /W		n/a				L	n/a				L/GL	n/a		n/a	n/a		L	n/a	n/a		L
<b>CSIA</b>																								
Short Term				+/+					n/a															
Medium Term				+/+					n/a															
Long Term				+/+					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL /W					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.5 T5 Cycle parking

### Policy description

This policy aims to facilitate an increase in cycling activity and remove barriers to cycling through the delivery of cycle routes and provision of cycle parking. The policy sets out the minimum cycle parking standards for development projects, categorised by land use.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

This policy promotes the role of development plans and development proposals in facilitating an increase in cycling and removing barriers to cycling. It encourages the consideration of appropriate alternative locations for cycle parking in instances where adequate and suitable provision may not be possible within residential developments, and (on-street) off the public highway for visitors.

The implementation of this policy would encourage more active lifestyles, and go some way towards reducing health inequalities across the city. This would provide mental and physical health and wellbeing benefits due to the close associations between exercise and good health. By ensuring the delivery of cycle routes and improvements in infrastructure, implementation of the policy would also promote inclusion and integration in communities, and also enhance the character of the city. It could improve wider accessibility and connectivity by increasing access to the opportunities, services and facilities London provides through sustainable, affordable transport.

The creation of cycle routes and cycle parking would need to be supported by a number of security features, such as lighting, high quality legibility and surveillance, where appropriate. This could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

Through the promotion of cycling and a move away from motorised, private transport, implementation of the policy would support the reduction of emissions and concentrations of harmful atmospheric pollutants. This would support improvements to air quality and climate change affects, and would also contribute to minimising ambient noise and vibration from traffic.

#### Cumulative

This policy complements policies T2 Healthy streets, T1 Strategic approach to transport, SI1 Improving air quality and G4 Local green and open space which support the delivery of increased active travel and transport infrastructure to improve air quality and increase health and wellbeing to transport users, such as commuters.

#### Recommendations

This policy does not reference the safety of the cycle parking in any detail, which could stop some people from walking/cycling if they feel facilities are not secure or they feel at risk using them. In addition, the policy could further reference inclusive access, and quality in relation to active transport opportunities.

### GLA Response

The policy was amended to include a reference to safety and inclusivity in relation to cycling parking. The GLA advised that this policy alongside policy T1 and T2 supported active travel opportunities.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as an increase in cycle parking provision may encourage the use of active travel.

Table 142: T5 Cycle parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						O	O		O	n/a	+	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I	I/D		I/D	n/a	I/D	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	L/GL	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>EQIA</b>																								
Short Term	O	O	O	?	n/a	O	O	+	?	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term	+	+	+	O	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	+	+	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	I/D	
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	L/GL	
<b>CSIA</b>																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/GL															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.9.6 T6 Car parking

### Policy description

This policy facilitates the restriction of car parking through the promotion of car-free development proposals, especially in areas well connected by public transport. It also supports application of the maximum parking standards and provision of disabled persons parking and electric vehicle charging infrastructure set out in Policies T6.1- T6.5.

The policy requires the submission of a Car Park Design and Management Plan alongside all applications which include car parking provision.

### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This initial draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

### Appraisal of finalised policy

#### Social, economic and environmental effects

The implantation of this policy would ensure the restriction of car parking, encouraging the use of more sustainable transport patterns such as walking and cycling. This could lead to more active lifestyles, and go some way towards reducing health inequalities across the city. The protection and delivery of disabled persons parking (Blue Badge Holders) would ensure London remains inclusive and integrated.

The policy supports car-free development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided, this could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

Although the policy restricts car parking, it would improve accessibility, connectivity and sustainability in London as it reduces the demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages more active and sustainable transport methods.

Through the promotion of car-free development and sustainable modes of transport, including electric vehicles, implementation of the policy would have positive effects on objectives that aim to reduce emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and contribute positively to climate change adaptation. This policy would also help to minimise noise and vibration levels and disruption as car-free developments and a reduction in cars would contribute to a decrease in noise levels.

#### Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

#### GLA response

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a reduction in parking provision may discourage the use of private cars.

Table 143: T6 Car parking

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						?/+	O		O	n/a	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						?/+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						?/+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>EQIA</b>																									
Short Term	O	O	O	O	n/a	O	O	O	O	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term	+	+	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	+	+	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																									
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O	
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O	
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	+	
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	I/D	
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	n/a	L/GL	
<b>CSIA</b>																									
Short Term				O					?																
Medium Term				+					?																
Long Term				+					?																
Direct / Indirect				I/D					I/D																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L					L/GL																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.7 T6.1 Residential parking

This policy facilitates the restriction of residential car parking through the promotion of car-free development proposals in inner London and large scale shared living residential areas such as student accommodation. It provides maximum residential car parking standards that should be applied to all new residential development based on their location within London.

This policy supports the provision of infrastructure for electric or Ultra Low Emission vehicles, disabled persons parking and consideration of parking spaces for infrequent trips e.g. car club spaces.

### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

### Appraisal of finalised policy

#### Social, economic and environmental effects

This policy promotes the restriction of residential car parking in inner London and large developments, which could encourage the use of more sustainable transport patterns such as walking and cycling in these areas. This could promote active lifestyles, and go some way towards reducing health inequalities across the city, also providing mental and physical benefits. The protection and delivery of disabled persons parking (Blue Badge Holders) would ensure London remains inclusive and integrated. Local regeneration alongside these car-free developments would also positively contribute to enhancements in the character and townscape of the city.

This policy partly supports car-free development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided this could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

This policy would improve accessibility, connectivity and sustainability as it promotes the partial restriction and management of residential car parking in order to reduce demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages healthier, active forms of transport over the use of private vehicles.

Through the promotion of car-free residential development and sustainable modes of transport, including electric vehicles and Ultra Low Emission vehicles, implementation of the policy would contribute to reduction in emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand.

This policy would help to minimise noise and vibration levels and disruption as car-free developments and use of electric vehicles would contribute to a reduction in noise levels. However, by limiting residential car parking, the policy may negatively affect the sale of new homes if individual's desire parking alongside their homes, however as this policy only applies to new build properties, there would still be a choice of homes in the existing housing stock.

#### Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use. This policy could conflict with policy H16 Accessible housing which supports housing which connects with existing infrastructure and amenities. The restriction of residential car parking may reduce connectivity and reduce accessibility.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use

### GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of residential car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Table 144: T6.1 Residential parking

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	O		O	n/a	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	n/a	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>EQIA</b>																									
Short Term	O	O	O	?	-/?	O	O	O	?	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	-/?	+	+	+	+	n/a	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+	+	-/?	+	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	I	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	L/GL/W	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																									
Short Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O	
Medium Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O	
Long Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	+	
Direct / Indirect	D	D	D		I				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	I/D	
Temporary / Permanent	P	P	P		T/P				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	L	L	L		L/GL/W				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	n/a	L/GL	
<b>CSIA</b>																									
Short Term				O					?																
Medium Term				+					?																
Long Term				+					?																
Direct / Indirect				I/D					I/D																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L					L/GL																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.8 T6.2 Office parking

### Policy description

This policy facilitates the restriction of office car parking through the promotion of car-free development proposals in inner London and outer London areas which are well connected e.g. close to stations. It provides maximum office car parking standards that should be applied to all new office development based on their location within London. Where more generous standards are proposed to be adopted, London boroughs are required to provide evidence in their Development Plans (applies to outer London boroughs only).

This policy supports the provision of infrastructure for electric and Ultra Low Emission vehicles and requires the submission of a Car Park Design and Management Plan alongside all applications which include car parking provision.

### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

### Appraisal of finalised policy

#### Social, economic and environmental effects

This policy promotes the restriction of office car parking in inner London and well-connected parts of outer London. This would encourage the use of more sustainable transport patterns such as walking and cycling in these areas and therefore go some way towards reducing health inequalities across the city, also providing mental and physical benefits. The combination of car-free office developments and local regeneration would therefore also positively contribute to enhancements in the character and townscape of the city.

This policy supports car-free office development in well-connected, inner-London areas, encouraging a modal shift to more sustainable transport forms, including active transport routes and public transport. Private vehicles can offer a greater sense of security, particularly for less mobile individuals. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided this

could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

Through the promotion of car-free office development in well-connected, built-up areas and the use of sustainable modes of transport, including electric vehicles and Ultra Low Emission vehicles, implementation of the policy would contribute to reducing emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand. This policy would help to minimise noise and vibration levels and disruption as car-free developments and the use of electronic vehicles would contribute to a reduction in noise levels.

This policy could have some limitations as it may restrict the types of businesses in certain locations. However, by ensuring office parking is only restricted in well-connected areas, businesses should remain accessible across the capital.

#### Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

### GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of office car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Table 145: T6.2 Office parking

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						+	O		O	?	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	?	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	?	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	I/D	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	L/GL	n/a	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>EQIA</b>																									
Short Term	O	O	O	?	n/a	O	O	O	?	O/-	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	n/a	+	+	+	O	O/-	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+	+	n/a	+	+	+	+	O/-	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L	L	L	L/GL	L/GL/W	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
<b>HIA</b>																									
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	n/a	n/a	L/GL
<b>CSIA</b>																									
Short Term				O					?																
Medium Term				+					?																
Long Term				+					?																
Direct / Indirect				I/D					I/D																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L					L/GL																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.9 T6.3 Retail parking

### Policy description

This policy aims to facilitate the restriction of retail car parking through promotion of car-free retail development proposals in the Central Activities Zone and areas within Public Transport Access Levels (PTAL) of 5 or 6. The policy supports the use of existing public provision and existing parking, such as town centre parking or office parking outside of working areas. It also provides maximum retail car parking standards that should be applied to all new retail development based on their location within London.

### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

### Appraisal of finalised policy

#### Social, economic and environmental effects

This policy promotes the restriction of retail car parking in inner London and the use of public transport. This would encourage the use of more sustainable transport patterns such as walking and cycling in these areas and therefore go some way towards reducing health inequalities across the city, also providing mental and physical benefits. The combination of car-free retail developments and local regeneration would therefore also positively contribute to enhancements in the character and townscape of the city.

This policy partly supports car-free retail development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided this could help to create better quality space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

The policy would improve accessibility, connectivity and sustainability as it promotes the partial restriction and management of retail car parking in order to reduce demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages more active and sustainable forms. This could negatively affect accessibility if disabled persons parking for Blue Badge holders is not provided.

Through the promotion of car-free retail development and sustainable modes of transport, implementation of the policy would have positive effects on objectives that aim to reduce emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand. This policy would also help to minimise noise and vibration levels and disruption as car-free developments would contribute to reduction in noise levels.

This policy may limit retail businesses' customer base by restricting parking availability and the ease at which these retail units can be accessed, potentially impacting their viability.

#### Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

### GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of retail car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Table 146: T6.3 Retail parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	O		O	O/-	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	O/-	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	O/-	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	I	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	L/ GL /W	n/a	n/a	n/a	L	L	L/ GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
<b>EQIA</b>																								
Short Term	O	O	O	?	n/a	O	O	O	?	-	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	n/a	+	+	+	O	-	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+	+	n/a	+	+	+	+	-	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L	n/a	L	L	L	L/ GL	L/ GL /W	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/ GL	L/ GL		n/a	n/a		n/a	n/a	n/a	n/a	L/ GL
<b>CSIA</b>																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



### 9.9.10 T6.4 Hotel parking

#### Policy description

This policy facilitates the restriction of hotel and leisure car parking in the Central Activities Zone and areas within Public Transport Access Levels (PTAL) between 4 and 6. It encourages car parking in these areas to be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing. This policy supports the location of hotel and leisure uses in accessible locations to encourage walking and cycling and public transport use and the provision of infrastructure for electric and Ultra Low Emission vehicles.

#### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). The draft policy made reference to, standards relating to cycle, residential, commercial, employment and retail parking but provided limited detail.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

#### Appraisal of finalised policy

##### Social, economic and environmental effects

This policy promotes the restriction of hotel car parking in inner London and encourages the use of more sustainable transport patterns such as public transport, walking and cycling. This would contribute towards a reduction in health inequalities across the city, also providing mental and physical benefits. Through the support of the delivery of car-free hotel developments and combined with local regeneration, implementation of the policy would have positive effects on the enhancement of the city character and townscape

The policy partly supports car-free hotel development, encouraging a modal shift to sustainable transport forms for non-operational needs. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided this could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

The policy would improve accessibility, connectivity and sustainability as it promotes the partial restriction and management of hotel and leisure car parking in order to reduce demand for travelling by

car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages healthier, active and more sustainable methods.

Through the promotion of sustainable modes of transport, such as electric and Ultra Low Emission vehicles, implementation of this policy would have positive effects on objectives that aim to reduce emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand. This policy would also help to minimise noise and vibration levels and disruption as car-free developments would contribute to reduction in noise levels.

By limiting hotel and leisure car parking, the policy may restrict the wider customer base by limiting the ease at which these businesses can be accessed. However the policy is only restrictive in areas with good transport access levels and does limit operational vehicles, disabled persons and taxi parking.

#### Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

#### GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of hotel car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Table 147: T6.4 Hotel parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	O		O	O/-	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	O/-	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	O/-	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	D	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	L/ GL / W	n/a	n/a	n/a	L	L	L/ GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
<b>EQIA</b>																								
Short Term	O	O	O	?	n/a	O	O	O	?	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	n/a	+	+	+	O	O	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+	+	n/a	+	+	+	+	O	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L	n/a	L	L	L	L/ GL	L/ GL / W	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
<b>HIA</b>																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	O
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/ GL	L/ GL		n/a	n/a		n/a	n/a	n/a	n/a	L/ GL
<b>CSIA</b>																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.9.11 T6.5 Non-residential disabled persons parking

#### Policy description

This policy facilitates the provision of disabled persons parking for non-residential elements of developments such as workplaces, educational institutions, retail, recreation and leisure and religious buildings. It provides standards for non-residential disabled persons parking and requires parking bays and enlarged bays to be designed in accordance with BS8300:2017 Volume 1.

#### Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). The draft policy made reference to, standards relating to cycle, residential, commercial, employment and retail parking but provided limited detail.

The draft policy has now been divided into separate policies covering:

- Car Parking (T6)
- Residential Parking (T6.1)
- Office Parking (T6.2)
- Retail Parking (T6.3)
- Hotel and leisure uses parking (T6.4)
- Non-residential disabled persons parking (T6.5)

#### Appraisal of finalised policy

##### Social, economic and environmental effects

The implementation of this policy supports inclusive access by promoting the provision of disabled persons parking, and accommodating the needs of Blue Badge Holders more broadly. This would contribute to the reduction of inequalities and discriminatory practices across the city, and could support a range of favourable health and wellbeing outcomes associated with increased access and community integration.

The provision of non-residential disabled persons parking would also support wider economic aims by ensuring businesses, shops and services remain accessible for those with limited mobility or long-term health conditions. This could play a role in ensuring that London's opportunities, facilities and services are accessible for all. Importantly, this policy supports policies T8, T9 and T10 by ensuring that disabled persons parking is provided across all types of land use.

##### Cumulative

This policy complements policies SI1 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

#### Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

#### GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

#### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse impact pathways present.

Table 148: T6.5 Non-residential disabled persons parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	O		+	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	O		+	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						+	O		+	n/a	n/a	n/a	n/a	O	n/a	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	I	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	n/a	n/a	n/a	n/a	L	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	O	O	n/a	n/a	O	+	+	+	n/a	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	O	n/a	n/a	O	+	+	+	n/a	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	O	n/a	n/a	+	+	+	+	n/a	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I/D	n/a	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L	n/a	n/a	L	L	L/ GL	L	n/a	n/a	n/a	L/ GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	+	+	+		n/a				?	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		n/a				?	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		n/a				?	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/ GL	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/ P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.9.12 T7 Freight and servicing

### Policy description

This policy facilitates sustainable freight movement in London through the consolidation, modal shift and promotion of deliveries at different times of day and night in order to reduce the impact on road congestion and air quality, and conflict with other uses. It also supports the Mayor and all relevant partners to improve safety and efficiency of freight and servicing across London.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The policy supports the delivery of goods and services through more efficient and sustainable freight movement. This ensures businesses receive the goods and services they require to prosper, thus enhancing economic productivity in the long term. Freight services indirectly support a range of supply chains and business networks that underpin economic activity and employment across the capital and would therefore positively affect economic vitality. Delivery services also provide employment for workers across different skills, and this policy could therefore protect and facilitate jobs and growth in this sector.

Implementation of this policy would encourage all development to support sustainable freight, including the provision of adequate space for off-street servicing and deliveries and the consolidation of deliveries to increase efficiency. Appropriate management of freight strategies could help to reduce traffic volume on the road network, and therefore potentially result in air quality improvements.

While this policy contributes to reducing the volume of vehicles on the road at peak times, it could increase levels at other times. The management of freight should therefore take into consideration local land use to ensure movement is appropriate, for example limiting night-time movement in residential areas or designing residential units away from delivery locations.

The implementation of this policy would improve accessibility and connectivity within and around London. Freight carried by rail and by water would relieve pressure on the road network. Coupled with this, the requirement for new development to be designed and managed so that deliveries can be received outside of peak hours, could contribute to reducing traffic volumes and congestion on regularly used roads.

#### Cumulative

This policy could conflict with policies D13 Noise and HC6 Supporting the evening and night-time economy which aim to minimise noise and vibration levels. This policy proposed shift to night deliveries could significantly impact noise and the existing night-time economy. The implementation of the policy would however complement policies E11 Sector growth opportunities and spatial clusters, E1 Offices, S1 Developing London's social infrastructure, H1 Increasing housing supply and SD1 Opportunity areas that support construction, employment and infrastructure development.

#### Recommendations

It was recommended that further information is provided on how freight traffic may be managed in order to reduce noise and vibration levels. Details on noise specific targets, as well as emissions thresholds, should be considered. It was also recommended that the impact of water freight should be more explicitly.

### GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that other policies in Plan addressed issues such as air quality.

The GLA also advised TfL had guidance of what should be included in Construction and Logistic Plans, and that where rail and water freight facilities are available, Transport for London's freight tools should be used when developing the site's freight strategy. In addition, the Mayor's Transport Strategy addresses issues of water freight and potential impacts

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Overall positive policy intended to maximise movement of freight by rail or water and to ensure that the air quality (and other environmental) impacts of freight growth are appropriately considered. Dependent on locations and scale, new freight logistics and transport sites could have adverse effects on features of internationally designated sites. However, this policy does not identify any specific location or extent of development.

Table 149: T7 Freight and servicing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						n/a	n/a		O	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	O	?/-
Medium Term						n/a	n/a		+	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	?/-
Long Term						n/a	n/a		+	++	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	?/-
Direct / Indirect						n/a	n/a		I/D	D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	n/a	I/D	I/D
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		L/ GL	GL /W	n/a	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	n/a	L/GL /W	L
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/+	O	+	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/+	+	+	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/+	+	+	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?/-
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	I	D	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
<b>HIA</b>																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		?/-
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		?/-
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		?/-
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 9.9.13 T8 Aviation

#### Policy description

This policy supports the expansion of London's airport capacity in order to support London's passenger and freight needs, recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status. However, it also emphasises that expansion must not come at the cost of environmental and health impacts on local and region wide residents. It requires the aviation industry fully meet its external and environmental costs, particularly in respect of noise, air quality and climate change.

#### Initial appraisal and recommendations

##### Social, economic and environmental effects

Airport activity and expansion underpins trade and supports economic prosperity in London and across the country. This policy supports improvements to airports and expansion where appropriate, ensuring the aviation industry continues its vital contribution to the economy, particularly in terms of freight transport and tourism. Airports are also large employers and can provide significant job opportunities in the local and wider economy. However, airport expansion can adversely affect local communities due to associated air and noise pollution and these adverse impacts can disproportionately harm more vulnerable local communities. Whilst not offering improvements to the environment, this policy does ensure that no airport expansions would result in additional harm to air quality, noise levels or biodiversity. Additionally, the support for restricting helicopter movement across the capital could help to reduce existing noise pollution.

This policy supports more sustainable use of existing airports to ensure current infrastructure is being used in the most efficient and sustainable way. This policy also supports the integration of aviation with other transport routes and promotes the use of more sustainable forms of transport. This would ensure airports remain accessible and vibrant and offer some benefits to the environment in the form of a reduction in private vehicle use.

##### Cumulative

This policy could conflict with policies G4 Local green and open space, G5 Urban greening, SI1 Improving air quality and D13 Noise which encourage environmental protection the promotion of community health and wellbeing and accessible and undisturbed spaces for all Londoners. The implementation of this policy would however complement policies T1 Strategic approach to transport, SD2 Collaboration in the Wider South East, E3 Affordable workspace and E11 Sector growth opportunities and spatial clusters that support connectivity, development and employment within central and outer London. The policies also align to promote London as a global economic city which is an attractive place to live and work.

##### Recommendations

It was recommended that the policy could further reference inclusive design as well as potential job creation of relevant supply chains and surrounding logistics, and how these jobs can be accessed. This could include further detail on inclusive employment practices, training and skill creation

It was also recommended the policy provided further detail on integrated connectivity as well as how the aviation industry will meet its external and environmental costs particularly in respect of air quality.

#### GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity. The GLA advised that other policies within the Plan address issues such as air quality and inclusive design, and that integrated connectivity will be specific to individual airports and access arrangements.

The GLA further advised that issues such as potential job creation of relevant supply chains and surrounding logistics, how these jobs can be accessed, and inclusive employment practices, training and skill creation were more appropriate for the Mayor's Economic Development Strategy as well as borough 's local plans.

#### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

#### Implications for the HRA

Outcome of HRA screening showed potential implications to designated sites. It is acknowledged that air traffic is a large contributor to atmospheric pollution and airport growth could therefore have an adverse effect. However, the policy specifically acknowledges this. This policy does not in itself provide for any location, type or quantum of aviation development.

It is recommended that some of the policy text is strengthened with regard to protecting internationally important wildlife sites. The term 'environmental costs' implies that whatever environmental damage that might result would/could be addressed, whereas for European sites the airport operator/promoter would need to prove 'no alternatives' and 'imperative reasons of overriding public interest' first. 'Acknowledging' impacts and meeting 'environmental costs' would not necessarily be compliant with the Habitats Directive.

This is a main aspect for discussion for the HRA report.

Table 150: T8 Aviation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		O	+	O	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O
Medium Term						+	n/a		+	+	+	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O
Long Term						+	n/a		+	++	++	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O/+
Direct / Indirect						I/D	n/a		I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I/D	n/a	n/a	I/D	n/a	I/D	n/a	D
Temporary / Permanent						T/P	n/a		T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	P	n/a	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	n/a		L/GL /W	L /GL	L/GL /W	n/a	n/a	L /GL	L /GL	L /GL	L /GL	n/a	n/a	L /GL	n/a	L	n/a	L /GL
<b>EQIA</b>																								
Short Term	n/a	O	O	n/a	n/a	n/a	n/a	n/a	O	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	n/a	+	O/-	n/a	n/a	n/a	n/a	n/a	+	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	n/a	+	-	n/a	n/a	n/a	n/a	n/a	+	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O/+
Direct / Indirect	n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a	I/D	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	D
Temporary / Permanent	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	L/GL /W	L /GL	n/a	n/a	n/a	n/a	n/a	L/GL /W	L /GL	n/a	n/a	n/a	L /GL	L /GL		L /GL	n/a	n/a	n/a	n/a	n/a	n/a	L /GL
<b>HIA</b>																								
Short Term	n/a	n/a	-		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	n/a	-		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	n/a	-		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O/+
Direct / Indirect	n/a	n/a	I/D		n/a				n/a	n/a				D	I/D		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L /GL		n/a				n/a	n/a				L /GL	L /GL		n/a	n/a		n/a	n/a	n/a		L /GL
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.



## 9.9.14 T9 Funding transport infrastructure through planning

### Policy description

This policy supports the funding of strategically-important infrastructure through the Mayoral Community Infrastructure Levy (MCIL), borough's own Community Infrastructure Levies, and planning obligations to mitigate impacts from development.

### Initial appraisal and recommendations

#### Social, economic and environmental effects

The implementation of this policy would support the funding of strategic infrastructure to improve access to opportunities and services across the capital. Good quality cycling and walking infrastructure can encourage healthier lifestyles by supporting more physical activity through the provision of suitable spaces and routes for people to exercise in. This policy would improve accessibility and connectivity within and around London, and by its definition support the provision of infrastructure. By providing extended connections across London and to key centres outside London, Crossrail will help to improve accessibility to services and opportunities, overcome severance and facilitate the provision of supporting infrastructure such as walkways and cycleways.

Funding transport infrastructure through planning supports strategic infrastructure to unlock housing capacity at the regional and sub-regional level. Crossrail will help to support higher density development in new parts of the city and wider region, due to associated transport accessibility. This policy therefore actively promotes sustainable land use and would contribute to the delivery of housing.

The implementation of this policy would deliver the strategic infrastructure to unlock economic growth at a regional and sub-regional level. It supports wider economic prosperity in the Wider South East and would increase the proportion of labour within commuter distance of London, increasing the pool of skilled labour. This would help overcome barriers to unemployment and therefore have a positive effect on skills provision, economic vitality and access to employment opportunities.

By supporting wider improvements to the public transport network, this policy would help to reduce reliance on private vehicle use and therefore mitigate against climate change and promote more sustainable modes of transport. This policy suggests that where developments give rise to impacts on the transport network, transport assessments and mitigation will be required to ensure the transport provision remains sufficient and appropriate.

#### Cumulative

This policy would complement policies E11 Sector growth opportunities and spatial clusters, SI3 Energy infrastructure, SI5 Water infrastructure, SI13 Sustainable drainage, SD1 Opportunity areas and SD10 Strategic and local regeneration which support economic growth and promotion of sustainable integrated infrastructure across London. The combination of these policies could also improve social integration and physical activity by providing opportunities through transport infrastructure, such as cycle lanes and associated community areas.

### Recommendations

It was recommended that further information was provided on how transport infrastructure might meet the needs of all residents, such as those in disadvantaged areas within the city and wider region. Details on accessibility, affordability, design and supporting infrastructure such as lighting should be considered. It was also recommended that further detail was provided on the immediate economic effects of the policy, for example the direct employment, education and training opportunities these strategic projects offer.

### GLA response

Although no changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that it was not appropriate for a strategic Plan to cover the recommendations raised.

### Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

### Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking adverse impact pathways present.

Table 151: T9 Funding transport infrastructure through planning

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term						O	n/a		+	?	+	?	O	?	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term						+	n/a		+	+	+	?	+	?	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term						+	n/a		++	++	++	?	+	?	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect						I	n/a		D	I	D	D	I	I/D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	n/a		P	T/P	P	P	P	T/P	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	n/a		L/GL /W	L/GL /W	L/GL /W	L	L/GL /W	L	n/a	L/GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	
<b>EQIA</b>																									
Short Term	O	O	O	n/a	+	+	n/a	O	O	?	O	n/a	O	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Medium Term	+	+	+	n/a	+	+	n/a	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Long Term	+	+	+	n/a	+	+	n/a	+	+	++	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Direct / Indirect	I	I	I	n/a	I	I	n/a	I	I	I	D	n/a	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Temporary / Permanent	P	P	P	n/a	P	T/P	n/a	P	T/P	T/P	P	n/a	P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W	n/a	L/GL /W	L/GL /W	n/a	L/GL /W	L/GL /W	L/GL /W	L/GL /W	n/a	L/GL /W	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
<b>HIA</b>																									
Short Term	?	?	?		+				+	n/a				?	n/a		n/a	n/a		n/a	n/a	n/a		?	
Medium Term	?	?	?		+				+	n/a				?	n/a		n/a	n/a		n/a	n/a	n/a		?	
Long Term	?	?	?		+				+	n/a				?	n/a		n/a	n/a		n/a	n/a	n/a		?	
Direct / Indirect	I	I	I		I				D	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		I/D	
Temporary / Permanent	P	P	P		P				T/P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P	
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/GL /W		L/GL /W				L/GL /W	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L/GL	
<b>CSIA</b>																									
Short Term				?					+																
Medium Term				?					+																
Long Term				?					+																
Direct / Indirect				I/D					I																
Temporary / Permanent				T/P					P																
Local / Greater London / Wider Region / Global				L/GL					L/GL /W																

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9.10 Funding the London Plan

### 9.10.1 DF1 Delivery of the plan and planning obligations

#### 9.10.2 Policy description:

This policy supports a consistent approach to planning obligations, as part of development proposals and land acquisition. Policies in Development Plans and the London Plan are tested for viability to consider the cumulative impact of development. Viability testing should therefore only be undertaken on a site-specific basis where clear barriers to delivery are present. Individual assessments of viability have caused uncertainty in the development process, and can be used to undermine planning requirements and the delivery of appropriate infrastructure. The policy supports that if an applicant wishes to make the case for a viability assessment, it should be supported by robust evidence, and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

#### Initial appraisal and recommendations

##### Social, economic and environmental impacts

The implementation of this policy would encourage a more standardised approach to planning obligations, which would in turn provide greater certainty for stakeholders within the development process. This could include reduced risks for developers, and greater transparency and negotiating power for local authorities and communities.

The policy supports that site-specific viability should only be undertaken in instances where significant barriers to delivery exist. By encouraging a robust evidence review of the key challenges, this policy could help to address and overcome barriers to delivery, and unlock land for development. This could help to speed up the planning process, and contribute to providing much needed housing and infrastructure in the capital. Site-specific viability assessments could help to bring forward and optimise brownfield land, encouraging sustainable development patterns.

The policy supports both applicants and decision makers in considering the strategic need for affordable housing, and public transport improvements as part of the development. It also encourages consideration for the role large sites can play in delivery key infrastructure, including health, education, cultural and leisure facilities and affordable workspace. The early consideration of key infrastructure will contribute to balanced and inclusive development, ensuring residents have access to a range of services and opportunities.

##### Cumulative

Implementation of this policy would complement those policies that facilitate housing delivery, infrastructure provision and viability testing.

##### Recommendations

It was recommended that some minor wording amendments to the supporting text were made to ensure greater clarity. It was also suggested that the policy could reference the role of density in bringing forward brownfield sites, and how this could impact on viability.

#### GLA Response

The GLA amended the supporting text to provide greater clarity. They advised that it was implicit in the rest of the Plan that development should be focused on brownfield land however policy GG2 more

explicitly set this out. They also advised that the viability study that accompanied the Plan clearly showed that the policies within the Plan were viable and policy DF1 was explicit that viability issues should be exceptions to the rule.

Table 152: DF1 Delivery of the plan and planning obligations

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term						+	n/a		n/a	n/a	+	?	?	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	n/a		n/a	n/a	+	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						++	n/a		n/a	n/a	+	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a		n/a	n/a	I	I	I	n/a	I	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						P	n/a		n/a	n/a	P	P	P	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	L	L	L	n/a	L	L	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	?	n/a	+	?	n/a	n/a	n/a	n/a	+	?	?	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I	n/a	I	I	n/a	n/a	n/a	n/a	I	I	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	P	n/a	P	P	n/a	n/a	n/a	n/a	P	P	P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	L	n/a	n/a	n/a	n/a	L	L	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>HIA</b>																								
Short Term	n/a	n/a	?		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		I				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 10 Next Steps

---

This IIA Report is open for consultation alongside the draft London Plan. Upon completion of the consultation period, the consultation responses will be collated and analysed. The findings will be used in preparation of, and where appropriate revision of, the final London Plan.

A Post Adoption Statement is a requirement under the SEA Regulations and is published after the Mayor publishes the final version of the London Plan. This statement outlines how the IIA has influenced the drafting of the London Plan and will set out how the consultation responses were addressed in finalising the London Plan. The Statement will meet the requirements of the SEA Regulations, but will also reflect the wider scope of the assessment in respect of its coverage of sustainability.

Any comments relating to the findings of the IIA presented in this report please email to [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk) or send written comments by 2 March 2018 to:

Integrated Impact Assessment  
Greater London Authority  
The London Plan Team  
City Hall  
Post Point 18  
FREEPOST RTJC-XBZZ-GJKZ  
London SE1 2AA



## **Appendix A**

Glossary of terms and list of abbreviations





Term	Description
Accessible housing	The construction or modification of housing to enable independent living for people with disabilities.
Active Transport	Transportation of people using personal physical activity. For example, walking or cycling.
Active Transport Access Levels (ATAL)	A detailed and accurate measure of the accessibility of a point to the active transport network, taking into account access time and service availability.
Agent of change principle	The principal that if nuisance developments are in place before residential building, the residential building would be responsible for paying for soundproofing.
Air Quality Assessments	Active data collection and modelling to identify any impacts to air pollution on
Air Quality Positive or Neutral	Term to describe new buildings which actively contribute to a progressive reduction in the total amount of London's emissions and associated exposure.
Bakerloo Line Extension	Proposed extension of the Bakerloo Line south-east through Old Kent Road towards Lewisham.
Blue Badge Holders	People with disabilities, who can legally park in disabled parking bays and on-street parking when a blue badge is displayed.
Blue-ribbon Network	The Blue-Ribbon Network (BRN) is London's strategic network of water spaces and covers the River Thames, canals, tributary rivers, lakes, reservoirs and docks alongside smaller waterbodies. The network is of cross cutting and strategic importance for London; every London borough contains some element of the network – 17 border the Thames and 15 contain canals. The nature of waterbodies is that there are linked, natural or semi natural systems, therefore the concept of the network is of vital importance.
Brownfield site	A brownfield site is an area of land previously used for industrial or commercial uses.
BS8300:2017 Volume 1	British Standard for the design of buildings to provide accessibility to disabled people, which includes: wheelchair users, partially sighted and blind people, people who have hearing impairments, cognitive impairments and poor manual dexterity.
Build to rent	Investment scheme where government shares risk or bridged finance with developers to help schemes be built and managed to let.
Central Activity Zone (CAZ)	The Central Activities Zone (CAZ) covers London's geographic, economic and administrative centres. It brings together the largest concentration of London's financial and globally-oriented business

Term	Description
	services. Almost a third of all London jobs are based there and, together with the Northern Isle of Dogs (including Canary Wharf), it has historically experienced the highest rate of growth in London.
CIBSE Code of Practice	Published set of aims and standards for developers on how heat networks should be specified to be efficient and cost-effective for occupiers.
Circular Economy	A circular economy is an industrial system in which the potential use of goods and materials is optimized and their elements returned to the system at the end of their viable life cycles
Circular Economy Statements	Statements that detail how waste will be minimised, managed and sorted for strategic developments.
Cladding	The application of one material over another to provide a skin or layer. In construction cladding is used to provide a degree of thermal insulation and weather resistance.
Community Infrastructure Levy (CIL) (Mayoral)	A Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. In addition to local authorities CILs, The Mayor of London is also empowered to charge a CIL for strategic transport.
Cooling hierarchy	The ranking of cooling designs which don't rely upon the use of air conditioning systems
Crossrail 2	Crossrail 2 is a new proposed railway linking the national rail networks in Surrey and Hertfordshire via an underground tunnel through London.
Digital Connectivity	Digital connectivity is about access to fast and reliable internet connection (fixed or mobile) which enables users to benefit from smart and digital services. It is the 'fourth utility', an everyday necessity alongside water, gas and electricity.
Digital Infrastructure	Digital infrastructure includes data, software and the mechanisms needed to enable them to work together seamlessly so that they can be shared, managed, combined and collaborated.
Drainage hierarchy	Categorization of preferred methods of drainage. Management of run-off as close to source as possible is preferred.
Fuel poverty	Being unable to afford to keep one's home adequately heated
Future-proof	Future-proofing involves anticipating the future and developing methods of minimizing the effects of shocks and stresses of future events.

Term	Description
Geodiversity	The variety of rocks, minerals, fossils, landforms, sediments and soils in an area, together with natural processes, such as erosion and landslips, that may be active.
Green Belt	The London Green Belt is a region designated to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
Greenfield Run-off Rate	The rate at which surface water exits a greenfield site before potential development. Rates are usually estimated for 1 in 1 year events and 1 in 100 year events.
Healthy Life Expectancy	The length a person will live in good health.
Healthy Streets	The approach to providing high-quality, pleasant and attractive environments to encourage Londoners to walk, cycle and use public transport more.
Heat Network Priority Areas	Areas which are deprived of efficient heating.
Heat networks	Sometimes called district heating – is a distribution system of insulated pipes that takes heat from a central source and delivers it to a number of domestic or non-domestic buildings. The heat source might be a facility that provides a dedicated supply to the heat network, such as a combined heat and power plant; or heat recovered from industry and urban infrastructure, canals and rivers, or energy from waste plants.
Housing need	Housing ‘need’ is an indicator of existing deficit: the number of households that do not have access to accommodation that meets certain normative standards.
Hydraulic Fracturing	A well stimulation technique in which rock is fractured by a pressurized liquid. The process involves the high-pressure injection of 'fracking fluid' into a wellbore to create cracks in the deep-rock formations through which natural gas, petroleum, and brine will flow more freely.
Inclusive design	Products, services and environments that include the needs of the widest number of consumers
Indices and Multiple Deprivation	The Index of Multiple Deprivation is the official measure of relative deprivation for boroughs of London.
Local authority	The administrative body of local government.
Local plan	A plan that sets out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also

Term	Description
	a critical tool in guiding decisions about individual development proposals
Locally Significant Industrial Sites (LSIS)	Areas designated for their important use as industrial sites, which can include hybrid or flexible B-class suitable for SMEs.
Low carbon economy/ Zero carbon economy	An economy that is based on low carbon power sources and has a minimal output of greenhouse gas emissions.
Mayor’s Environment Strategy	The Mayor's Environment Strategy sets out his intentions for the London environment. It explains how partners will bring the plan into reality over the next 20 years.
Mayor’s Transport Strategy	The Mayor's Transport Strategy sets out his intentions for London transport. It explains how Transport for London (TfL) and partners will bring the plan into reality over the next 20 years.
Metropolitan Open Land (MOL)	Designation used only within London. Land designated MOL is afforded the same level of protection as the Metropolitan Green Belt. Designation is intended to protect areas of landscape, recreation, nature conservation and scientific interest which are strategically important.
Mindfulness	The quality or state of being conscious or aware of something.
Natural capital	The world’s stock of natural resources, which includes geology, soils, air, water and all living organisms.
Night-time economy	The exchange of goods and service during the night-time. Businesses such as restaurants, cinemas and nightclubs
Non-communicable Disease	An NCD or non-communicable disease is a disease that is not infectious and cannot be transferred to others. Some of these are diseases that progress slowly or cause chronic symptoms while others progress very rapidly. The World Health Organization estimates that NCDs are the leading cause of death worldwide, accounting for 60 percent of deaths in all humans.
Opportunity Area Planning Frameworks	Documents used to specify how an opportunity area can be developed, considering how key development sites fit within a local policy context.
Opportunity Areas	Opportunity Areas are the capital’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing, or improving, public transport.
Public realm	Any publicly owned streets, pathways, right of ways, parks, publicly accessible open spaces and any public and civic building and facilities.
Public Transport Access Levels (PTAL)	PTALS are a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. The method is essentially a

Term	Description
	way of measuring the density of the public transport network at any location within Greater London.
Quiet areas	A quiet area is not one that is silent, but rather one that is undisturbed by unwanted or harmful outdoor sound created by human activities (i.e. environmental noise).
Social capital	The value of social networks, bonding similar people and bridging between diverse people.
Social Infrastructure	Social Infrastructure includes a wide range of services and facilities including: Health, Education, Community, Cultural, Play, Recreation and sports facilities, Faith and Emergency facilities.
Special Policy Areas	Areas that are recognised for their special local distinctiveness, particularly relating to their land uses.
Sport England Standards	British Standards and codes of practice relating to the accessibility of sports facilities, especially for their use by disabled people.
Strategic Industrial Locations (SIL)	Protected industrial areas which due to their scale and relative homogenous character can accommodate activities which elsewhere might raise tensions with other land uses. They are protected as industrial land is currently being released almost three times the recommended amount.
Strategic Outer London Development Centres (SOLDC)	Economic locations of various scales with specialist functions/strengths which already function or can potentially function at a more than sub regional level and generate significant, specialist growth considerably above existing outer London trends.
Strategic views	Long distance views of important visible monuments that are to be safeguarded by viewing corridors.
Supporting infrastructure	Additional infrastructure, usually services, which enhance the community. For example, housing developments require doctors or schools.
Thames strategies	A collection of strategies issued by Thames-side boroughs and the City Corporation which formulate policies and strategies for their area.
Ultra-Low Emission Vehicles (ULEV)	ULEVs are vehicles that: use low carbon technologies, emit less than 75g of CO <sub>2</sub> /km from the tailpipe, are capable of operating in zero tailpipe emission mode for a range of at least ten miles.
Ultra-low Emissions Zone	An area within which all cars, motorcycles, vans, minibuses, buses, coaches and heavy goods vehicles (HGVs) will need to meet exhaust emission standards (ULEZ standards) or pay a daily charge to travel.
Urban Greening Factor	A planning policy tool adapted to encourage urban greening. Green Space Factor GSF schemes work by assigning a factor of between 0 and 1 for various surface cover types, with sealed surfaces given 0 and the most natural cover, 1. To calculate a GSF for a site, the

Term	Description
	factor for a particular surface cover is multiplied by its area. This is repeated for each surface cover type. The multiplied sums are added together and then divided by the overall site area to give an overall GSF score for a site of between 0 and 1.
Urban Heat Island Effect	An urban area or metropolitan area that is significantly warmer than its surrounding rural areas due to human activities.
Vacant building credit (VBC)	A financial 'credit' equivalent to the existing gross floor space of relevant vacant buildings when the local planning authority calculates affordable housing contributions.
Walk London Network	Integrated network of walking paths across London providing routes designed to be accessible by public transport.
Waste hierarchy	The ranking of waste management options according to what is best for the environment.
Water Management Plans	A plan that addresses the collection and disposal of waste, including storage and recycling.
Zero carbon	The result of no net release of carbon dioxide into the atmosphere.

Abbreviation	Description
ATAL	Active Transport Access Levels
BAME	Black, Asian and minority ethnicities
CAZ	Central Activities Zone
CIBSE	Chartered Institute of Building Service Engineers
CSIA	Community Safety Impact Assessment
EqIA	Equality Impact Assessment
FE	Further Education
GLA	Greater London Authority
HE	Higher Education
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LGBTQ	Lesbian, Gay, Bisexual, Transsexual, Questioning
LSIS	Locally Significant Industrial Sites
LVMF	London View Management Framework
MOL	Metropolitan Open Land
NHS	National Health Service
NIOD	Northern Isle of Dogs
OAPF	Opportunity Area Planning Frameworks

OUV	Outstanding Universal Value
PTAL	Public Transport Accessibility Level
SEA	Strategic Environmental Appraisal
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Locations
SINCs	Site of Importance for Nature Conservation
SME	Small and Medium Enterprises
SOLDC	Strategic Outer London Development Centres
TfL	Transport for London
UFG	Urban Greening Factor
UGF	Urban Greening Factor
UHI	Urban Heat Island
ULEZ	Ultra Low Emissions Zone
VBC	Vacant Building Credit
WHS	World Heritage Sites
WSE	Wider South East

## Appendix B

### Extended Baseline Information



## 5 BASELINE INFORMATION AND KEY SUSTAINABILITY ISSUES IN LONDON (TASKS A2 & A3)

This chapter sets out the baseline data across all IIA topics. The baseline data has been aggregated into themes representing three dimensions of sustainable development - social, economic and environmental. Significant interlinkages exist between the thematic issues and cross-cutting issues such as air quality, health and equality which have been identified across many sustainability topics and addressed in an integrated way which can assist in the development of coherent policy guidance to inform the London Plan review process.

### 5.1 Overview

- 5.1.1 The baseline data for the IIA includes existing relevant environmental and sustainability information from a range of sources which is both quantitative and qualitative. This information provides the basis for assessing the potential impact of the proposed policies in the new London Plan and will aid development of appropriate mitigation measures, together with future monitoring indicators.
- 5.1.2 The baseline information in this chapter is set out in relation to topics relevant to each of the individual assessments which comprise the IIA. It can be seen from Figure 5.1 that the majority of these topics are applicable to more than one of the assessments. This table is an indicative marker of different inter-relationships between sustainability topics and the individual assessments which together make up the IIA.

Figure 5.1: Key issues (and subsequent topic areas) for baseline

Topic	Sustainability Appraisal (SA)	Strategic Environmental Assessment (SEA)	Equalities Impact Assessment (EqIA)	Health Impact Assessment (HIA)	Community Safety Assessment (CSA)
Demographic	.		.	.	.
Social Integration and Inclusion	.		.	.	.
Health and Health Inequalities	.		.	.	
Crime, Safety and Security	.		.	.	.
Housing	.		.	.	
Sustainable Land Use	.	.	.	.	

Topic	Sustainability Appraisal (SA)	Strategic Environmental Assessment (SEA)	Equalities Impact Assessment (EqIA)	Health Impact Assessment (HIA)	Community Safety Assessment (CSA)
Connectivity	.	.	.	.	.
Accessibility	.	.	.	.	.
Economic Competitiveness	.		.		
Employment	.		.	.	
Education and Skills	.		.	.	
Culture	.		.	.	
Air Quality	.	.	.	.	
Climate Change	.	.	.	.	
Energy use and supply	.	.	.	.	
Water Resources and Quality	.	.		.	
Flood Risk	.	.		.	
Natural Environment and Natural Capital	.	.	.	.	
Townscape, Landscape and Public Realm	.	.	.	.	.
Historic Environment	.	.	.	.	
Geology and Soils	.	.		.	
Materials and Waste	.	.		.	

Topic	Sustainability Appraisal (SA)	Strategic Environmental Assessment (SEA)	Equalities Impact Assessment (EqIA)	Health Impact Assessment (HIA)	Community Safety Assessment (CSA)
Noise and Vibration	•	•	•	•	

5.1.3 For each topic key issues have been identified. These have been used to inform the development of IIA objectives against which the emerging new London Plan will be assessed.

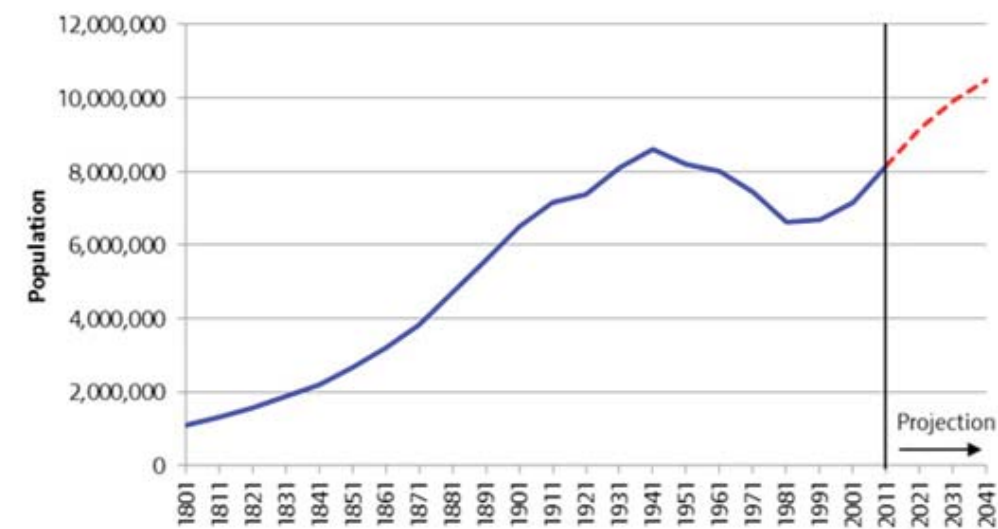
## Social

### 5.2 Demographic Change

The growth and composition of the population

- 5.2.1 London is experiencing huge population growth. In 2015, London’s population peaked at 8.6 million people, equalling the previous peak which was last reached in 1939.
- 5.2.2 The Further Alterations to the London Plan, one of the most significant changes to the 2011 Plan, were a result of the significant increase in the projected growth that became apparent as a result of the release of 2011 Census data. The census showed that London’s population has been increasing at the average of 87,000pa in the previous decade, which is nearly double the rate of that had been assumed previously and planned for in the 2011 London Plan. Current population projections suggest London’s population is likely to continue to grow and anticipates an additional 3 million more people by 2050, reaching 10.5 million by 2041<sup>2</sup>, the equivalent of c70,000 pa.

**Figure 5.2: London’s population, every ten years between 1801 and 2011 and projection to 2041**



ONS Census (historic data), GLA 2015 trend-based population projections (long-term migration scenario)

#### Age

- 5.2.3 London is a relatively ‘young’ and this is considered to contribute to its economic strength. The median age in London is 34 years old compared to the national average of 39 years<sup>3</sup>. This is a result of the large numbers of young adults who come to work or study in London and, in the past, the tendency for Londoners to relocate outside the capital from their mid-30s onwards.

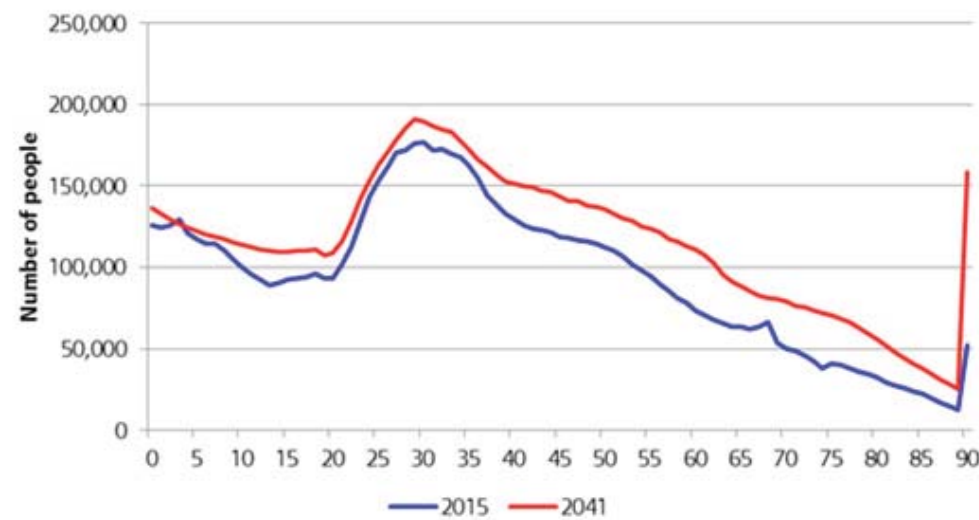
<sup>2</sup> ONS Census (historic data), GLA 2015 trend-based population projections (long-term migration scenario)

<sup>3</sup> ONS Mid-year Estimates 2014



- 5.2.4 It is not anticipated that London’s growth will be evenly distributed between age groups. As Figure 5.3 shows the working age population (16 to 64) is projected to rise by 1 million between 2015 and 2041 while the over 65s are expected to increase by 600,000 persons, an increase of 65 per cent from 2011 - driven by increasing life expectancy, the large cohort of baby-boomers passing 65 and a significant increase in people aged over 85 years of age. Although the proportion over 90 years old is still a smaller proportion of the total population than in the rest of England, it is expected to more than double to make-up 1.5 per cent of London’s population by 2041<sup>4</sup>. The number of older person households varies significantly by borough. Outer London boroughs have the oldest populations (13 per cent compared to inner London’s 9 per cent) with Havering, Bromley and Bexley having the largest proportion of their population aged 65+ in 2015 (excluding City of London).
- 5.2.5 London’s school-age population is also growing and is projected to number nearly 1.4m by 2041, (up from 1.2 million in 2014)<sup>5</sup>.
- 5.2.6 Overall there are slightly more males than females, with more males in most age groups up to about 40 and more women in age groups aged 50 and over<sup>6</sup>.

**Figure 5.3: London’s age structure 2015 and 2041**



ONS Census, GLA 2015 trend-based population projections (long-term migration scenario)

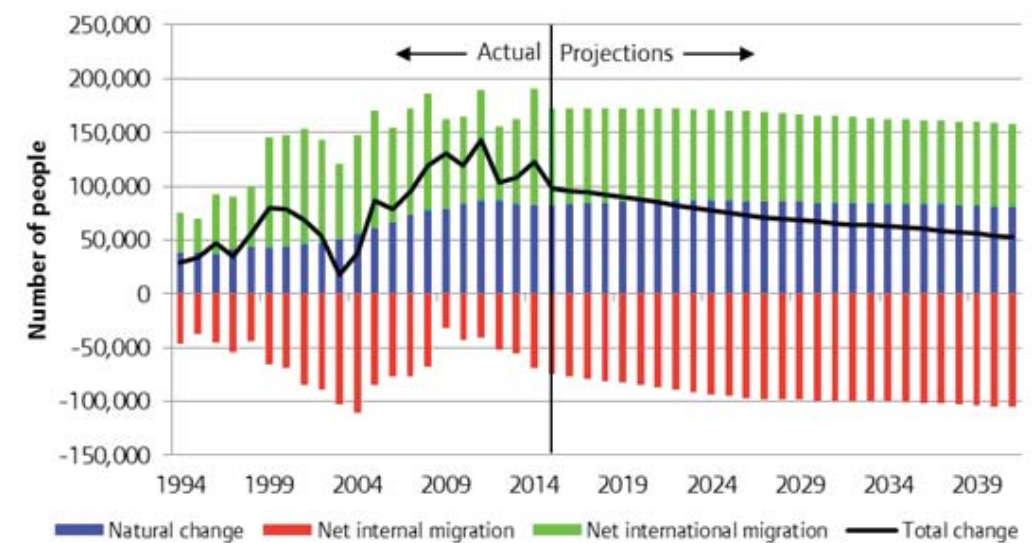
**Migration and Natural Change**

- 5.2.7 London’s population growth is a function of the interplay between international and internal migration and natural change. Natural change, a function of age structure, is a significant contributor to London’s population growth (c70,000 pa). This high level of births reflects the relatively young age profile of internal and international migrants. The number of births peaked in 2012 at 134,000, however their impact will be felt into the future as these cohorts move through the education system before entering the world of work and have particularly requirements in terms of social infrastructure needs.

<sup>4</sup> ONS Census, GLA 2015 trend-based population projections (long-term migration scenario)  
<sup>5</sup> Ibid  
<sup>6</sup> Ibid

- 5.2.8 The other driver of population growth is migration. In 2014, approximately half of all migration to London (49.6 per cent) was from overseas, with the other half from the rest of the UK. Migrants from overseas tend to go to inner London, whereas there is a roughly even split of migrants from the rest of the UK going to inner and outer London. Meanwhile, the outflow of people from London (which includes migrants who have already arrived in London) shows that they are more likely to go to the rest of the UK. In fact, there is a net outflow of people from London to the rest of the UK, whereas in contrast there is a net inflow of international migrants to London<sup>7</sup>.
- 5.2.9 London currently has net domestic out migration of 50,000 pa, which is considered to be suppressed when compared to pre-economic crisis levels of 70-80,000 pa in the years leading up to the economic crisis. This drop in out migration is likely to have been in part the result of a slowing of the housing market, and in part due to London’s job market proving relatively resilient compared to those in other parts of the UK, leading to more people staying in London. Net domestic outflows have begun to increase again as the economy has recovered, but it is not yet clear what impact further economic recovery / recession will have on future migration patterns. In terms of international migration, London has an international net in migration of c70-90,000 pa which again is probably a reflection of the relatively strong job market in London and the UK’s stability<sup>8</sup>. However, the referendum decision to leave the EU in spring 2016 may change migration patterns and it is hard to say at this time how these will be affected, particularly in the longer term.

**Figure 5.4: Components of change for London’s population, 1994 to 2041**



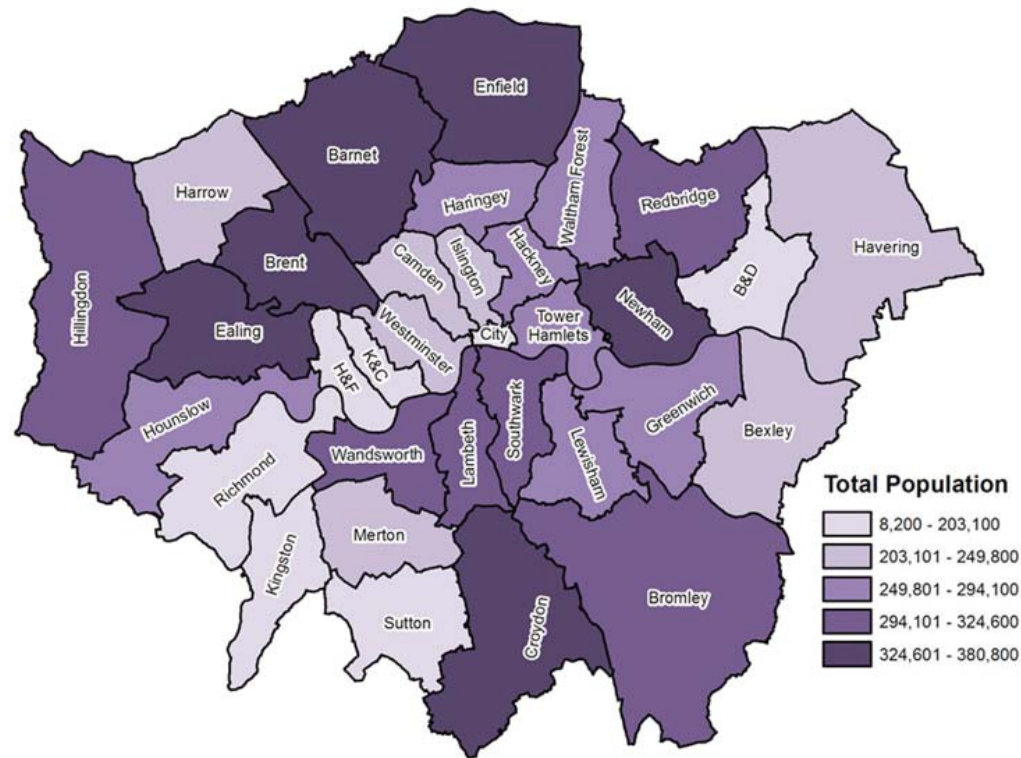
ONS Mid-Year Estimates, GLA 2015 trend-based population projections (long-term migration scenario)

<sup>7</sup> GLA Economics (2016) Economic Evidence Base, Chapter 8  
<sup>8</sup> Ibid

**Distribution**

5.2.10 Figure 5.5 shows the current spatial distribution of London’s population. The geographically larger outer London boroughs tend to have a greater number of residents than the inner boroughs with the notable exception of Newham. In 2011 this uneven distribution consisted of 4.97million (60 per cent) in outer London and 3.29 million (40 per cent) in inner London<sup>9</sup>.

**Figure 5.5: Total population by London borough, 2015**

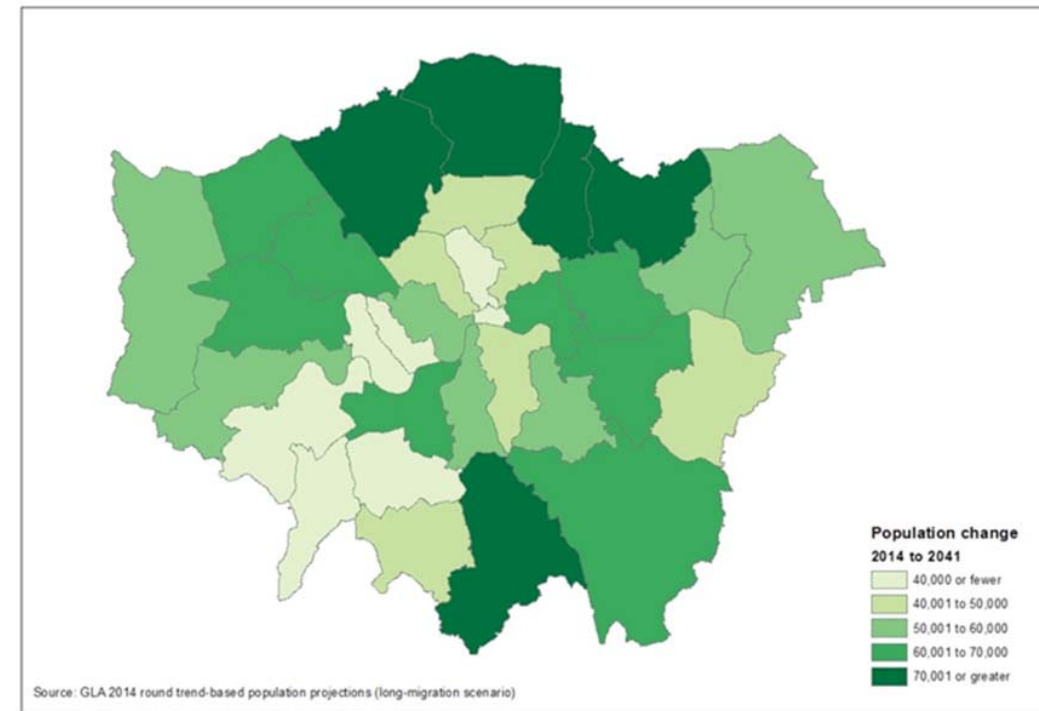


5.2.11 Trend-based population projections suggest that there will be strong growth in outer London of c500,408 people (65 per cent of total growth) compared to inner London of c266,000 people (35 per cent of total growth) as per Figure 5.6. However, population projections based on housing targets as set out in the 2013 Strategic Housing Land Availability Assessment (SHLAA), which take account of the capacity of land to accommodate housing, are relatively low for outer London at 193,000 people (45 per cent of total growth) compared to inner London of 231,000 people (55 per cent of total growth) for the period up to 2036<sup>10</sup>. Based on the 2013 SHLAA, the majority of the growth in outer London will be in Barnet of 23,305 units, Barking & Dagenham at 15,348 units, Croydon at 15,164 units and Brent at 11,165 units<sup>11</sup>.

5.2.12 Policies in the new London Plan, particularly in informing the underlying assumptions of the new SHLAA, will potential alter the spatial distribution of this growth.

<sup>9</sup> ONS Census 2011  
<sup>10</sup> Nb the revised 2016 SHLAA will provide updated figure up to 2041  
<sup>11</sup> Mayor of London (2013) Strategic Housing Land Availability Assessment, GLA

**Figure 5.6: Trend based population distribution 2014 – 41**



<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Significant increase in the population</li> <li>• Young profile</li> <li>• Ageing and more diverse population</li> <li>• Uncertainty of the composition of the population, including migration patterns</li> </ul>
<b>Opportunities</b>	To ensure that the benefits of growth are more fairly distributed
<b>Implications of the Plans and Programmes Review</b>	Accommodating growth must be a central objective of the new London Plan however due to recession and referendum decision to leave the EU has led to increased uncertainty as to the relative scale of the growth, the composition of the resultant population and how that growth might be distributed across London.
<b>Suggested IIA Objectives</b>	<p>To make the best and most efficient use of land so as to support sustainable patterns and forms of development</p> <p>To ensure London has socially integrated communities which are strong, resilient and free of prejudice</p>

### 5.3 Social Integration and Inclusion

One's ability to feel able to / want to participate in societal activities

#### Diversity

- 5.3.1 By 2041, 16 per cent of London's population is projected to be 65 and over compared to 11.6 per cent in 2015<sup>12</sup>. With a higher life expectancy than the rest of England, the city needs to prepare to meet the needs of this growing group. Older people in London have a higher life expectancy than the national average with men in London at 80.3 years compared with 79.5 years nationally and women in London average life expectancy at 84.2 years compared to 83.2 years nationally<sup>13</sup>. Older people report higher life satisfaction and happiness than other age groups<sup>14</sup>. However, as with any group there are likely to be huge variations of situations. Some studies suggest that older Londoners are more likely to be socially isolated than any other group, with 18 per cent of pensioners in London living in poverty and material deprivation compared to 12 per cent in the rest of England and many remain digitally excluded<sup>15</sup>.
- 5.3.2 London saw 1.16m (14 per cent of residents) reporting that they had a long-term health problem or disability which limited their day-to-day activities. This proportion was below the national average (18 per cent) and was lower than every other region in England and Wales.<sup>16</sup> This was mostly due to London's comparably younger age structure. When looking at individual age groups the rate of Londoners with limiting long-term health problems did not vary significantly from the national average.
- 5.3.3 45 per cent of Londoners identify themselves as White British with 40 per cent from Black, Asian and minority ethnic (BAME) backgrounds with a further 15 per cent of Londoners identifying as 'White Other'. 26 of the 30 local authorities with the most ethnically diverse populations in the UK are in London<sup>17</sup>. This makes London's population more diverse than any other UK city or region. BAME groups are projected to increase to 4.88 million by 2041, an increase of 1.57 million to .5 per cent increase<sup>18</sup>.
- 5.3.4 The White population is projected to increase from 4.91 million in 2011 to 5.48 million in 2041, an increase of 0.57 million (11.5 per cent) over the period<sup>19</sup>.
- 5.3.5 There are clear spatial trends when looking at London's ethnic groups and these have been changing over time. In 2011, London's White population was most highly concentrated in outer London; its Black population in east London; and its Asian population is west and north-east London<sup>20</sup>.

<sup>12</sup> ONS Census, GLA 2015 trend-based population projections (long-term migration scenario)

<sup>13</sup> Public Health Outcomes Framework 2012-14 <http://www.phoutcomes.info/public-health-outcomes-framework#page/0/gid/1000049/pat/6/par/E12000007/ati/102/are/E09000002>

<sup>14</sup> ONS Self-Reported well-being statistics

<sup>15</sup> ONS APS, <https://data.london.gov.uk/dataset/internet-use-borough-and-population-sub-groups>

<sup>16</sup> ONS Census 2011

<sup>17</sup> ONS Census 2011 incl update CIS 2012-04 <http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/internationalmigrantsinenglandand-wales/2012-12-11>

<sup>18</sup> GLA Intelligence, 2014 ethnic group projections

<sup>19</sup> Ibid

<sup>20</sup> GLA Economics (2016), Economic Evidence Base, Chapter 8

- 5.3.6 By 2036, 12 London boroughs are projected to have BAME majority populations, three in Inner London (Newham, Tower Hamlets, and Lewisham) and nine in Outer London (Brent, Harrow, Redbridge, Ealing, Hounslow, Barking and Dagenham, Croydon, Waltham Forest, and Hillingdon)<sup>21</sup>.
- 5.3.7 More than one in five Londoners used a language other than English as their main language at home. Polish, Bengali and Gujarati are the most widely spoken, each used at home by more than 100,000 Londoners<sup>22</sup>. Of London's total population 4 per cent at the time of the 2011 census could not speak English well or at all, significantly impacting their ability to fully participate in life in the city.
- 5.3.8 Nationally, 42 per cent of non-English speakers live in the capital.
- 5.3.9 In 2014, it is estimated that almost half (49 per cent) of Londoners define themselves as Christians (4.1 million), around 14 per cent as Muslims (1.2 million), 5 per cent as Hindu (440,000), 1.8 per cent Jewish (150,000), 1.2 per cent Sikh (101,000) and 1 per cent Buddhist (86,000)<sup>23</sup>.
- 5.3.10 A high proportion of London's population is made up of individuals and families who moved here from another country. 3.1 million Londoners were born outside the UK (37 per cent of the total population), with just under half arriving in the UK in the last 15 years. This compares to only 13 per cent living outside their country of birth in the rest of the UK<sup>24</sup>. In 2013, 58 per cent of live births in London were to a mother born outside the UK<sup>25</sup>.
- 5.3.11 Globally, London is the city with the second largest foreign-born population behind New York City in terms of absolute numbers. In terms of the share of foreign-born population, London is in line with other big cities such as Hong Kong, Sydney, and Singapore. As with age, this diversity of population is considered to contribute to London's economic strength.
- 5.3.12 Traditionally, migration to the UK came from relatively few countries globally and led to the establishment of long-standing settled communities. Over the past decade, migration flows have changed with new migrants coming from a broader range of countries with a diversity of faiths, languages and immigration statuses, and settling in different areas of London compared to the more recognised settlement patterns of older migrant communities.
- 5.3.13 Official statistics may not fully capture all those living in the capital. Hidden within London's thriving economy are extremely vulnerable groups such as undocumented migrants including refused asylum seekers, those overstaying their visas, and those in forced labour. In 2007, LSE research<sup>26</sup> estimated that there were between 400,000 and 700,000 undocumented migrants in London. At any given time, there are also short-term migrants, overnight visitors and owners of second homes in the capital.

<sup>21</sup> Mayor of London, The London Plan 2016

<sup>22</sup> ONS Census 2011 incl update CIS 2012-04 <http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/internationalmigrantsinenglandand-wales/2012-12-11>

<sup>23</sup> GLA Economics (2016) Economic Evidence Base

<sup>24</sup> ONS Annual Population Survey, 2014

<sup>25</sup> ONS, Births by parents' country of birth, 2014, at: <https://data.london.gov.uk/dataset/births-by-parents--country-of-birth--2014>

<sup>26</sup> London School of Economics (2009), 'Economic impact on the London and UK economy of an earned regularisation of irregular migrants to the UK', report for GLA Economics

5.3.14 The EHRC's (2016) research on fairness in England highlights the stigma and discrimination many groups face on the basis of their race and religion across England<sup>27</sup>. This is particularly true for Muslims, Sikh and Gypsy Traveller and Roma communities across the country and impacts their ability to fully participate and feel included. The research found that some groups in England were being 'left further behind' compared to others because they 'face particular barriers in accessing important public services and are locked out of opportunities'<sup>28</sup>. These groups make up a relative small part of the London's population yet face high levels of social isolation - they include travellers, asylum seekers and refugees, street homeless and disabled groups.

5.3.15 London's diversity does not only stem from its large ethnic mix; there are a range of other key characteristics that make London's population so diverse and its needs so varied.

**Deprivation**

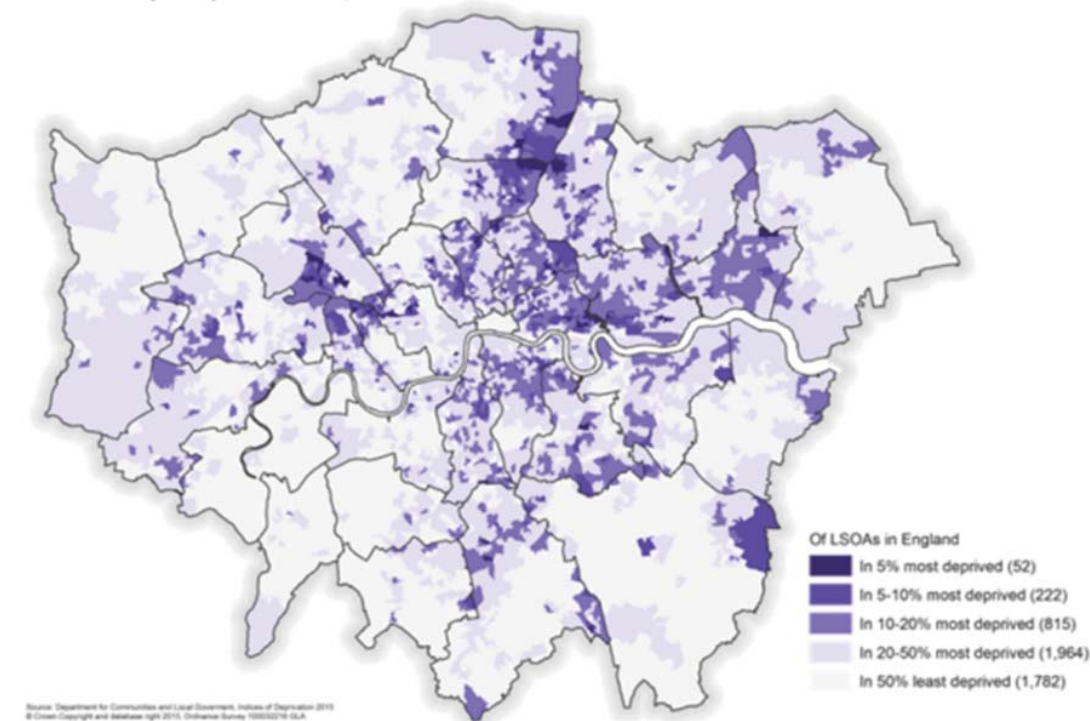
5.3.16 Based on the UK Government's qualitative index of multiple deprivation (IMD), many places in London are among the most deprived in the country. Areas within Hackney, Islington and Westminster are within two per cent of the most deprived areas in England. Parts of Haringey, Tower Hamlets, Croydon, Brent, Newham, Kensington & Chelsea, Barking & Dagenham, Enfield, Croydon, Lewisham, Waltham Forest, Lambeth and Ealing also fall within the most deprived five per cent of the country. As figure 5.7 shows, these areas are often in concentrations and follow particularly corridors.

5.3.17 A lack of income, employment and earnings is often associated with a wider range of other socio-economic issues: poor health, schooling, housing and crime. Whilst London has improved on this measure to become less deprived relative to the rest of the country between 2010 and 2015, it still contains persistently high levels of poverty in certain areas.

5.3.18 The City of London and Richmond are the only boroughs within London with no areas in the most deprived 20 per cent of England.

<sup>27</sup> Equality and Human Rights Commission 2016, 'Is England Fair: The State of Equality and Human Rights 2016',  
<sup>28</sup> Ibid

**Figure 5.7: Index of Multiple Deprivation for London, 2015**



*Department for Communities and Local Government, 2015*

5.3.19 After accounting for housing costs, 2.2 million Londoners live in relative poverty (below 60 per cent of the national median), equivalent to 27 per cent of the population. This compares to 20 per cent in the rest of England, with a third of inner London residents living in poverty. It includes 1.3m adults of working age, 700,000 children and 200,000 pensioners<sup>29</sup>.

5.3.20 Housing is a significant factor in driving these high rates of poverty in London, with poverty rates almost doubling after housing costs are considered. National evidence shows that getting a job is one of the best ways of moving out of poverty yet in London 21 per cent of working families live in poverty. However employment is not in itself sufficient to escape poverty. In contrast to a decade ago, the majority (c.60 per cent) of children and adults in poverty in London now live in a family where someone is in work<sup>30</sup>.

5.3.21 Different groups are more likely to experience poverty than others; households headed by minority ethnic individuals, households headed by young people and disabled people, refugee and asylum seekers, travellers and gypsy groups, and workless households. Children growing up in these households are at greater risk of experiencing poverty<sup>31</sup>.

5.3.22 37 per cent of children in London live in poverty with the highest rates (47 per cent) in Inner London, which is 20 percentage points higher than in the rest of England, although the gaps

<sup>29</sup> GLA Economics (2016), Economic Evidence Base  
<sup>30</sup> London's Poverty Profile [http://www.londonpovertyprofile.org.uk/2015\\_LPP\\_Document\\_01.7-web-per cent255b2per cent255d.pdf](http://www.londonpovertyprofile.org.uk/2015_LPP_Document_01.7-web-per cent255b2per cent255d.pdf)  
<sup>31</sup> Equality and Human Rights Commission 2016, 'Is England Fair: The State of Equality and Human Rights 2016',

have been reducing.<sup>32</sup> While fewer children in outer London were living without the essentials, more than 1 in 5 children in inner London could not afford items widely viewed as essentials. This includes items such as being able to afford birthday or other celebrations, a warm winter coat, and having a week-long holiday each year. Within London there are significant borough disparities between child poverty levels with Tower Hamlets and Newham having child poverty rates of 49 per cent and 41 per cent respectively while others like Richmond upon Thames (15 per cent) and Sutton (20 per cent) are much lower. Particular factors that influence child poverty include growing up in lone parent households, low income households; low parental qualifications; family instability; having a large family (family size) and parental ill health and disability. Another significant contributing factor that is often cited is the high costs of childcare in London<sup>33</sup>.

- 5.3.23 London has a smaller proportion of their total population over 65s than the rest of England, but at 18 per cent it has a higher rate of those in living poverty compared to 12 per cent in the rest of the country. This is equivalent to 200,000 Londoners, or 1 in 6 Londoners in this age group. Material deprivation affects more than a quarter of all pensioners in inner London. This is more than twice the rate in any other part of the UK with more than one in four unable to have or take part in the social norms for that population group (such as having a damp-free home, access to a telephone when needed, having their hair done or cut regularly, etc.)<sup>34</sup>.
- 5.3.24 Poverty and deprivation are important predictors of loneliness and poorer old people tend to be disadvantaged in multiple ways i.e. having lower levels of mobility, less access to technology and leisure activity<sup>35</sup>. Londoners experience more social isolation than people in other regions of the UK. Isolation and loneliness is not only found among older people, though it tends to be concentrated among this group.
- 5.3.25 The Runnymede Trust also highlights that deprivation and poverty act as major barriers to (social) integration. EHRC found BAME people were more likely to live in poverty than White people and children in BAME households were more likely to live in overcrowded accommodation than children in White households<sup>36</sup>.
- 5.3.26 Different groups are also likely to face differing challenges relating to financial exclusion and will have different support needs around financial resilience. There are strong links between financial exclusion and vulnerable groups or those on low income<sup>37</sup>. Problem debt is a significant and growing challenge in London, with the potential to affect all Londoners in different ways, regardless of where they live or how much they earn<sup>38</sup>.

<sup>32</sup> Family Resources Survey, DWP 1994/5-2013/14 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/437246/households-below-average-income-1994-95-to-2013-14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/437246/households-below-average-income-1994-95-to-2013-14.pdf)

<sup>33</sup> GLA Economics (2016), Economic Evidence Base

<sup>34</sup> DWP Family Resources Survey

<sup>35</sup> Friends of the Elderly - Future Foundation. The Future of Loneliness: Facing the challenge of loneliness for older people in the UK, 2014 to 2030

<sup>36</sup> Equality and Human Rights Commission 2016, 'Is England Fair: The State of Equality and Human Rights 2016'

<sup>37</sup> Toynbee Hall, 'Financial Inclusion and financial capability: what's in a name?' [http://www.toynbeehall.org.uk/data/files/Services/Financial\\_Inclusion/Financial\\_Inclusion\\_and\\_Capability\\_-\\_f](http://www.toynbeehall.org.uk/data/files/Services/Financial_Inclusion/Financial_Inclusion_and_Capability_-_f)

<sup>38</sup> Step Change, 'London in the Red - A briefing on problem debt in London', [https://www.stepchange.org/Portals/0/documents/Reports/London\\_in\\_the\\_Red\\_final\\_report.pdf](https://www.stepchange.org/Portals/0/documents/Reports/London_in_the_Red_final_report.pdf)

## Population Churn

- 5.3.27 There is a mixture of people coming into, leaving and moving around London for all sorts of reasons: natural change through births and deaths; movements of people within an area, into or out of the area from other parts of the country or overseas on both a short-term or long-term basis all contribute to 'population churn'. This can impact on people's sense of belonging to an area and community cohesion. In 2014, roughly 50 per cent of the 400,000 people moving to London were from abroad with the remaining 50 per cent moving from other regions within the UK<sup>39</sup>. Havering, Barking & Dagenham, Bexley and Bromley have experienced the highest proportion of London's internal movements, which have seen more people leave inner London boroughs than elsewhere across the capital, being absorbed by outer eastern and some southern boroughs<sup>40</sup>.
- 5.3.28 Social integration and community cohesion can have a significant effect on people's well-being and mental health. The Annual London Survey, based on interviews with 3,861 adult Londoners, found that around half of the respondents agreed that there are good relations between older and younger people, and between ethnic and religious communities in their local area<sup>41</sup>. The DCLG community life survey<sup>42</sup> found that 89 per cent of correspondents believed that their local area is a place where 'people from different backgrounds get along well together' this was slightly higher than the England average of 86 per cent. However the Annual London Survey also showed that Londoners also reported having less trust in people in their neighbourhood than the rest of the country (31 per cent versus 44 per cent)<sup>43</sup>.


<sup>39</sup> ONS internal migration estimates; and ONS mid-year components of change, year to mid-2014

<sup>40</sup> ONS internal migration estimates, 2014 at: <https://data.london.gov.uk/dataset/internal-migration-by-local-authorities>

<sup>41</sup> GLA Intelligence Unit, Annual London Survey 2015, GLA

<sup>42</sup> DCLG (2014) Community Life Survey

<sup>43</sup> GLA Intelligence Unit, Annual London Survey 2015, GLA

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Increasing aging and diverse population</li> <li>• Multiple Deprivation</li> <li>• High levels of poverty in some parts of London, with rates of child poverty continuing to exceed national levels</li> <li>• Discrimination</li> <li>• Isolation</li> <li>• Population churn and impact on community cohesion</li> <li>• Gentrification</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Development should meet the highest standards of inclusive design, to ensure it is suitable for the diversity of London’s population</li> <li>• Design of the built environment to encourage social cohesion and reduce isolation – inclusive neighbourhoods</li> <li>• Implications of an ageing and diverse population for public service delivery, urban design and housing provision.</li> <li>• Provision of accessible open space to encourage recreation and high quality public realm to encourage active travel.</li> <li>• Provision of a more accessible public transport system.</li> <li>• Link with other strategies to address wider determinants of deprivation, access to jobs, good quality housing and choice, provision open space, access to amenities and services</li> </ul>
<b>Implications of the plans and programmes review</b>	Reducing inequalities and the promotion of inclusion for those groups with protected characteristics to promote social integration and cohesion.
	
<b>Suggested IIA Objectives</b>	<ul style="list-style-type: none"> <li>• To ensure London has socially integrated communities which are strong, resilient and free of prejudice</li> <li>• To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population</li> <li>• To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness</li> </ul>

## 5.4 Health and Health Inequalities

The health of the population in terms of general health, lifestyle, life expectancies and other health determinants

5.4.1 Health can be influenced by a range of factors, and the quality and accessibility of the health care system is generally recognised to account for only a minority of the variation in overall health. Wider factors such as socio-economic status, the environments in which people live and the influence of these social and environmental factors on people’s behaviour have a profound impact on people’s physical and mental health.

### Londoners are living with complex health needs for longer periods.

5.4.2 Life expectancy at birth in London is now 80.3 years for men and 84.2 years for women<sup>44</sup>, which is slightly higher than for England as a whole, and trends in premature mortality for the leading causes of death – cancer, cardiovascular and respiratory diseases – are all going down. However, increases in the amount of time that people can expect to live without suffering from ill health (known as healthy life expectancy) are not keeping pace with increases in overall life expectancy, and a significant proportion of life is spent in ill-health. Healthy life expectancy in London is only 64 years for men and 64.1 years for women<sup>45</sup>.

5.4.3 An ageing population and improvements in healthcare also lead to an increasing burden from long-term conditions. Older people are more likely to have a long-term condition, or multiple long term conditions resulting in complex needs, and population projections suggest that this trend is increasing. As well as the obvious impact demand for healthcare services, long periods spent in ill-health can also have important implications for the way people live, affecting demand for different types of housing, infrastructure which is accessible to people with a range of health needs and implications for people’s ability to work.

### Access to Health Services

5.4.4 There are significant differences in the number of GPs per 1,000 population between London boroughs, with Islington having 0.69 GP’s per 1000 compared to Bexley which had 0.40 GP’s per 1,000 in 2015 – these differences could have significant implications on GP appointment waiting times. 19 boroughs have less than the England average number of GPs per patients at 0.57 GP’s per 1,000 population, with the fewest in Bexley, Barking & Dagenham and Redbridge. Bexley has the lowest number of GPs per patient in England. The highest numbers of GP’s per 1,000 population are in the boroughs of Islington, Tower Hamlets and Wandsworth<sup>46</sup>.

### Londoners are not consistently enabled to lead healthy lifestyles

5.4.5 Lifestyle factors play an important part in determining people’s long and short-term health. The four major lifestyle risks of poor diet, low levels of physical activity, smoking and excessive drinking can each independently have a major impact on health, but these lifestyle factors

<sup>44</sup> ONS Life Expectancy at Birth

<sup>45</sup> Public Health Outcomes Framework, Healthy Life Expectancy at Birth (2012-14) <http://www.phoutcomes.info/>

<sup>46</sup> Health & Social Care Information Centre (HSCIC) (2014) [www.hscic.gov.uk/catalogue/17387](http://www.hscic.gov.uk/catalogue/17387)

are also known to cluster in particular populations over time, with compounding effects for health<sup>47</sup>.

- 5.4.6 57.8 per cent of adults in London are physically active<sup>48</sup>, which is slightly better than for England. However, the relatively high proportion of people who meet physical activity recommendations masks a substantial minority of the population who do almost no physical activity at all. As much as 28.1 per cent of London's population is considered inactive, meaning they do less than 30 minutes of physical activity per week, with particularly high rates of physical inactivity in Barking and Dagenham - 43.7 per cent, Newham - 39.8 per cent and Brent - 34.3 per cent<sup>49</sup>. Certain groups, such as those who own a car and older people, are less likely to walk or cycle making them less likely to be getting the activity they need.
- 5.4.7 The London Health Commission finds that only 55 per cent of children in London are physically active. Inactivity rates are much lower in London men than women – 23 per cent of London men are inactive compared to 30.9 per cent of London women. These rates are slightly lower than the England average. 28.3 per cent of BAME Londoners are inactive, similar to the national rate for BAME groups. 49.5 per cent of London disabled people are inactive compared to 50 per cent of the England average. In London inactivity increases with age with the highest levels of inactivity found among the 60 and over group at 49 per cent in London compared to 45.3 per cent in England. Inactivity on average is higher in London than England for all age groups except 26-34. The majority of young people aged 5-15 years old (84 per cent of girls and 79 per cent of boys) are not meeting the minimum recommended guidelines for physical activity<sup>50</sup>.
- 5.4.8 Childhood obesity is a particular problem in London and is related to a poor diet, low physical activity and an obesogenic environment. The proportion of children aged 4-5 classified as overweight or obese in London is 22.2 per cent and is as high as 37.2 per cent for 10-11 year olds, significantly higher than for England as a whole. Excess weight in adults is 58.4 per cent in London as a whole<sup>51</sup>.
- 5.4.9 Whilst physical activity is an essential part of a healthy lifestyle, diet is proven to have more impact on people's weight. Public Health England data shows a strong association between deprivation and the density of fast food outlets, with more deprived areas having more fast food outlets per 100,000 residents. A large number of these outlets are also located near to schools. This is likely to have an impact on the food choices young people make and affect levels of obesity within this age group<sup>52</sup>.
- 5.4.10 It is important that the London Plan considers the role and design of the built environment and its integration with the natural environment to ensure that communities have the opportunities to access healthy lifestyle choices, however this will need to be conjunction with the Mayor other strategies which can more directly impact behavioural choices.

<sup>47</sup> King's Fund, Clustering of Unhealthy Behaviours Over Time 2012 <https://www.kingsfund.org.uk/publications/clustering-unhealthy-behaviours-over-time>

<sup>48</sup> Meaning that they meet the Chief Medical Officer's recommendation of doing at least 150 minutes per week of physical activity

<sup>49</sup> Public Health Outcomes Framework 2012-2014, percentage of physically inactive adults, 2015 <http://www.phoutcomes.info/>

<sup>50</sup> <http://activepeople.sportengland.org>

<sup>51</sup> Public Health Outcomes Framework 2012 - 2014 <http://www.phoutcomes.info/>

<sup>52</sup> [http://www.noo.org.uk/securefiles/160411\\_0954//FastFoodOutletsJan13\\_v2-2.pdf](http://www.noo.org.uk/securefiles/160411_0954//FastFoodOutletsJan13_v2-2.pdf)

### Social inequalities in the physical and mental health of Londoners

- 5.4.11 There are very substantial differences in life expectancy and healthy life expectancy between different boroughs and demographic groups, with people in the most deprived areas having the shortest life expectancy. Healthy life expectancy for men is 17.6 years shorter in Barking and Dagenham as in Richmond on Thames, and 13.7 years shorter for women in Tower Hamlets as in Richmond on Thames. Looking at smaller local areas (MSOAs), the gap in healthy life expectancy is as high as 26.9 years for men and 28 years for women between certain areas<sup>53</sup>.
- 5.4.12 Although there are large variations across boroughs, London has the lowest reported life satisfaction, worthwhileness and happiness and the highest anxiety of any UK region. London's average anxiety rating was 3.15, compared to England's average of 2.93 on an eleven point scale<sup>54</sup>. These differences may be explained by London's different age structure.
- 5.4.13 Whilst older people generally report higher life satisfaction and happiness than other age groups, this masks significant variations in experiences. There are 65,000 older Londoners (over 65 years old) that experience dementia. This figure is expected to almost double over the next 30 years. Mental health problems are common in all age groups, and the proportion of people with a recorded mental health problem is higher in London than in England as a whole<sup>55</sup>.
- 5.4.14 A London Assembly Health Committee report identified a wide range of factors beyond health that may contribute to an individual's predisposition to mental ill-health, including access to good housing, education and employment. These are particularly pertinent in areas of high deprivation<sup>56</sup>. The Cavendish report (2014) also finds Londoners are more likely than residents in other parts of UK to suffer mental health problems as a result of unemployment or debt<sup>57</sup>.
- 5.4.15 Whilst difficult to study, there is also a possible link between access to green space and increases in physical activity, with the consequent health impacts. There is stronger evidence that people with better access to the natural environment tend to be happier and less prone to mental illness: nature has positive effects on mood, concentration, self-discipline, and physiological stress. There is also good evidence for the contribution of the natural environment to social cohesion, particularly for well-maintained green spaces<sup>58</sup>.

### Air Quality

- 5.4.16 Whilst air quality in London is improving; in the last fifteen years the concentrations of all local air pollutants in London have decreased, London is failing to meet limits for NO<sub>2</sub> with specific concerns over particulate matter, which is damaging to health at any level. Children,

<sup>53</sup> Analysis conducted on behalf of the GLA by Public Health England, 2016

<sup>54</sup> <http://www.ons.gov.uk/ons/rel/wellbeing/measuring-national-well-being/personal-well-being-in-the-uk--2013-14/sb-personal-well-being-in-the-uk--2013-14.html#tab-5--Personal-well-being-in-the-English-regions->

<sup>55</sup> <http://www.ons.gov.uk/ons/rel/wellbeing/measuring-national-well-being/personal-well-being-in-the-uk--2013-14/sb-personal-well-being-in-the-uk--2013-14.html#tab-5--Personal-well-being-in-the-English-regions->

<sup>56</sup> Mayor of London (2014), LONDON MENTAL HEALTH: The invisible costs of mental ill health, GLA


<sup>57</sup> <http://tavistockandportman.uk/sites/default/files/files/London%20Mental%20Health%20Fact%20Book%20Cavendish%20Square%20Group%20FINAL.pdf>

<sup>58</sup> Mayor of London (2015) Green Infrastructure Task Force Report, GLA

older people, and people already suffering from lung or heart issues are particularly vulnerable. Nearly 25 per cent of all school children in London are reported to be exposed to levels of air pollution that exceed legal limits.

5.4.17 The London Health Commission states that 7 per cent of all adult deaths in London are attributable to air pollution. Mortality is not the only air pollution related health effects, in 2010 - London air pollution was associated with over 3,000 hospital admissions, an increased sensitivity to allergens, pre-natal exposure linked to low birth weight and increased risks of chronic disease later in life are also associated with issues of air quality.

5.4.18 Other wider determinants of health and exposure to environment risks such as the urban heat island effect and flooding and their related impacts on the population's health are discussed in sections 5.15 and 5.18

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Increasing health inequalities across the population</li> <li>• Londoners are living with complex health needs for longer period</li> <li>• Increasing and changing pressure on the health services and service provision</li> <li>• Differentials in life expectancy and healthy life expectancy across London</li> <li>• Widening social inequalities</li> <li>• Low levels of physical activity and increasing obesity levels across the population</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Development should be meet the needs of wide range of peoples</li> <li>• Increased co-ordination of between the provision of different service delivery to meet requirements of an ageing and more diverse population</li> <li>• Design of the built environment to promote health lifestyle choices</li> <li>• Link with other strategies to address wider determinants of health, access to jobs, good quality housing and choice, provision open space, access to amenities and services</li> </ul>
<b>Implications of the plans and programmes review</b>	A need to improve the overall health of London's population and reduce inequalities in the health of the population.
	
<b>Suggested IIA Objectives</b>	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities.

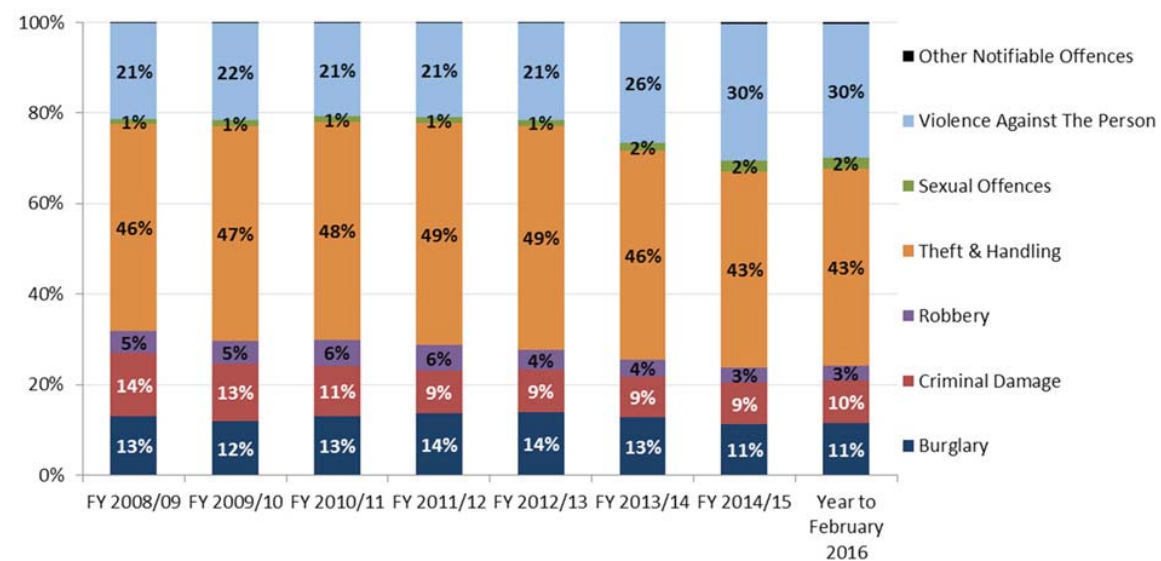
## 5.5 Crime, Safety and Security

Actual crime, perceived risk of crime, anti-social behaviour (ASB) and threats to security / major incidents.

- 5.5.1 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK.
- 5.5.2 Heightened risks of threats to security can impact London's economic competitiveness and tourism.
- 5.5.3 The Counter-Terrorism and Security Act 2015 permits the Home Secretary to issue guidance for the purpose of preventing people from being drawn into terrorism. CONTEST is a national strategy and based around four main areas of work: Pursue, Prevent, Protect and Prepare. There is also a new counter-extremism strategy which sits alongside the government's wider counter-terrorism activity. Collectively, these strategies set out how the government, with the boroughs and other statutory partners in London, work together to reduce the threat from terrorist or extremist activity.
- 5.5.4 In terms of other forms of crime and perceptions of safety, although most Londoners feel safe in their communities, in 2015 36 per cent of Londoners were 'worried' or 'very worried' about crime in their local area.
- 5.5.5 Recorded crime statistics are published on the Metropolitan Police Service website each month, and are broken down into 32 different crime types: including violence with injury, robbery, theft from person, burglary, theft of motor vehicle, theft from motor vehicle and criminal damage.



Figure 5.8 Recorded Crime Statistics 2008 - 2016



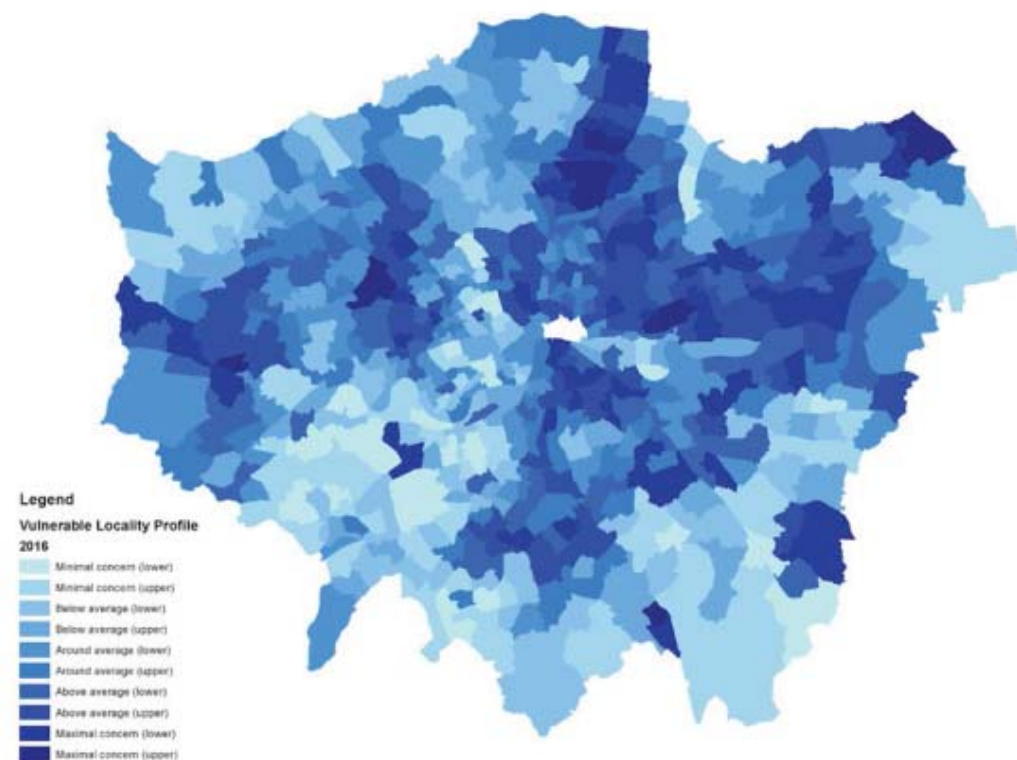
MOPAC

- 5.5.6 In general, levels of recorded crime in London have fallen consistently since 2008. Notably, the volume of victim based crimes has decreased over time, with over 53,000 fewer offences in the most recent year compared to 2008/09.
- 5.5.7 Reports of hate crimes however have increased over the last few years with the largest percentage rises in disability and faith hate crimes in London. Racist and religious crime represents the bulk of recorded hate crime across the London in the year to December 2015 – representing 88 per cent of all hate crimes. Victims of hate crime are most frequently recorded as male (61 per cent male and 39 per cent female), and tend to be adults (18-34 years - 44 per cent, 35-60 years - 41 per cent). Older people over 60 years old (8 per cent) and children under 18 (7 per cent) account for a lower proportion of victims of reported hate crimes<sup>59</sup>.
- 5.5.8 Regardless of the offence, in 2014, 3 per cent (16,404) of all victims were flagged as having a disability, with violence against the person having the highest amount of victims with a disability (39 per cent).
- 5.5.9 Anti-social behaviour incidents have fallen since 2007/08 from a rate of 51 incidents per 1000 population to 32 per 1000 population in 2014/15. This figure is currently lower than the England and Wales rate of 34 per 1000 population but fluctuates from year to year.
- 5.5.10 Using London-specific data covering issues of deprivation, population, crime, and educational attainment, the Vulnerable Locality Profile (VLP) maps the relative safety of locations in London to identify wards in London most at risk from issues of community cohesion. This identifies a ‘central cross’ of vulnerability in London and classifies a top 10 per cent of wards as of being of most concern. In this group, several wards are located in Haringey (7), Enfield (7), Newham (6), Barking and Dagenham (5), Southwark (5), Lewisham (4) and Brent (4), with Northumberland Park in Haringey assessed to be the ‘most vulnerable’ ward in London. In contrast, over 70 per cent of the least vulnerable wards are located in South London, in the boroughs of Richmond, Bromley, Wandsworth, Sutton, Merton, Bexley, Kensington and Kingston (see figure 5.9).

<sup>59</sup> Mayor’s Office for Police and Crime 2016

5.5.11 Within the most vulnerable areas, there are higher rates of crime, particularly violence against the person, and there are also much higher rates (compared to the group of least vulnerable wards) of unemployment, deprivation, residents of BAME ethnicity, and deliberate fires<sup>60</sup>. Understanding the interrelationship between these factors is important in being able to target action effectively.

Figure 5.9: Vulnerability locality profile at ward level, 2016



GLA London Landscapes, derived from data provided by GLA population projections, the Metropolitan Police Service and Department for Education via ONS Neighbourhood Statistics.

- 5.5.12 Fear of crime can be a barrier to walking or using public transport. A recent TfL survey (2014) indicates that 31 per cent of Londoners are put off using public transport because of concerns about anti-social behaviour<sup>61</sup>. BAME groups and women are most likely to say that their frequency of travel is affected ‘a lot’ because of concerns over anti-social behaviour<sup>62</sup>. Fear of anti-social behaviour can be stressful and can limit people’s access to activities and contribute to social isolation.
- 5.5.13 The design of the build environment can help to minimise risk of criminal behaviour through passive surveillance. Sometimes there is a balance between designing a place to make it feel safe and secure and allowing places to be permeable and attractive which can aid walking and


<sup>60</sup> Based on simple comparisons between Ward level data via the GLA ward profiles and atlas (2014 boundaries), available at: <http://data.london.gov.uk/dataset/ward-profiles-and-atlas>

<sup>61</sup> Transport for London (2015), Safety and Security Survey, Future Thinking

<sup>62</sup> Mayor of London (March 2016), Crime on public transport. GLA.

movement. Ensuring that places are appropriately lit can also help to minimise risk of crime and add to perceptions of safety.

- 5.5.14 Safety concerns are a barrier to active travel and contribute to inactivity which, in turn, has impacts on health and wellbeing.
- 5.5.15 The evening and night time economy is a key driver of the economic and cultural regeneration of town centres. However whilst an increase in night-time activities may provide greater ‘passive-surveillance’, it can also lead to an increase risk in crime, anti-social behaviour and community safety problems which, without appropriate management and mitigation, can impacts on the quality of life of local residents, workers and customers. Perceptions of safety may also disproportionately impact certain vulnerable groups.
- 5.5.16 As well as the social effects of crime and perceptions of safety, there are costs to business such as impacts of crime/fraud, cost of insurance and additional security measures which can affects London’s global reputation.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Increased threat of major incidents and unplanned events</li> <li>• Perceptions of safety</li> <li>• Fear of crime creating barrier to activities leading to increased social isolation</li> <li>• Vulnerability of different groups of people at greater risk of crime</li> <li>• More vibrant night-time economy leading to increased risk of crime</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Designing out crime should be integral to development proposals and considered early in the design process</li> <li>• Use of lightening and passive surveillance to help improve perceptions of safety</li> <li>• Need to balance aspects of permeability and legibility with concerns of safety and security</li> <li>• Promote the use of private spaces for the public</li> </ul>
<b>Implications of the plans and programmes review</b>	The design of the built environment can significantly impact on people’s fear of and actual crime.
	
<b>Suggested IIA Objectives</b>	To contribute to safety and security and the perceptions of safety.

## 5.6 Housing

### A person’s home / shelter

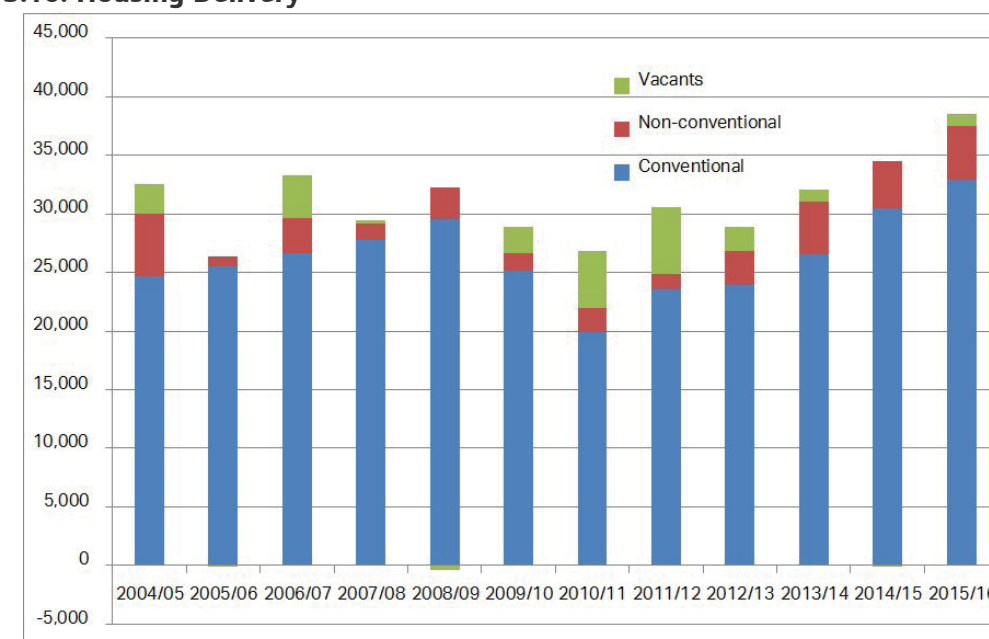
#### Housing need

- 5.6.1 The 2017 London Strategic Housing Market Assessment (SHMA) estimates that London will need around 66,000 new homes every year between 2019 and 2041, of which: 35 per cent should be market homes, 18 per cent intermediate, and 47 per cent low cost rent.

#### Housing supply

- 5.6.2 Over the last 10 years, London has delivered on average around 25,000 net conventional homes each year. This includes new build housing as well additional housing from conversions and change of use. This figure rises to around 27,500 housing units a year when other non-self contained housing units are included. It includes bedrooms in student halls of residence, hostels and large houses in multiple occupation. Where vacant homes returning to use are accounted for, the average overall net housing supply in London has been c29,500 units a year.

Figure 5.10: Housing Delivery



London Development Database

- 5.6.3 The most recent London Plan AMR<sup>63</sup> shows that overall housing provision in London during 2014/15 was 32,44064. This overall net figure includes:
  - 28,191 net conventional housing completions – 83 per cent of these completions were new

<sup>63</sup> Mayor of London, London Plan AMR 12, 2014/15

<sup>64</sup> This includes net conventional and non-self contained housing and the number of long-term vacant homes returning to use

build homes, 4 per cent were housing conversions and 13 per cent were change of use

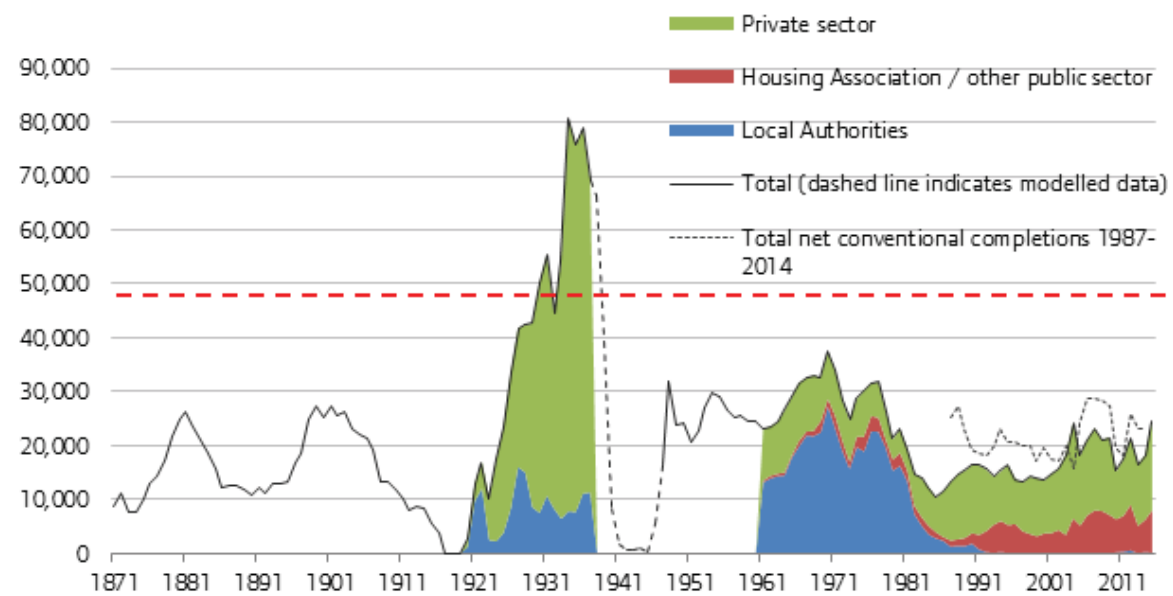
- 4,369 non-self-contained housing units were completed. 4,369 non-self-contained housing units were completed.
- the number of long term vacant properties rose by 120 overall.

5.6.4 New housing provision in London is heavily weighted towards smaller units. Across all tenures, 34 per cent of homes completed during 2014/15 had one bedroom, 42 per cent had two bedrooms and the remaining 24 per cent had three bedrooms or more<sup>65</sup>.

**Historic context – housing delivery**

5.6.5 Substantial increases in current rates of housing delivery are required to ensure London meets its housing need, with almost one million new homes needed between 2015 and 2035<sup>66</sup>. This level of housing output has not been achieved in London since the 1930s. From a historic context, the number of new homes built in London peaked in 1934 at 80,600 units. Even the post war council housing booms producing a peak of only 37,400 unit pa in 1970 and during this period the overall net housing provision was actually lower than during the past three decades. This is because of higher rates of demolitions during this period and also the impact of net housing provision from conversions and change of use. As Figure 5.11 shows, local authority housing pretty much stopped from the early 1990s.

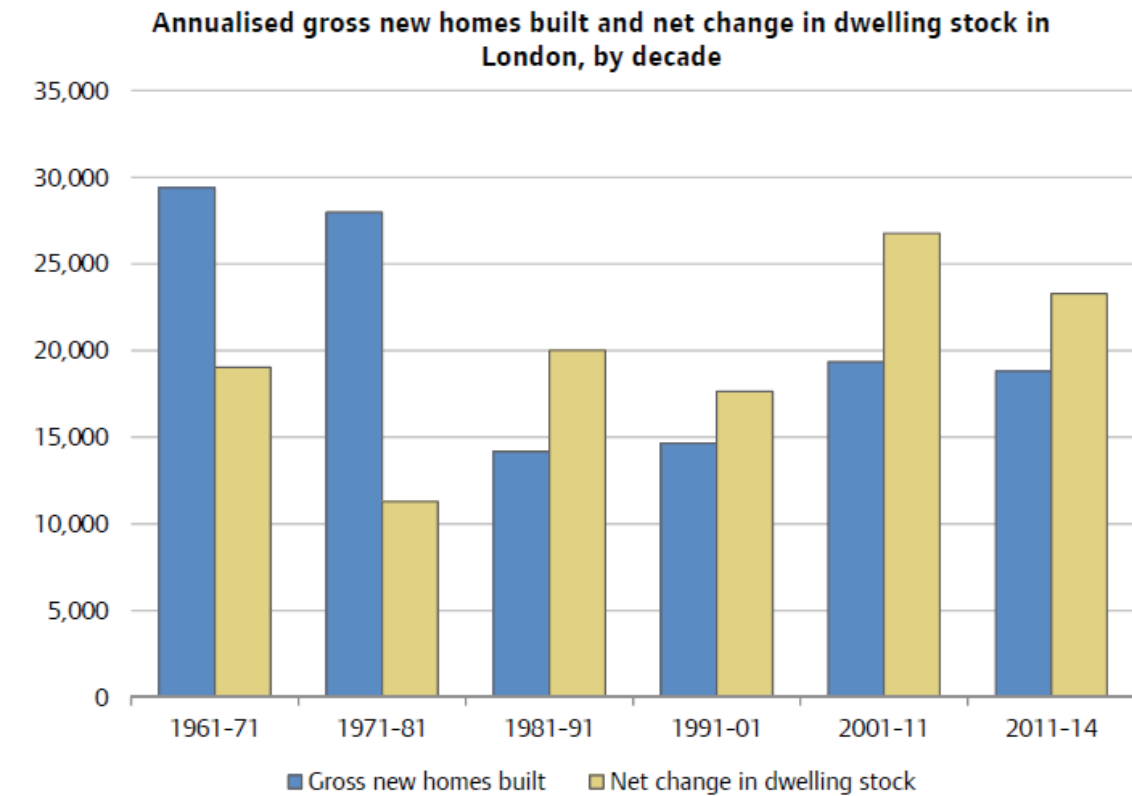
**Figure 5.11: Net housing delivery by type**



GLA and Department for Communities and Local Government<sup>67</sup>

<sup>65</sup> London Development Database  
<sup>66</sup> Mayor of London (2013) Strategic Housing Land Availability Assessment, GLA  
<sup>67</sup> Note – net conventional completions (1987-2013) includes net housing provision from conversions, change of uses and extensions (Source: London Development Database)

**Figure 5.12: Annualised Gross new homes built and change in dwelling stock**



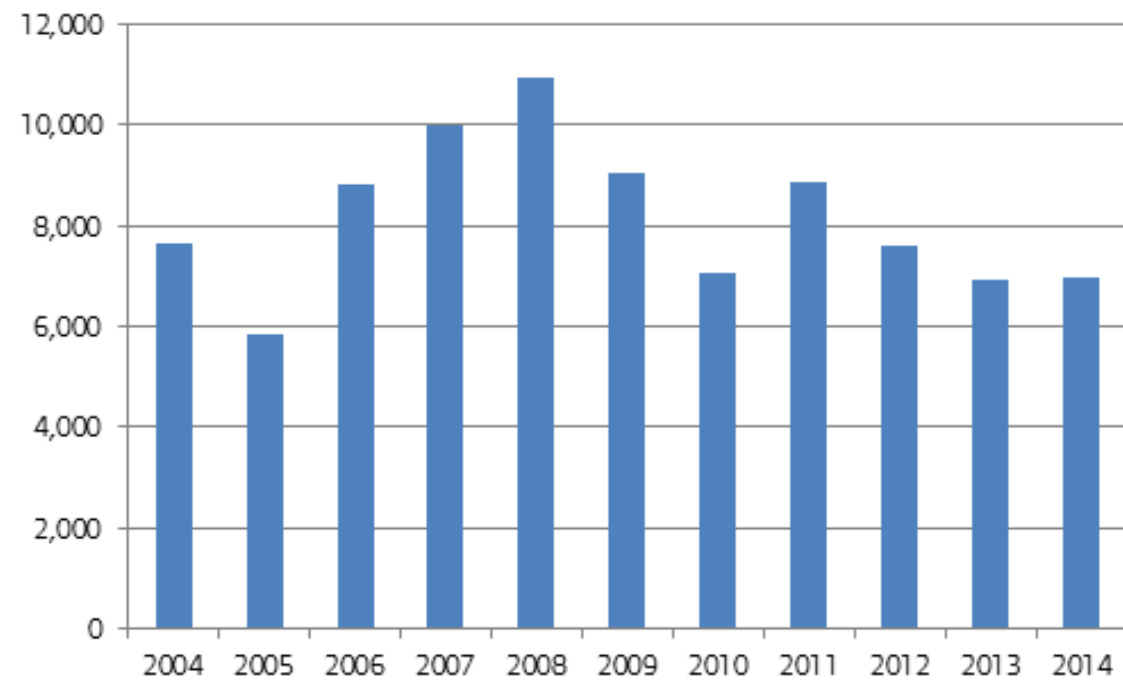
GLA Housing in London, 2014/5

**Affordable housing delivery**

5.6.6 Over the last three years, 28 per cent of overall net conventional housing planning permissions were affordable units equivalent to 21,529 homes – providing on average 7,176 net affordable homes a year<sup>68</sup>. This is significantly less than the current housing target in the London Plan, which seeks a minimum of 17,000 affordable homes a year. Social rented units make up 52 per cent of affordable completions over this period, intermediate housing 37 per cent and affordable rent nearly 11 per cent. Overall, 28 per cent of affordable housing completions in 2014/15 comprised homes with three or more bedrooms, with the remainder being 1 and 2 bedroom units. Average annual net affordable housing in London has been around 8,100 since 2004 and is shown on figure 5.13. In 2014/15, 87 per cent of approved units were for market sale or rent, leaving 13 per cent as affordable units, broken down as 7 per cent intermediate, 4 per cent affordable rent and 2 per cent social rented<sup>69</sup>.

<sup>68</sup> Mayor of London, London Plan Annual Monitoring Report 2014/15  
<sup>69</sup> Ibid

Figure 5.13: Net affordable housing delivery 2004/5 to 2014/15



London Development Database

5.6.7 Measured in gross terms (including acquisitions of existing private sector homes for use as affordable housing) 53,430 affordable homes were delivered during the four years 2011/12 to 2014/15, of which 23,200 were social rented housing, 17,490 intermediate housing and 12,270 were affordable rent. Nb this figure does not include demolitions.

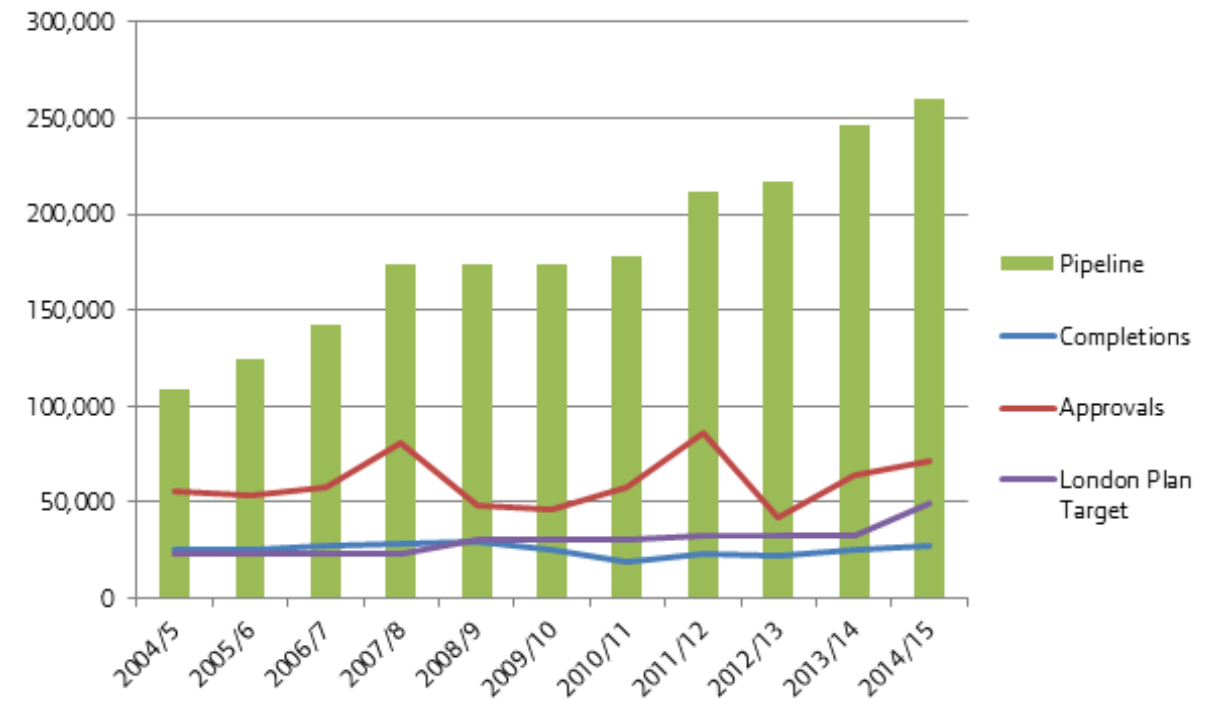
**London’s planning pipeline**

5.6.8 As of 31 March 2015, the net conventional housing pipeline consisted of 261,600 homes, of which 51 per cent are under construction. 78 per cent of the pipeline are 1 and 2 bed units and 22 per cent 3+ bedroom homes. This pipeline has more than doubled over the last 10 years, as shown in Figure 5.14, as around twice the number of units are approved each year as are completed. London boroughs consistently grant planning permission for over 50,000 conventional homes a year, with completions averaging 25,000 a year<sup>70</sup>. Indeed, over 74,000 homes were approved in London during 2014/15 up from 63,700 in 2013/14<sup>71</sup>.

5.6.9 However, half of London’s pipeline of approved units is concentrated in schemes of over 500 units in size which will take years, if not decades, to be completed due to phasing and infrastructure delivery constraints and timescales. Indeed, many approved schemes may not come forward. The pipeline is also concentrated in particular boroughs and in East London. Figure 5.15 shows the distribution of London’s pipeline in terms of size of schemes.

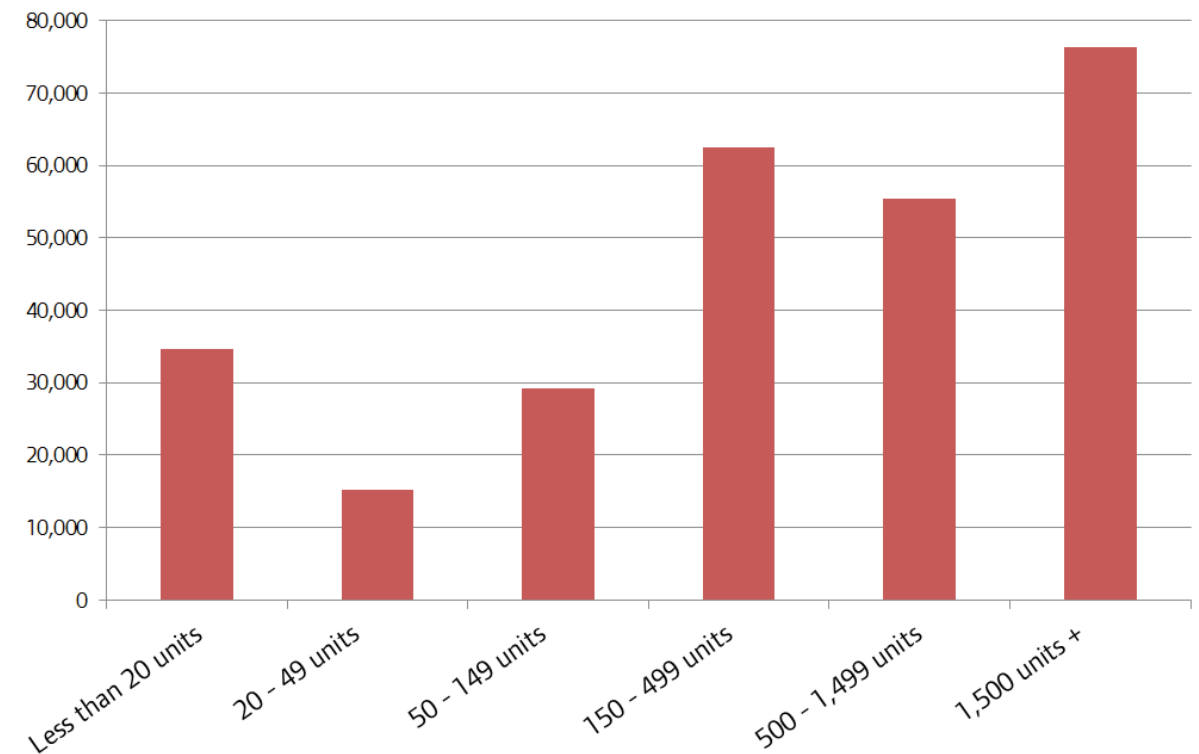
<sup>70</sup> London Development Database – net conventional homes  
<sup>71</sup> Mayor of London, London Plan Annual Monitoring Report 2014/15

Figure 5.14 London’s net conventional housing pipeline, 2004 to 2015



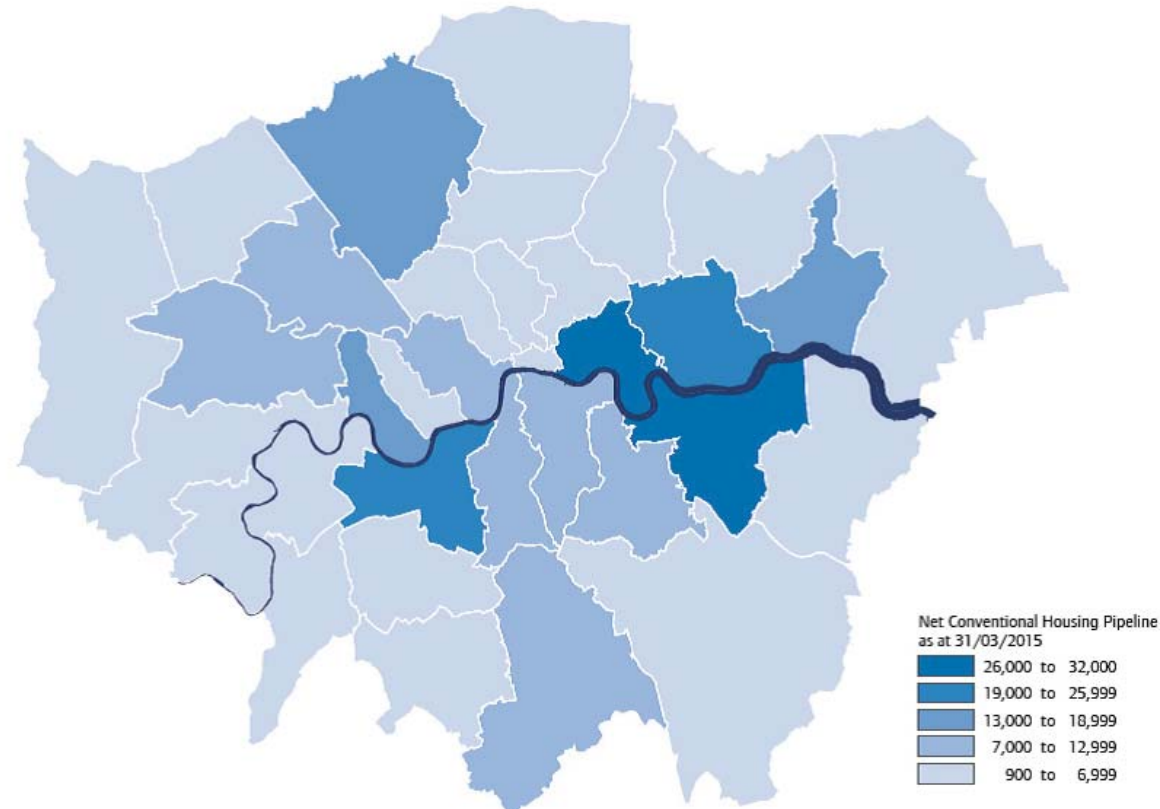
London Development Database

Figure 5.15: London’s housing pipeline by number of units in the scheme



London Development Database

**Figure 5.16: London’s net conventional housing pipeline by borough**



London Development Database

**Residential density, typology and stock**

- 5.6.10 The average density of new housing approvals in 2014/15 was 160 dwellings per hectare (dph), and the average density of completions was 124 dph. The 2011 Census shows that flats comprise just over half of London’s accommodation, compared to less than 20 per cent in the rest of the country<sup>72</sup> and the London Development Database (LDD) shows that they make up the large majority (7/8th) of new dwellings being built in London.
- 5.6.11 New homes in London have an average floor area of 80 square metres (m<sup>2</sup>), compared to an average across England as a whole of 92m<sup>2</sup>. The average size of homes in London depends on the age of the housing stock. Homes built before the war are typically larger on average (87m<sup>2</sup>), whilst those built during the post war period and 1980s and 1990s tend to be smaller compared to the current average<sup>73</sup>.

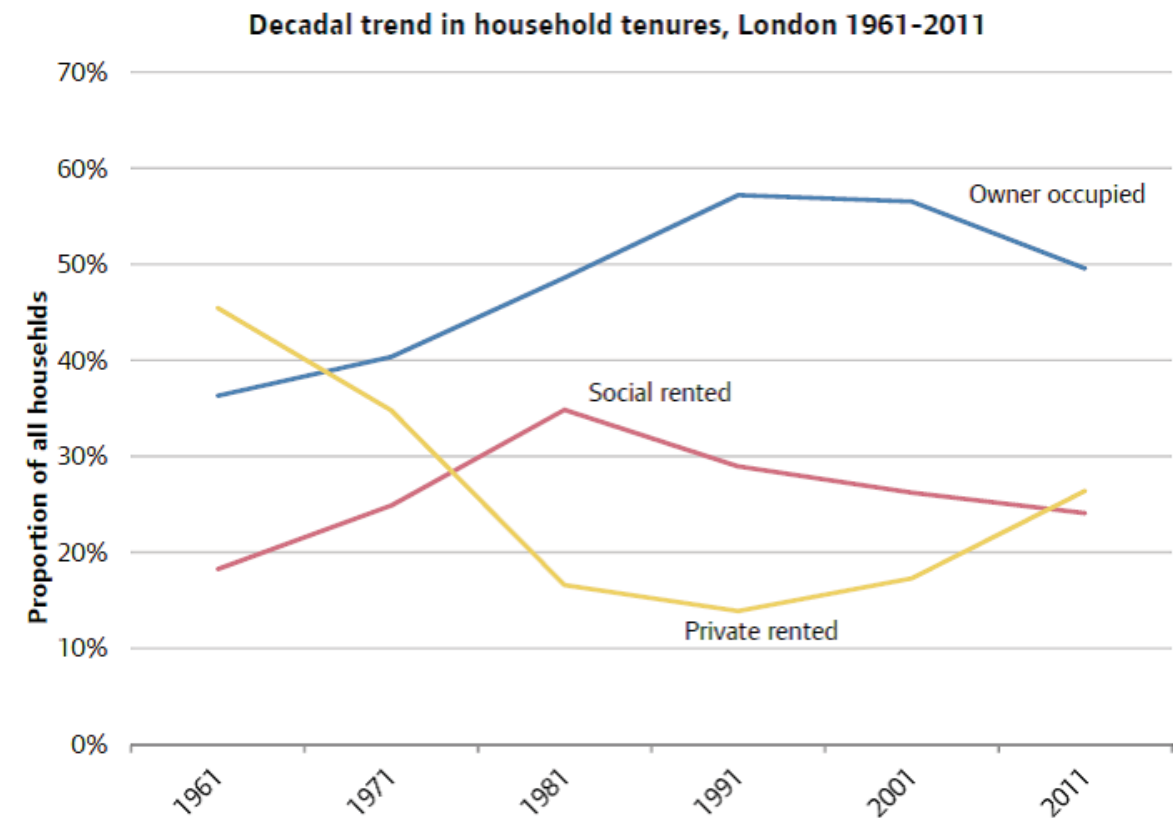
**Housing tenure trends**

- 5.6.12 The private rented sector was once the largest tenure in London but shrank from 46 per cent of households in 1961 to 14 per cent in 1991, before rapid growth brought it back up to 26 per cent in 2011, making it the second largest tenure. In contrast, social renting grew rapidly between the 1960s and 1980s, accommodating 35 per cent of households in 1981, before falling to 24 per cent in 2011<sup>74</sup>.

<sup>72</sup> Mayor of London, London Plan Annual Monitoring Report 2014/15  
<sup>73</sup> Mayor of London (2015), Housing in London, GLA  
<sup>74</sup> Ibid

- 5.6.13 The proportion of London households who own their own home (whether outright or with a mortgage) peaked in the early 1990s but then fell to just under half by the time of the 2011 Census, the first time owner occupiers have been in the minority since the early 1980s. In England as a whole, 64 per cent of households owned their home in 2011, with 18 per cent each in social and private rented accommodation<sup>75</sup>.
- 5.6.14 Homes in Multiple Occupation comprise 8 per cent of London’s private housing stock, a much higher rate than in other areas in the country. One in three private renting households in London has children, up from one in five a decade ago. The proportion of private renting households with children rose from 20 per cent in 2004 to 33 per cent in 2014<sup>76</sup>.

**Figure 5.17: Housing Tenure 1961 – 2011**



GLA Housing in London 2015

**Housing affordability**

- 5.6.15 In March 2015 average rents in the private sector have risen 29 per cent since 2005 and are increasing at a faster rate than average earnings, implying affordability is increasingly getting worse<sup>77</sup>. The median cost of renting a one or two bed flat is now £1,155 and £1,400 respectively. However, there is also huge variation in monthly market rents within London and, in the most expensive boroughs, between the top and bottom of the market. Across Inner

<sup>75</sup> Mayor of London (2015), Housing in London, GLA  
<sup>76</sup> Ibid  
<sup>77</sup> Ibid

London as a whole, the median monthly rent for a two bedroom home is £1,650, compared to £1,200 in outer London.

- 5.6.16 In 2014 median house prices were almost 10 times median earnings<sup>78</sup>, meaning that the aspiration of home-ownership is increasingly beyond the reach of many Londoners, unless households have access to significant deposits or are able to access and progress from shared ownership products.
- 5.6.17 Home ownership rates among younger Londoners have fallen sharply in recent decades. In 1990, 25 per cent of households in London were headed by someone aged 16-24 and 57 per cent by someone aged 25-34 owned their home, but by 2014 these figures had fallen to 6 per cent and 26 per cent respectively. Home ownership rates also fell for households headed by someone aged 35-44 (from 69 per cent to 47 per cent) and 45-54 (71 per cent to 56 per cent)<sup>79</sup>.
- 5.6.18 Nearly a quarter of young adults in London live with their parents, up from one in six in the late 1990s. Around 470,000 young adults (those aged 20 to 34) in London live with their parents, 24 per cent of all those in this age group. The proportion living with their parents has risen from 17 per cent in the late 1990s, with a particularly rapid rise seen in recent years<sup>80</sup>.
- 5.6.19 The average age a Londoner purchases their first home is 34 years old and an increasing number are only able to meet the value of large deposits needed thanks to parental assistance and/or inheritance. This may have long-term implications for social mobility and entrenched wealth inequality across generations.
- 5.6.20 The affordability challenges facing low and middle income groups, including key workers, has been a key economic concern for businesses in London, particularly in light of the potential impacts on labour market mobility, staff retention, consumer spending and the capital's overall attractiveness as a global city<sup>81</sup>. In November 2014 there were 269,000 Housing Benefit recipients in London's private rented sector, and 557,000 in social housing.

### Overcrowding

- 5.6.21 Around 8 per cent of households in London are in overcrowded accommodation, with higher rates of overcrowding in certain boroughs and within the private and social rented sector (around 13 per cent)<sup>82</sup>. Increases in overcrowding since the 1990s are driven by rising overcrowding rates in private and social rented housing, as the proportion of overcrowded homeowner households has held relatively steady at around 3 per cent over the period. The proportion of overcrowded private renting households has more than doubled since the 1990s. While inner London has always been more overcrowded than outer London, there is enormous variation in overcrowding rates across London at ward level and it has risen sharply in pockets of outer London.

<sup>78</sup> GLA Economics (2016), Economic Evidence Base

<sup>79</sup> Mayor of London (2015), Housing in London, GLA

<sup>80</sup> Ibid

<sup>81</sup> London Chamber of Commerce and Industry, Getting our house in order, 2014

<sup>82</sup> Mayor of London (2015), Housing in London, GLA

### Homelessness

- 5.6.22 In March 2015 there were 48,240 homeless households in temporary accommodation arranged by London boroughs, an increase of 11 per cent from 2014 and 35 per cent from its lowest point in mid-2010<sup>83</sup>. Most of these households (around 37,000) were being housed in accommodation leased from private sector landlords or other private sector accommodation, with the remaining households housed in hostels and refuges, bed and breakfast hotels and social housing. The average length of stay in temporary accommodation in London has remained steady in recent years. There were 7,580 people seen sleeping rough in London in 2014/15, an increase of 16 per cent or more than a thousand on the 2013/14 figure. 17,530 households were accepted as statutorily homeless in London in 2012/13, which accounts for 32 per cent of the national total<sup>84</sup>.

### Empty homes

- 5.6.23 According to council tax data there were 56,720 empty homes in London in 2014, equivalent to 1.7 per cent of the total dwelling stock. Both the number of empty homes in London and their share of the total housing stock are at their lowest levels since at least 1978 having fallen more or less continuously since a peak of 160,500 or 5.4 per cent in 1993. Since 2004 the overall number of long-term vacant homes in London (registered as vacant for longer than 6 months) has reduced by half and now accounts for only 0.6 per cent of the total housing stock - 20,800 homes. This is also a record low. London has a much lower vacancy rate in its private sector housing than other parts of the country, while vacancy rates for affordable housing are broadly similar<sup>85</sup>.

### Second homes

- 5.6.24 There are 48,390 homes in London recorded as second homes for council tax purposes, around 1.4 per cent of the total housing stock. Just over half of these are in four boroughs: 8,330 in Kensington and Chelsea; 6,080 in Westminster; 5,560 in Camden; and 5,000 in Tower Hamlets. Together, the remaining 29 boroughs have 23,420 recorded second homes<sup>86</sup>.

### Under-occupation

- 5.6.25 There are around 730,000 under-occupying households<sup>87</sup> in London, around 23 per cent of all households in the capital. Around 85 per cent of these are home owners, 8 per cent are private renters and another 8 per cent are social housing tenants. According to the 2011 census, 34 per cent of households in outer London are currently under-occupying their homes to the extent that they have a surplus of two or more rooms (based on the number of recorded household residents). This compares to just 19 per cent of households in inner London. In some outer London boroughs the rate is between 40 per cent and 50 per cent of all households<sup>88</sup>.

<sup>83</sup> Ibid

<sup>84</sup> Ibid

<sup>85</sup> Ibid

<sup>86</sup> Ibid

<sup>87</sup> Under-occupied households are those with two or more bedrooms more than they require according to the bedroom standard (though this does not necessarily mean that the bedrooms are unused).

<sup>88</sup> Bexley (43 per cent), Bromley (51 per cent), Havering (45 per cent), Kingston-upon-Thames (43 per cent); Richmond upon Thames (48 per cent); Sutton (41 per cent)

### Decent homes and fuel poverty

- 5.6.26 Around 21 per cent of homes in London are below the official Decent Homes standard<sup>89</sup> and has fallen faster in London than in the rest of England since 2006. 30 per cent of private rented homes in London are below the Decent Homes standard, compared to 18 per cent of owner occupied and 19 per cent of social rented homes. The proportion of homes below the standard has fallen significantly in each tenure since 2006. The number of affordable homes in London below the Decent Homes standard has fallen from 260,300 in 2005 to 79,800 in 2014. Around a tenth of London households are estimated to be living in fuel poverty, just below the national rate. For more information on fuel poverty, please see the energy baseline section.

### Accessibility

- 5.6.27 Around 30 per cent of households in London include a person with a long standing illness, disability or impairment which causes substantial difficulty with day to day activities<sup>90</sup>. English Housing Survey data suggests that 180,000 households, 6 per cent of all households in London, say the illness or disability of one or more household members requires adaptation(s) to the home. Of these, around 20,000 households say they are currently attempting to move to find a more suitable home.
- 5.6.28 The English Housing Survey (EHS) grades the accessibility of the existing housing stock by reference to the four 'visitability' features<sup>91</sup>. GLA analysis of EHS data<sup>92</sup> shows that around one fifth of all homes in the capital have no 'visitability' features – over half a million dwellings<sup>93</sup>. A further 1 million homes have only one 'visitability' feature and only 9 per cent of London's existing housing stock is estimated to exhibit all four 'visitability' features (less than 300,000 homes).
- 5.6.29 In terms of planning approvals, the London Plan Annual Monitoring Report shows that a very high proportion of new build units in London currently comply with Lifetime Homes standards (93 per cent)<sup>94</sup>. However, due to the time lag between approvals and completions particularly on approved large schemes, only 59,000 units have been completed which meet Lifetime Homes standards since the standards were introduced in 2004 London Plan<sup>95</sup>.

### Demographic forecasts

- 5.6.30 Whilst London has a relatively young existing population profile compared to other areas in England, 20 per cent of households include someone aged over 65, and the overall number of these older person households in the capital is substantial – nearly 700,000<sup>96</sup>. This is expected to increase to over 1 million households during the period of the Plan (2019 to 2041). This will

<sup>89</sup> This is a composite measure of dwelling stock conditions that takes into account minimum standards, thermal comfort, kitchen and bathroom facilities and the general state of repair. London's 'non-decency' rate is not significantly different from the national average of 22 per cent or from most other regions.

<sup>90</sup> DWP, Family Resources Survey (2013/14)

<sup>91</sup> These are: level access; flush threshold; a sufficiently wide door and circulation space to move around; and use of a WC on the ground or entry floor.

<sup>92</sup>

<sup>93</sup> DCLG and ONS, English Housing Survey, 2012

<sup>94</sup> Mayor of London, London Plan, Annual Monitoring Report 11, 2013-14, GLA,

<sup>95</sup> London Development Database, Lifetime Homes completions 2004/5 to 2014/15

<sup>96</sup> GLA Intelligence Unit (2013) household projections (central trend), GLA

represent an increase of 50 per cent (over 350,000 additional households) and will mean that older person households will constitute 25 per cent of all households in London. Particularly substantial increases are expected in the number of households with representatives aged over 85, which are forecast to more than double.

- 5.6.31 GLA's evidence<sup>97</sup> estimates that the potential demand for specialist retirement housing which cannot be met from existing stock is of the order of 3,900 units a year. This estimate is based on the assumption that 15 per cent of households aged 75 and over and 2.5 per cent of households 65-74 are likely to require specialist older persons housing. It also takes into account existing levels of provision and the current pipeline.
- 5.6.32 Poor quality homes, insecure housing and overcrowding can significantly effects people's mental and physical health. These effects may also disproportionately impact certain vulnerable group such as older people, those on low incomes, BAME groups or disabled groups.

### Gypsies and travellers


- 5.6.33 The London boroughs conducted a joint Gypsy and Traveller Accommodation Assessment in 2009, but have not repeated the exercise on a joint basis since then. Boroughs are responsible for assessing needs at the local level and addressing these needs in light of local circumstances and in line with government guidance and the London Plan.

### Government reforms

- 5.6.34 There are currently a large number of reforms being progressed by Government through the Housing & Planning Act and proposed changes to the National Planning Policy Framework (NPPF). These include proposals for starter homes, extensions to 'right to buy' to include housing association tenants and the proposed sale of vacant council houses in high value areas. In addition, proposed changes to the National Planning Policy Framework have been put forward which would change the definition of affordable housing by removing 'in perpetuity' requirements to enable the provision of starter homes and other intermediate housing products.
- 5.6.35 Government has also made permitted development rights for change of use from office to residential permanent, with the current exemptions ceasing at the end of May 2019 and will need to be replaced with Article 4 Directions by local planning authorities, subject to Secretary of State approval. A consequence of this liberalisation is that new homes delivered through these permitted change of use do not need to accord with affordable housing policies or meet residential or accessible housing design standards.
- 5.6.36 These Government reforms will cumulatively impact on London's ability for overall delivery of new homes as well as for different tenures. The new London Plan will therefore need to carefully consider the potential impacts of these reforms as well as the other issues of supply and demand outlined above.
- 5.6.37 Ensuring a sufficient supply of quality homes, of the type that people desire and can afford, in the right places for residents to access a range of employment opportunities, as well as

<sup>97</sup> Three Dragons and Celandine Strategic Housing, 2014, - Older Persons Housing Needs Assessment Report 2013

necessary services and amenities, is of fundamental importance to London’s global success and the quality of its offer to a competitive workforce. If businesses find it harder to recruit skilled worker due to the cost and availability of housing then they will consider locating elsewhere.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Lack of affordable housing</li> <li>• Under supply of homes which meet the needs of Londoners (size, type, tenure)</li> <li>• High level of approvals, low level of completions</li> <li>• Increasing costs of housing relative to wages</li> <li>• Homelessness</li> <li>• Implications for delivery from major Government reforms to housing legislation and policy</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Diversifying the sector - build to rent, SMEs</li> <li>• Diversify the range of sites</li> <li>• Turning approvals in to completions, helping to ensure new approvals are built out (review mechanisms).</li> <li>• Provide greater certainty within the planning system, particularly around the level of affordable housing required.</li> </ul>
<b>Implications of the plans and programmes review</b>	To significantly increase the delivery of housing, including a mix of size, tenures and affordable products
	
<b>Suggested IIA Objectives</b>	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand

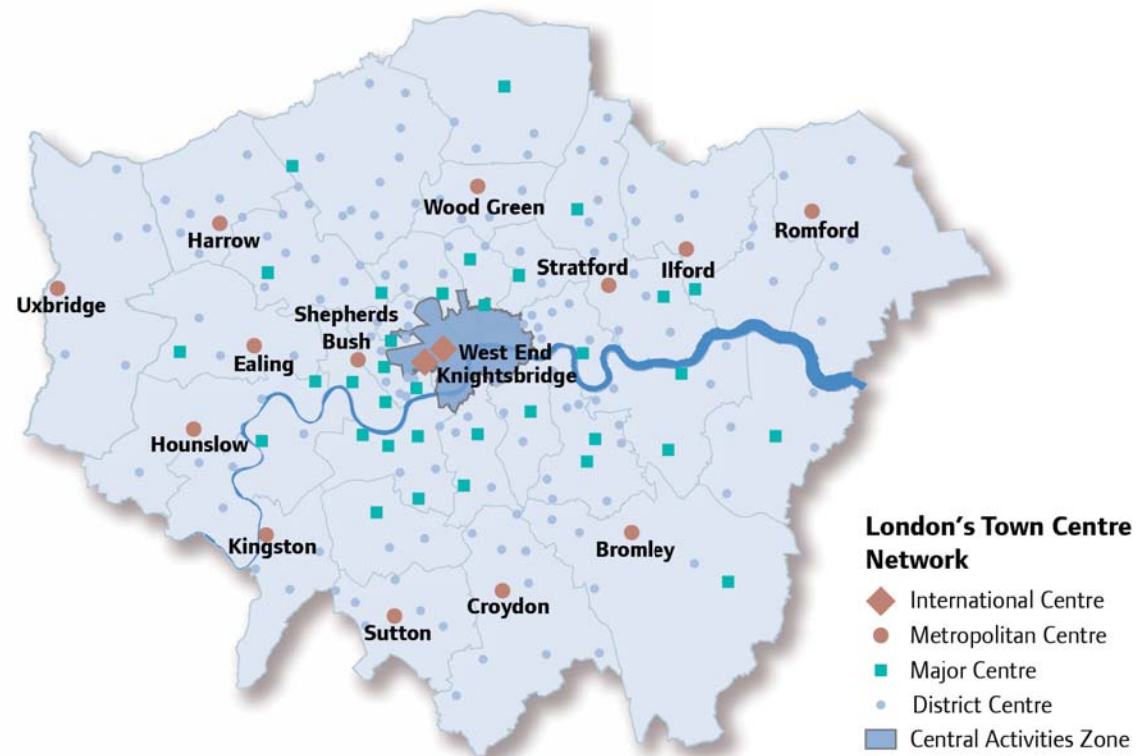
## 5.7 Sustainable Land Use

The use of land that is developed or undeveloped, brownfield and greenfield, agricultural or urban and the associated density of development

- 5.7.1 London saw a large expansion in its population and geographic area up until the Second World War. Urban land was not in restricted supply because new transport – commuter rail, trams, London’s underground and then arterial roads – opened up land as it was needed. The expansion of London meant it absorbed towns such as Croydon, Kingston, Harrow and Romford within its boundary.
- 5.7.2 The introduction of the 1947 Town and Country Planning Act, which changed development rights and introduced urban containment policies such as greenbelts saw a change in the way London developed. A reduction in the densities at which people lived, coupled with Government policy of decentralisation through measures like the building of the New Towns resulted in London’s population started to fall, reaching a low of 6.7 million by 1988.
- 5.7.3 However, since 1988 London’s population has increased every year. Even during the economic downturn of the early 1990s and the more recent recession in the late 2000s, London’s population grew and overall growth accelerated. The main reasons for this change is more people of childbearing age moving to the city, leading to strong natural population growth (the surplus of births over deaths). London’s current population is 8.6 million and it is expected to continue to growth at c70,000pa.
- 5.7.4 London’s continued economic success (which is discussed in more detail in section 5.10) will, alongside demographic factors, drive population growth. The spatial distribution of growth is fundamental to preparation of the London Plan. A number of spatial scenarios for managing that growth and the infrastructure needed to underpin it are currently being explored.
- 5.7.5 In terms of London’s future growth, it is important to consider the current geography of activities within London and how they might be impacted in the future. Inner London is characterised by a strong focus on commercial, cultural and employment activities, whilst outer London comprises of mostly residential activities. As a result, economic development within the city has developed a distinct geography that is predominately focused on the central area.
- 5.7.6 The Central Activities Zone (CAZ) covers London’s geographic, economic and administrative core. It brings together the largest concentration of London’s financial and globally-oriented business services. Almost a third of all London jobs are based there and, together with the Northern Isle of Dogs (including Canary Wharf), it has historically experienced the highest rate of growth in London. Employment in the CAZ and Northern Isle of Dogs is expected to grow substantially, particularly driven by expansion of the office-based business services sector, as well as more jobs in areas like retail and leisure services.
- 5.7.7 Town Centres are also of fundamental importance to the capital and are the focus for a wide range of uses including shopping and leisure, arts and culture, housing and employment, civic and social infrastructure. They also serve as community hubs, providing a sense of place and identity, and often include valued historic buildings, spaces and uses. Figure 5.18 shows the spatial network of different types of town centres within London.



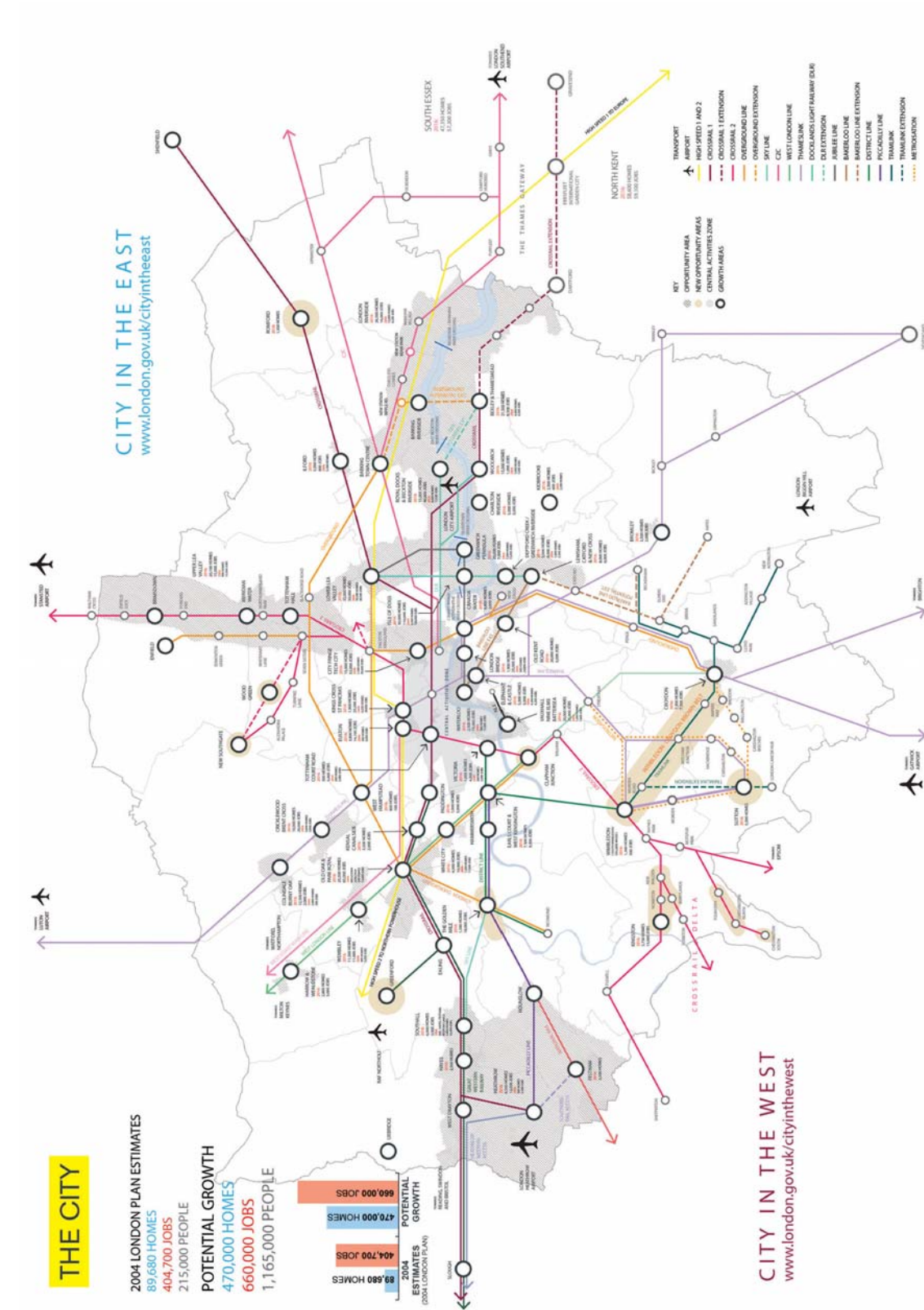
Figure 5.18: Town Centre Network



© Crown Copyright and database right 2014. Ordnance Survey 100032216 GLA

- 5.7.8 Current London Plan policy highlights town centres generally as a focus for growth however it is likely that there will be even greater emphasis for higher density residential growth in the future, potentially with a more targeted approach to identifying specific town centres to help target resources more effectively to increase delivery.
- 5.7.9 Opportunity Areas are the capitals major reservoirs of brownfield land also have significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport. Almost two thirds of the land within Opportunity Areas (measured by area) is in outer London, a quarter in inner London and the remaining tenth in and around the Central Activities Zone. The largest concentrations of Opportunity Areas follow the River Thames to the east, along the Upper Lea Valley to the north, and around Old Oak Common/Park Royal and Heathrow in the West. Figure 5.19 shows their distribution and relationship to each other.
- 5.7.10 The Opportunity Areas are diverse, ranging in size from 3,900 hectares (Upper Lea Valley) to 19 hectares (Tottenham Court Road). Some, particularly in the east of London, require significant public intervention whereas for others the market will be stronger. They are and will continue to be of fundamental importance in delivering London's future growth.
- 5.7.11 Intensification Areas are typically built-up areas with good existing or potential public transport accessibility. Their importance is likely to grow in the delivery of higher density housing as the competition for land becomes even more intense.

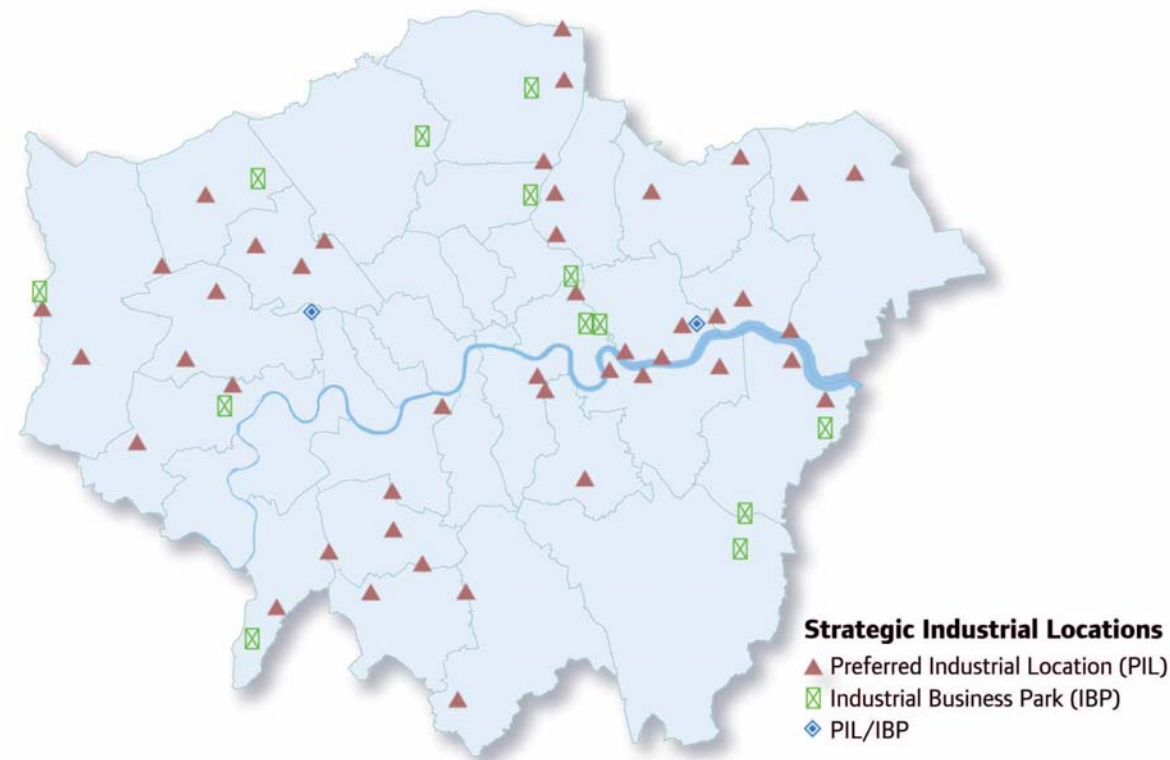
Figure 5.19: Opportunity Areas



## Industrial Land

5.7.12 Figure 5.20 shows the spatial distribution of London's Strategic Industrial Locations, which comprise about 50 per cent of London's total supply of industry.

**Figure 5.20: Strategic Industrial Locations**



Source GLA: © Crown copyright. All rights reserved. Greater London Authority 100032216 (2011)

5.7.13 SILs are important in supporting the logistics system and related infrastructure which are essential to London's economic function and competitiveness. They are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses. Most are over 20 hectares in size although in some areas, especially parts of west and south-west London where there is particular pressure on industrial land, smaller locations, for example of 10 hectares, can be of strategic importance.

5.7.14 Current London Plan policy is of managed release of surplus industrial land, however due to intense pressure for residential development, land is currently being released at almost 3 times the recommended amount ; more details can be found in section 5.10. Studies are currently being updated to understand the relationship between demand and supply of industrial land, in particular the effect the higher rate of release might be having spatially in London.

## Accommodating Growth

5.7.15 Due to the scale of growth expected and the limited supply of land, there is an inherent tension between the delivery of housing versus that of other land uses, in particular

employment, and competition between them can impact on the spatial and economic structure of the city. How London will accommodate this growth is fundamental to the preparation of the new London Plan.

5.7.16 The most recent SHMA (Strategic Housing Market Assessment 2017) identified a need for 66,000 homes per year. The most recent SHLAA (Strategic Housing Land Availability Assessment 2017) has identified capacity for 65,000 homes per year.

5.7.17 This step change in housing requirements means it is essential that the new London Plan is more delivery focused.

5.7.18 The new London Plan not only identifies new sources of capacity but is clear that land needs to be intensified, particularly where there is good public transport connectivity.


5.7.19 There are both advantages and disadvantages to higher densities. Economic advantages of higher densities include improving a city's economic efficiency and employment opportunities through agglomeration of businesses, increases in productivity levels and the provision of a critical mass to support social and physical infrastructure, including a more viable and efficient public transport network. Higher densities can also lead to a greater choice of homes thereby reducing social inequality; however higher densities can also have impacts on the valued character of places, lead to more cramped living conditions, a loss of privacy, increases in noise and nuisance, contribute to a lower overall sense of community and have an impact on people's mental health and wellbeing . As with many impacts, these vary depending on the circumstances of the individual.

5.7.20 Ensuring a strong relationship between the scale and intensity of development and connectivity of public transport will continue to be a central axiom of the London Plan. In order to close the gap between need and capacity, outer London boroughs are likely to have to make a more substantial contribution to meeting their projected housing growth and overall housing need.

5.7.21 The growing gap between demand and supply for homes in London poses many challenges, not least house price inflation, bridging the affordability gap and meeting the needs of different groups of Londoners. In terms of employment, failure to provide sufficient and suitable employment land at competitive prices could diminish access to employment opportunities, putting at risk the achievement of sustainable, mixed and balanced communities, as well as potentially compromising London's international competitiveness.

5.7.22 Accommodating forecast growth within London's existing boundaries will rely on greater integration between land use and transport planning. Growth will need to be accommodated in a way that delivers more housing that is accessible and affordable for Londoners and a continued shift towards public transport, walking and cycling. The London Plan will need therefore need to consider the ability of London to accommodate its need within its boundaries and consequentially its relationship with the wider region. This might entail partnerships with authorities beyond London where infrastructure investment might enable an uplift in development in appropriate locations; in particular strategic transport corridors eg along the London-Stansted-Cambridge corridor and possibly associated with an extension of Crossrail 1 along the south of the Thames estuary; and/or possibly extensions to other existing towns outside London.

5.7.23 The decision on future of airport capacity in the South East will also have significant effect on the location of future development pressures in London. Not only in terms of associated infrastructure and transport links but also in terms of economic opportunities and connections to the rest of the UK.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Inability for London to accommodate required growth within its boundaries</li> <li>• Unsustainable patterns of development within and across London’s boundaries</li> <li>• Higher density developments</li> <li>• Competing pressures for land impacts on ability to provide social, physical and environmental infrastructure</li> <li>• Non-efficient use of land</li> <li>• Integration of land use and transport</li> <li>• Spatial impact and consequential development pressures resulting from decision on London’s future airport capacity</li> </ul>
<b>Opportunities</b>	Targeted intensification of focused areas Growth corridors supported by infrastructure investment
<b>Implications of the plans and programmes review</b>	Ensure the most efficient use of land which adheres to the principles of sustainable development and considers London’s relationship as part of a city region
	
<b>Suggested IIA Objectives</b>	To make the best and most efficient use of land so as to support sustainable patterns and forms of development.

## 5.8 Connectivity

One’s ability to reach employment, education, shops, recreation, friends, family and health and social services measured by whether the infrastructure is in place and whether it is able to accommodate demand

- 5.8.1 Transport issues will be principally addressed in the review of the Mayor’s Transport Strategy, which is being undertaken in parallel to the London Plan review. However, improvements to London’s transport system and accessibility for all Londoners will remain key considerations for the London Plan. Importantly the new London Plan will need to ensure coordination of land use and transport planning and the provision of infrastructure and services to address the needs of a growing and increasingly diverse city.
- 5.8.2 Connectivity relates to ease of reaching employment, education, shops, recreation, friends, family and health and social services by different modes of transport i.e. public transport, private transport, cycling and walking. Good connectivity can help to improve mental wellbeing and personal resilience as well as reduce stress and social isolation. Good connectivity is particularly important for people on low incomes who may not be able to afford all types of transport and therefore have fewer options to connect to facilities and services.
- 5.8.3 At present, almost 800,000 people commute into London for work<sup>98</sup> and the GLA estimates that this will grow to more than a million by 2041. The centralisation of jobs in the CAZ generates growth in demand for radial peak travel and a continuing ebb and flow of passengers. Sectoral employment trends (discussed in section 5.11) are expected to have an impact on travel demand to work, with public transport mode shares expected to increase and car modal share to reduce. It is expected that the number of trips made by London residents will increase from 20m to 25m per day between 2011 and 2041. Including in-commuting and visitor travel, there will be close to 32.2m trips in London on an average day in 2041<sup>99</sup>.

### Public transport

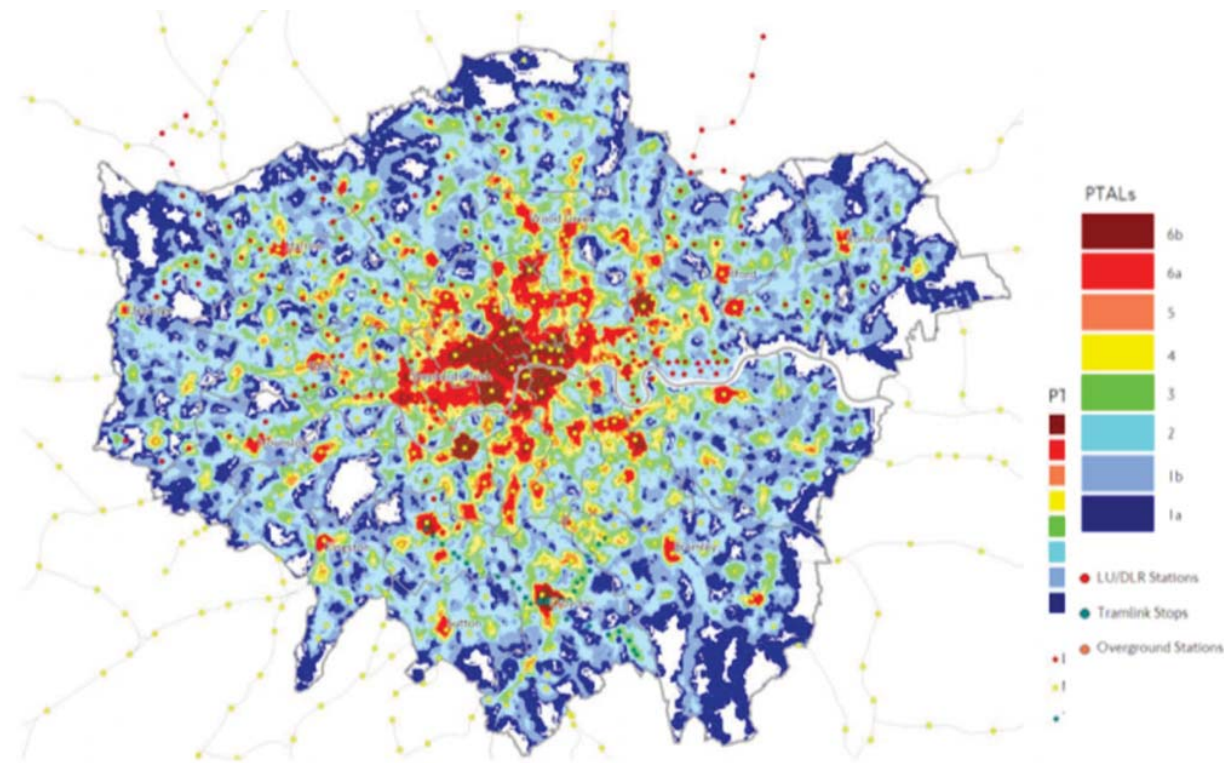
- 5.8.4 London benefits from a well-developed public transport network, which includes the Underground, National Rail services and an extensive bus network, which provide a high level of transport connectivity. Connectivity can be impacted by busy wide roads, railways and rivers which can sever destinations which are geographically close but as a result of the road (the infrastructure itself or the volume and/or speed of traffic it carries), railway or river, cannot be easily reached.
- 5.8.5 Connectivity to the public transport network in London is measured by using TfL’s Public Transport Access Level (PTAL). The PTAL value combines information about how close public transport services are to a site and how frequent these services are. It does not include where these services actually take people to or indeed how accessible they are to all members of the population.
- 5.8.6 The highest level of connectivity has a PTAL score of 6b and the lowest has a PTAL score of 0. As shown in Figure 5.21, generally the central London and metropolitan centres including

<sup>98</sup> GLA Economics (2016) Economic Evidence Base Chapter 3

<sup>99</sup> Transport for London (2016), Travel in London Report 9

Uxbridge, Harrow, Wood Green, Stratford, Ilford, Romford, Bromley, Croydon, Sutton, Kingston, Hounslow, Ealing and Shepard’s Bush are more connected to the public transport system than other parts of London. The predominantly radial orientation of the main public transport corridors is also visible in the figure. It also shows that East London is less connected than West London.

**Figure 5.21: Public transport connectivity within Greater London, 2015**

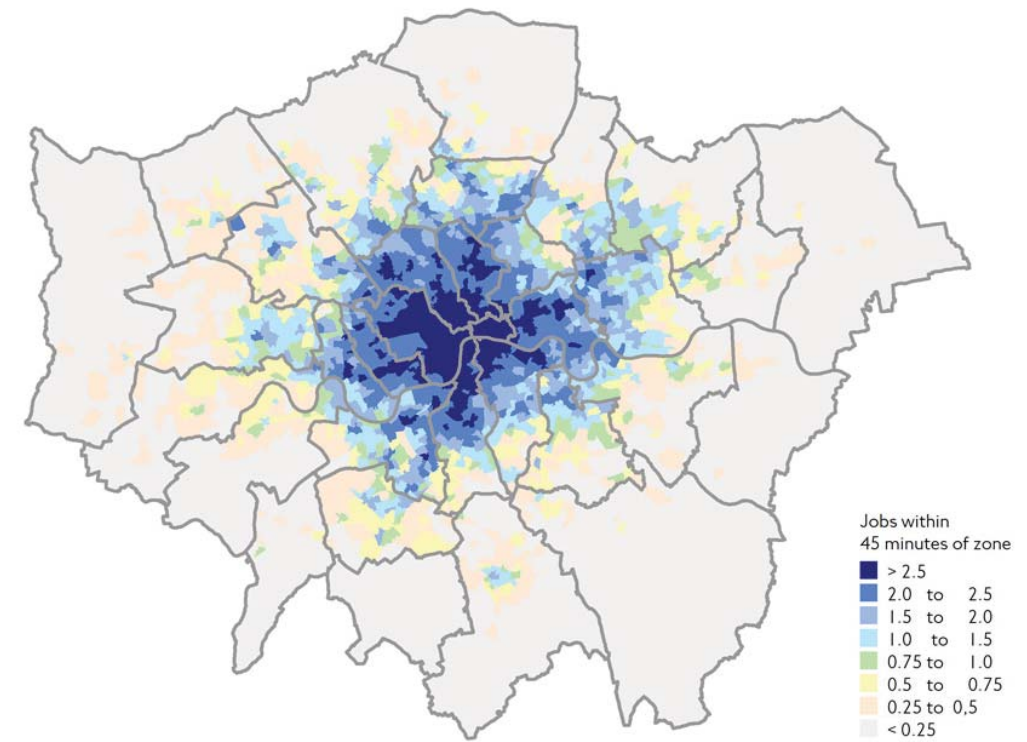


Source: TfL Planning, Strategic Analysis.

*Transport for London (2015) Travel in London. Report 8*

- 5.8.7 It is important to note that PTAL scores do not consider crowding or the ease of interchange. However these elements affect connectivity as they impact on the ‘ease’ of reaching employment, services and facilities by public transport.
- 5.8.8 Another measure of connectivity is the number of jobs (whether filled or currently vacant) that are potentially available within a given travel time – 45 minutes by the principal public transport modes.

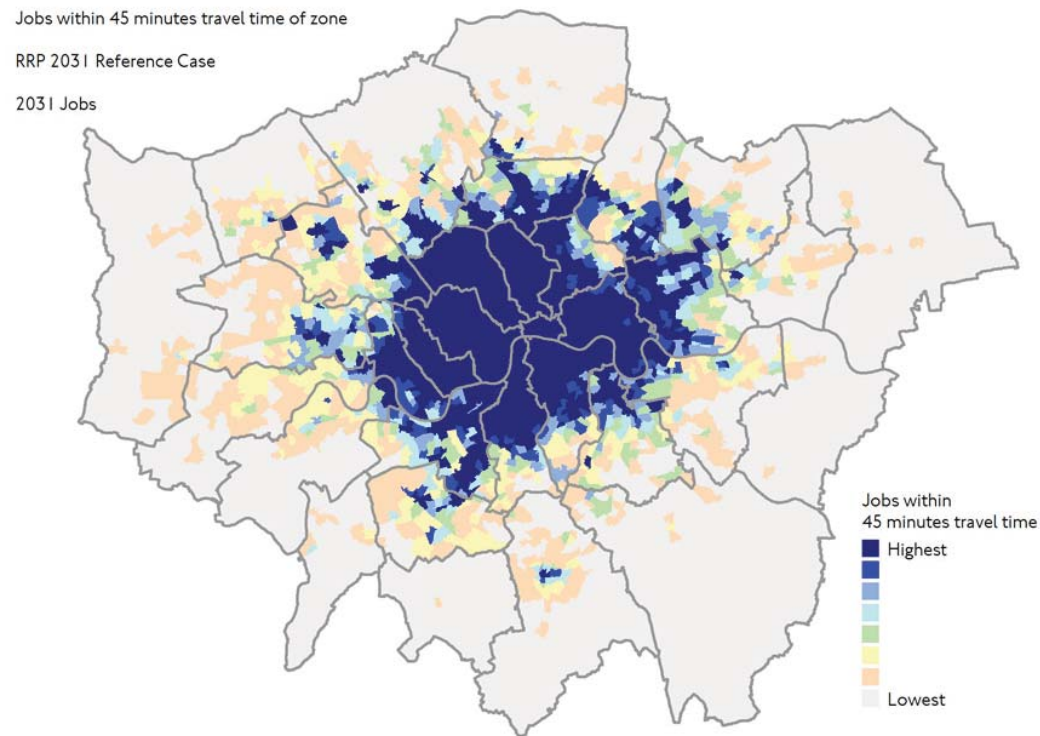
**Figure 5.22: Number of jobs available by mass public transport within 45 minutes. 2015**



*TfL Planning, Strategic Analysis*

- 5.8.9 As might be expected, Figure 5.22 reflects the concentric pattern of employment density and also the primarily radial orientation of the public transport networks. In 2015, typically for people living in outer London, between 0.25 and 0.5 million jobs are potentially within 45 minutes travel time. This rises to around 2.5 million jobs potentially available to a resident of central London. Figure 5.23 shows availability to these results for 2031. The expansion of job catchment is noticeable, reflecting the expansion of the transport network such as The Elizabeth Line (Crossrail) and as well as increased number of jobs in the CAZ. The speed and reliability of journeys to employment opportunities is particularly important in terms of London’s economic competitiveness.

**Figure 5.23: Number of jobs available by mass public transport within 45 minutes. 2031**



TfL Planning, Strategic Analysis

- 5.8.10 The use of public transport including buses, Underground, DLR and Tramlink has risen to its highest levels since the 1950s. It has continued to grow faster than the use of private cars, with a 36 per cent increase in public transport journeys per head of population between 2001 and 2014, as compared to a 21 per cent decrease in car journeys per head over the same period<sup>100</sup>. By 2041, total trips by public transport are predicted to increase from 9.5 million (in 2014) to 12.3 million<sup>101</sup>.
- 5.8.11 There is particularly poor connectivity in east London, largely due to the River Thames which acts as a barrier due to limited river crossings when compared with river crossings in west and central London. There are 20 crossings in west London, 19 in central London and 12 crossings east of Tower Bridge, of which only three are highway crossings. The cross-river bus network in east London is also poor with only one bus route east of Tower Bridge, compared with 47 bus routes that cross the river west of Vauxhall<sup>102</sup>. This is likely to impact the most deprived Londoners living in east London as they tend to use the bus more than other modes of public transport such as the Underground.
- 5.8.12 Fewer connections across the river in east London has spatial economic impacts with residents living in east London having fewer employment options, facilities and services available to

<sup>100</sup> Mayor of London, London Plan AMR 2014/15 KPI 13  
<sup>101</sup> Transport for London (2016) Mayor's Transport Strategy 2016. PowerPoint, 18 February 2016.  
<sup>102</sup> Transport for London (2015) Connecting the Capital. Our plan for new river crossings for London. December 2015.

them. Levels of economic activity are lower and unemployment rates higher in east London compared with the rest of the city and the UK<sup>103</sup>.

- 5.8.13 There is also issue on the lack of orbital connectivity around London, particularly from one outer London borough or 'high street' centre to another. Access to jobs is also poorer in parts of London predominantly dependant on the National Rail network.
- 5.8.14 Overcrowding on public transport is a serious concern. GLA's 'The Big Squeeze, Rail overcrowding in London' (February 2009) reported that overcrowding on trains was a significant problem in 2009 and that the most overcrowded trains were carrying around 40 per cent more passengers than they should have been during the morning and evening peak periods. Since 2009, the growth in public transport trips has increased significantly, maintaining or heightening concerns over overcrowding.
- 5.8.15 Employment growth in central London places significant pressure on the public transport network, and in particular on the rail network. A million additional daytime public transport trips are expected by 2041 to/from/within central London. With demand increasing faster than supply, by 2041 the number of passenger-km exceeding a standing passenger density of two people per square metre, is expected to increase by 60 per cent on London Underground and 150 per cent on National Rail<sup>104</sup>.
- 5.8.16 Figure 5.24 shows the most overcrowded sections on the tube network AM Peak in 2014

**Figure 5.24 The most overcrowded sections on the tube network**



Railplan Scenario WE107A03Y\_SQM\_Ratio, AM Peak Hour

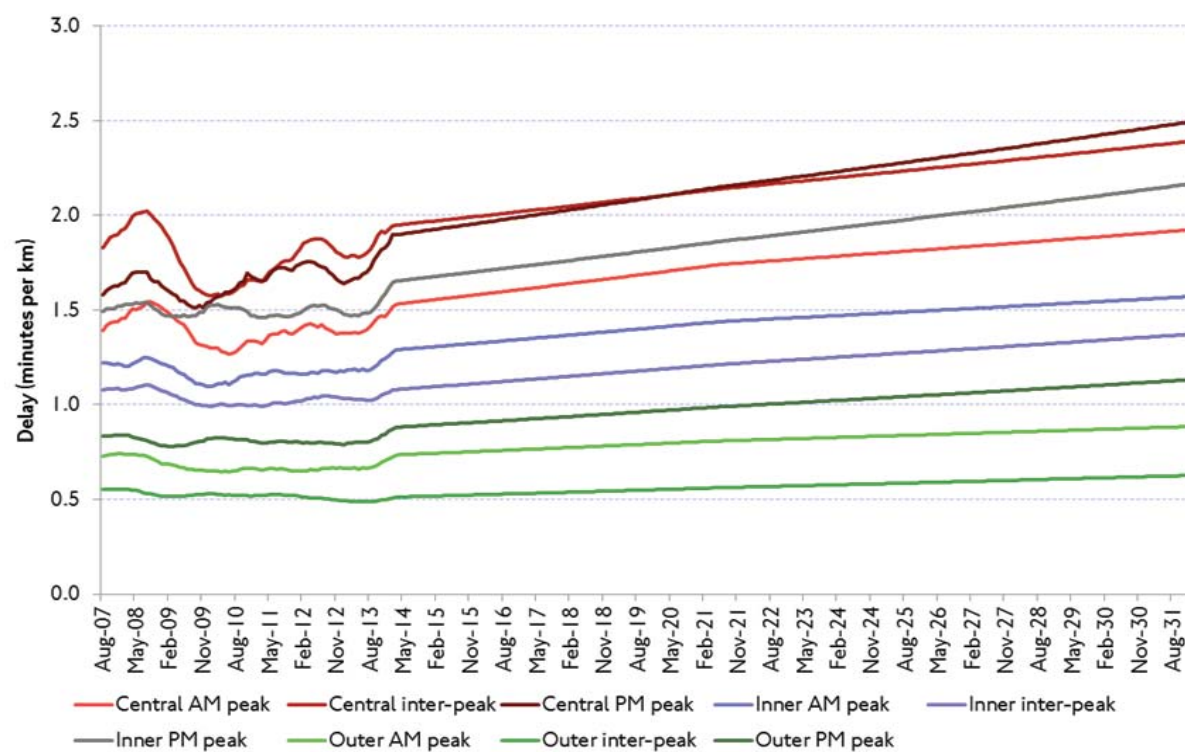
<sup>103</sup> Transport for London (2015) Silvertown Tunnel Preliminary Regeneration and Development Impact Assessment, October 2015. Document reference: ST150030-PLN-ZZZ-ZZ-RP-PC-0019  
<sup>104</sup> Transport for London, London Transport Studies Model, 2016

**Private transport**

5.8.17 London has an extensive road network. Roads and streets in London account for 80 per cent of public spaces in London, 80 per cent of all journeys and 90 per cent of all goods moved<sup>105</sup>. Congestion on the road network makes for a more hostile road environment, reducing the ease of reaching employment, services and facilities by private transport and increasing the costs and inconvenience for business and people. Congestion is caused by high usage of the road but also as a result of incidents which cause delay (maintenance or accident) and has adverse impacts across the wider road network. Increased congestion can also worsen localised air quality, disproportionately affecting more vulnerable groups.

5.8.18 Figure 5.25 shows that road congestion has, on average, increased and is expected to continue to increase, in particular at AM and PM peaks. It further shows that central London has seen the greatest increase in road congestion, followed by inner London and outer London.

**Figure 5.25: Average vehicle delay (minutes per kilometre) by functional sector of London. Working weekdays, by time period**



TfL Planning, Strategic Analysis

5.8.19 A recent study by INRIX and the Centre for Economics and Business Research suggested that London could incur £9.3 billion from traffic congestion by 2030, an increase of 71 per cent from today, costing each car commuting household more than £4,000 a year.

5.8.20 The reallocation of capacity in central London means that, although traffic volumes may decrease, congestion is still projected to rise. However, not all journeys on the road are made

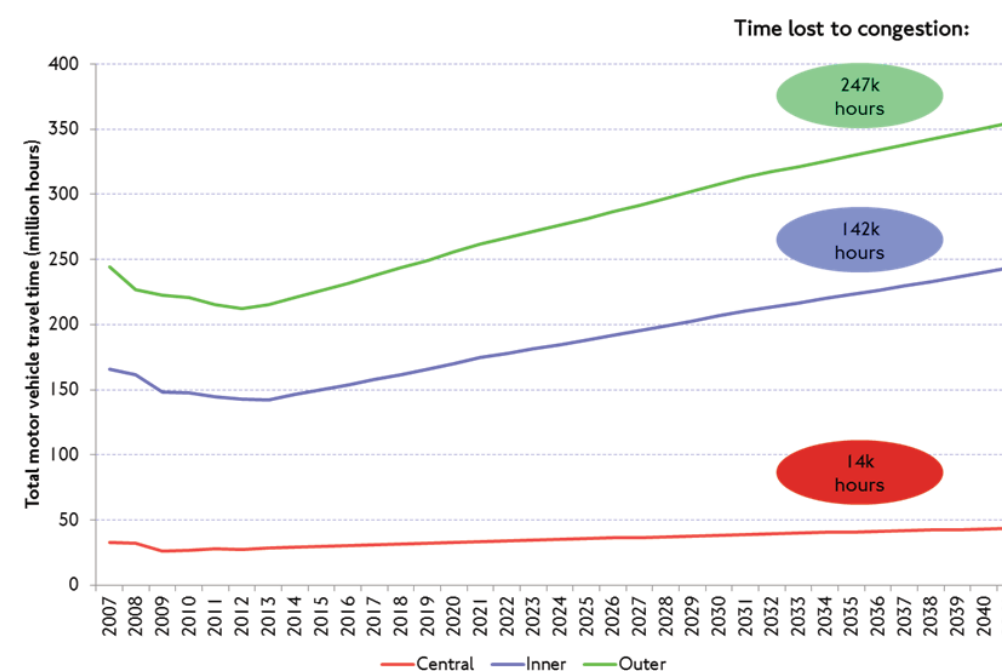
<sup>105</sup> Transport for London. (2015). Roads Task Force. Progress report: a successful first year. April 2015.

by private transport. Buses, taxis and freight also use the road network and more than half of road congestion in central London is caused by these vehicles rather than private transport<sup>106</sup>.

5.8.21 Travel in outer London is more car dependent with fewer public transport options available and thus the economic viability of the region is more dependent on people and goods being able to travel efficiently on the road network. Congestion in outer London is forecasted to grow by 40 per cent compared to 32 per cent in central London<sup>107</sup>. Figure 5.26 illustrates time lost to congestion across the capital by central, inner and outer London areas. The forecasts suggest that congestion per capita will grow fastest in outer London thus increased congestion there could have a more significant economic impact than in central London, despite being 'less congested' on a minutes per km basis.

5.8.22 Additionally, east London suffers from road congestion as a result of limited river crossings between Tower Bridge and Dartford Crossing. These include the Rotherhithe and Blackwall Tunnels which both have restrictions on use by large vehicles and are over capacity, particularly in peak directions at peak periods. Poor cross-London connectivity in east London place limitations on businesses' access to markets as well as residents' connectivity to employment and other opportunities.

**Figure 5.26 Total delay experienced by motor vehicles by functional area of London**



**Cycling**

5.8.23 In 2014 over 615,000 journeys were made each day by bike equating to the equivalent of 10 per cent of bus passenger journeys, one fifth of tube passenger journeys or 100 per cent of all journeys on the District Line<sup>108</sup>. In 2014, across London cycling rose by 10.3 per cent; between

<sup>106</sup> Transport for London (2015) Travel in London. Report 8.

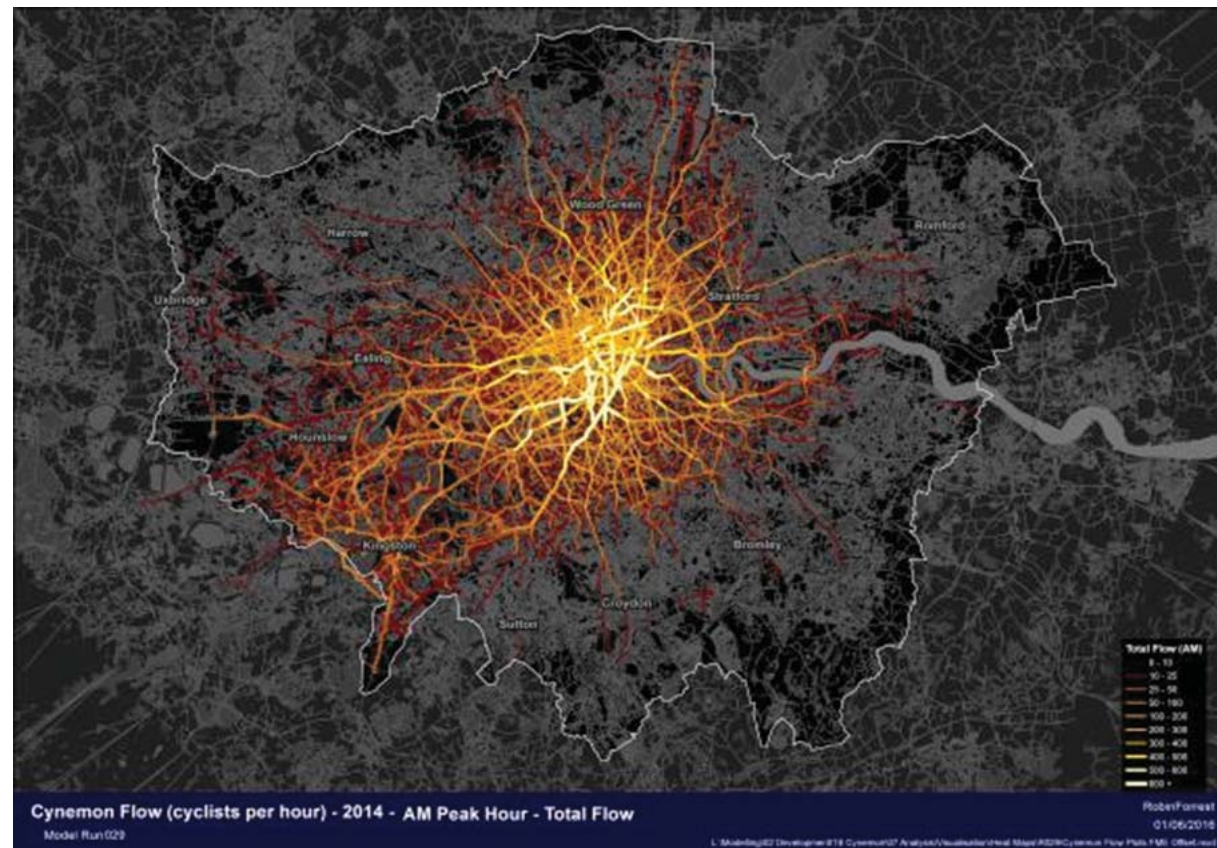
<sup>107</sup> Ibid.

<sup>108</sup> GLA Economics (2016) Economic Evidence Base, Chapter 3,

2008 and 2014 cycling on TfL controlled main roads rose by 63 per cent and cycling on all roads rose by 31.9 per cent<sup>109</sup>. Even though there has been a significant growth in cycling, there still remain significant barriers with the number one deterrent for 75 per cent of those thinking about taking up cycling relating to ‘safety’ and ‘perception of safety’.<sup>110</sup>

- 5.8.24 There has been substantial growth in the number of people choosing to cycle in order to access central London, with flows across the cordon surrounding central London increasing by more than 200 per cent since 2001. The greatest increase in trips made by London residents has been in inner London, up by 133 per cent since 2005/06. Cycling has grown the least in outer London, but has the most potential for growth in terms of trip volumes as only 5 per cent of trips that could be cycled are currently cycled.
- 5.8.25 Figure 5.27 shows the total flow of cyclists per hour in AM peak hour in 2014. In some areas, London’s cycling infrastructure has improved significantly over the past 8 years and has helped to improve connectivity between land uses by cycling. However there are still parts of London with poor connectivity by cycling, including east, south east and north west London.

**Figure 5.27: The total flow of cyclists per hour in AM peak hour in 2014.**



**Walking**

- 5.8.26 Walking accounts for 30 per cent of all trips made by Londoners and two thirds of trips under a mile. Walking is the most common mode used to travel for shopping and to travel to school/college. By 2041 there will be 8 million ‘walk all the way’ trips and 38 million walk stages

<sup>109</sup> Mayor of London (2016), Human Streets. The Mayor’s Vision for Cycling, three years on. GLA  
<sup>110</sup> Transport for London, December 2010, ‘Analysis of Cycling Potential: Policy Analysis Research Report

(walking as part of a trip by another mode) daily in London<sup>111</sup>. The majority of the growth of walking is expected to be in inner London, reflecting the distribution of development and also the greater reliance on public transport in inner London. However there is also significant potential to encourage walking for shorter journeys that are currently made by car in outer London.

- 5.8.27 The demand for high quality streets and public spaces that support physical, social and economic activity will increase as London’s population grows and changes. The design of new places will have a significant impact on how much walking people do. Many streets in central and inner London already suffer from pedestrian overcrowding and low levels of pedestrian comfort. Particular challenges arise at major rail termini and on busy high streets on the strategic road network, where the needs of pedestrians conflict with the movement requirements of other modes of transport.
- 5.8.28 Green infrastructure and green corridors also helps to improve connectivity between places and encourages walking. Attractive well connected green spaces make a significant contribution to the identity of neighbourhoods often reinforcing cultural and historical character, encouraging healthy active lives whilst also supporting natural biodiversity ecosystems and helping to tackle the impacts of climate change and air pollution. Whilst 33 per cent of land in London was covered by green space (excluding gardens)<sup>112</sup> in 2013, over 86 per cent of London is still considered deficient in access to at least one type of public open space. These green corridors are essential for improving sustainable travel connections. More details on green infrastructure and corridors are discussed in section 5.19.


**International and national gateways**

- 5.8.29 Almost 800,000 people commute into London for work; this is predicted to rise to more than a million by 2036<sup>113</sup>.
- 5.8.30 In 2015 there were 18.6 million international tourist visits in 2015 (accounting for 108.3 million nights, average nights per visit is 5.8) and 12.9 million in domestic tourist visits (accounting for 30.2 million nights, average nights per visit is 2.33). In terms of day times there were 280 million tourism day visits, although just under 75 per cent of all tourism day visits in the capital are actually from Londoners<sup>114</sup>.
- 5.8.31 International, national and region arrivals into London come by air, rail, road and coach. There is only one railway station with international connections: St. Pancras. There are a number of mainline railway stations served by national rail that provide long distance services to major economic centres elsewhere in the UK (Manchester, Birmingham, Leeds, Edinburgh, Glasgow) as well as allowing access to the employment zones of London for many areas. High Speed 2 (HS2) will aid in providing significant changes to national rail connections across Britain and will help take pressure off long distance high speed services on the West Coast Main Line, Midlands Main Line and East Coast Main Line. Elizabeth Line (Crossrail) when it opens in 2035 will also significantly improve London’s connectivity with the surrounding region.
- 5.8.32 The main airports serving London are Heathrow, Gatwick, Stansted, Luton and London City; with Gatwick and Heathrow accounting for 27,780 and 41,643 flights pa respectively<sup>115</sup>. In the

<sup>111</sup> Transport for London (2016) Mayor’s Transport Strategy 2016. PowerPoint, 18 February 2016.  
<sup>112</sup> Greenspace Information for Greater London datasets, 2013  
<sup>113</sup> GLA Economics (2016) Economic Evidence Base, Chapter 3  
<sup>114</sup> GLA Economics (2016) Economic Evidence Base, Chapter 5  
<sup>115</sup> [https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard\\_Content/Data\\_and\\_analysis/Datasets/Airport\\_stats/Airport\\_data\\_2016\\_07/Summary\\_Airport\\_Statistics.pdf](https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Data_and_analysis/Datasets/Airport_stats/Airport_data_2016_07/Summary_Airport_Statistics.pdf)

year to December 2015, it is estimated that 75 million passengers went through Heathrow. Since 2010, passenger numbers have increased by 13.8 per cent<sup>116</sup>.

5.8.33 The connectivity and accessibility of airports, through their supporting physical infrastructure, facilitates greater business opportunities to the wider UK economy as well as London. The decision on the future of airport capacity in the South East will have significant effect on the location of future development pressures in London and therefore the connectivity of different parts of London to both the UK but also global markets.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Poor orbital connectivity by all modes of public transport in outer London</li> <li>• Poor connectivity across the River Thames in east London</li> <li>• Reduced transport connectivity across London as a result of congestion and overcrowding on services and roads</li> <li>• Reduced connectivity across London by walking as a result of congestion and overcrowding on pavements and footpaths</li> <li>• Increasing airport capacity will impact on the spatial and economic fabric of the city</li> <li>• Deficiencies in access to open space</li> <li>• Poor connectivity to green infrastructure for all</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Increase the number of river crossings in the east of London</li> <li>• Metroisation to help improve frequency of services – link up with interchanges</li> <li>• Integration of maintenance works to reduce disruption, congestion and consequences impacts on business and people</li> <li>• Improve connectivity by all modes of public transport across London</li> <li>• Promote more orbital connections</li> <li>• Promoting rail and water transportation for freight.</li> <li>• Design of built environment to improve green connections</li> </ul>
<b>Implications of the plans and programmes review</b>	Integration of land use and transport planning to ensure growth is sustainable and optimises connectivity throughout London. The green network also provides connections which has many health and environmental benefits.
	
<b>Suggested IIA Objectives</b>	To enhance and improve connectivity for all (to and from and within and around London) and increase the proportion of journeys made by sustainable and active transport modes

<sup>116</sup> GLA Economics (2016) Economic Evidence Base, Chapter 3

## 5.9 Accessibility

Ability of all people to access the built environment, transport system and its infrastructure, including those with physical, sensory or cognitive impairments

- 5.9.1 Everyone should be able to live, participate and work in a safe, healthy, supportive and inclusive environment and enjoy opportunities the city has to offer. They should be able to be able to access public transport and active travel modes (including walking, cycling and public transport), to services and facilities that are relevant to them that offer healthy choices, and that accommodate and provide effectively for the diversity of population.
- 5.9.2 The design of the spaces between buildings, public space, open space and amenity areas are just as important as the buildings themselves, and if designed well can enable people to navigate their way easily around their neighbourhood and the city through high quality barrier free spaces to inclusive buildings and facilities.
- 5.9.3 “Analysis of the English Housing Survey identifies that currently 19 per cent of the population of London (circa 1.5m) has a long-standing illness, disability or infirmity<sup>117</sup>. However London’s population is set to change in composition, which could significantly increase this proportion. London will continue to be younger than elsewhere in England and Wales – there will be 17 per cent more school age Londoners in 2036 and 28 per cent more aged 35-64. At the same time, the projected number of people over 64 is projected to increase by 64 per cent (nearly 580,000) to reach 1.49 million by 2036. The over 90s are expected to grow in number, by 89,000, as medical advances, improvements in lifestyles and new technologies support improved life expectancies<sup>118</sup>. Social infrastructure will need to be planned to address the needs of this changing population.
- 5.9.4 The current London Plan sets out a commitment to ensuring equal life chances for all Londoners, emphasising and recognising that this is key to tackling the huge issue of inequality across London. It is therefore essential to identify the physical and social barriers which act to ‘disable’ and prevent people participating in society.
- 5.9.5 The design of the external environment and the public realm can also significantly impact on people health and well-being, their ability to access services and participate in civic life. However there is currently a lack of quantitative data available about the accessibility of the built environment.
- 5.9.6 For many people the availability of accessible and reliable public transport is needed to lead an active and independent life. People can often feel excluded from using public transport if they are concerned about safety due to anti-social behaviour or if they are unable to easier understand where or how to make public transport journeys, especially pertinent to people with cognitive impairment, (whether lifelong or associated with dementia), lack of literacy or mental illness<sup>119</sup>.

<sup>117</sup> GLA Economics, analysis of English Housing Survey 2008/09 to 2011/12

<sup>118</sup> ONS Census, GLA 2015 trend-based population projections (long-term migration scenario)

<sup>119</sup> Transport for London (2015) Your accessible transport network. Our commitment to making it even easier for you to travel around London. May 2015 update




- 5.9.7 Seven groups of people who typically face increased barriers to public transport use include<sup>120</sup>:
- Black, Asian and minority ethnic people (BAME) (40 per cent of Londoners);
  - Women (51 per cent of Londoners);
  - Older people (aged 65 or over) (11 per cent of Londoners);
  - Younger people (under the age of 25) (32 per cent of Londoners);
  - Disabled people (14 per cent of Londoners);
  - People living in a lower income household (income of less than £20,000 per year) (37 per cent of Londoners);
  - Lesbian, gay and bisexual people (LGBT) (2.5 per cent of Londoners).
- 5.9.8 TfL’s ‘Your accessible transport network’ (2012 and May 2015 update) identifies barriers to people being physically able to access public transport, including:
- Inability to get to the train platform i.e. no step-free access;
  - Inability to get onto the train carriage or bus e.g. large gap between platform and carriage, uneven access or no ramp;
  - No designated wheelchair space;
  - No audio and/or visual announcements;
  - BAME Londoners (65 per cent), 16-24 year-olds (62 per cent) and women (59 per cent) are most likely to mention overcrowding as a barrier to using public transport<sup>121</sup>.
- 5.9.9 Out of 270 currently functioning stations across TfL’s Underground and Overground network, 67 tube stations and 56 London Overground stations have step-free access; including all DLR stations are step-free. This therefore leaves a significant proportion of the public transport network inaccessible to many including many disabled people, those carrying heavy luggage, people accompanied by a child under 5 (and therefore probably using a buggy or pram) and older people with mobility issues<sup>122</sup>. The number of step-free stations is expected to increase with plans to make more stations step-free over the next ten years: New stations built as part of the Metropolitan line extension, Northern line extension and the Elizabeth line (Crossrail) will have step-free access. TfL acknowledge that more work is needed to make London’s transport network more accessible and they are investing money to make improvements, including providing alternative services to help alleviate physical accessibility related impacts.
- 5.9.10 Passengers with sensory or cognitive impairments (‘hidden’ or ‘non-physical’ disabilities) also face a range of obstacles to the use of the public transport network or the build environment generally. These could include a lack of confidence and/or understanding. This alternative forms of communication (including travel information on how to undertake a fully accessible journey), signage, lighting, and permeable and legible routes can help.

<sup>120</sup> Transport for London (2015) Travel in London: Understanding our diverse communities. September 2015

<sup>121</sup> Transport for London (2015) Travel in London: Understanding our diverse communities. September 2015.

<sup>122</sup> Transport for London (2012) Your accessible transport network. The Mayor’s commitment to making it even easier for you to travel around London.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Poor design of the built environment, not adopting an inclusive design approach from the outset.</li> <li>• Barriers to using public transport</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Development of ‘inclusive neighbourhoods’</li> <li>• Provision of more inclusive public transport system</li> </ul>
<b>Implications of the plans and programme review</b>	The need for people to be able to easily access jobs, housing, green spaces, education, healthcare and amenities and be able to easily navigate their way through the built environment.
	
<b>Suggested IIA Objectives</b>	To maximise accessibility for all in and around London

## Economic

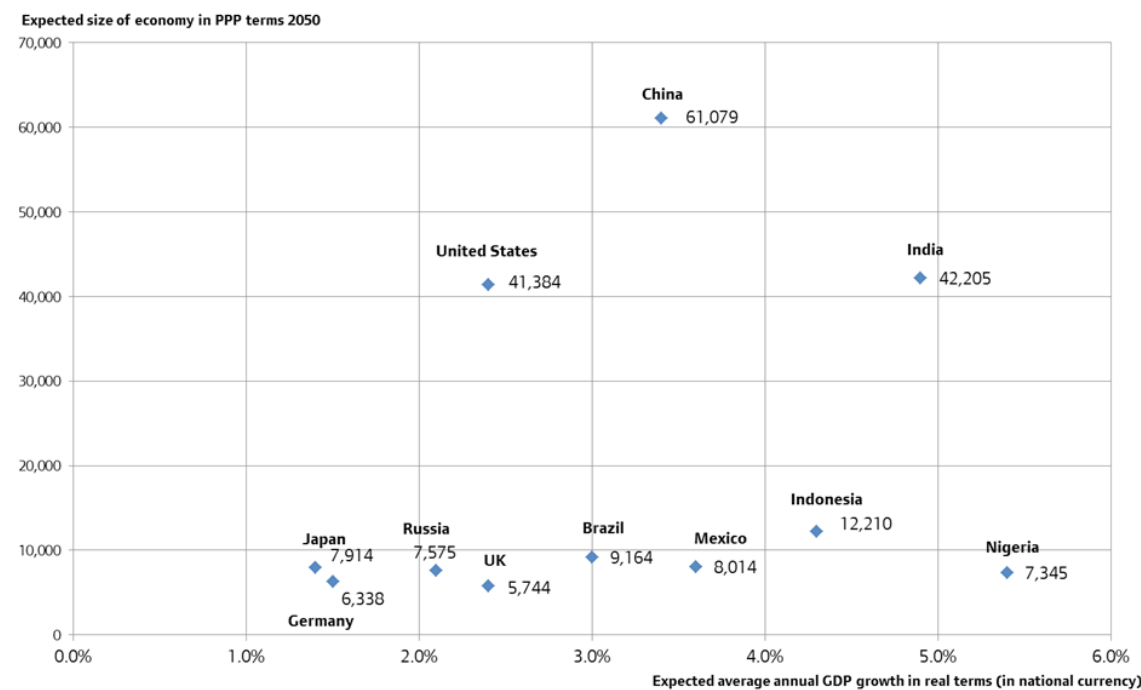
### 5.10 Economic Competitiveness

The relative economic performance of London as a major international city

#### Changing global economy

- 5.10.1 Through globalisation, London has become increasingly specialised in certain activities and has built upon its comparative advantages. Many factors explain why London remains a highly competitive location. However it can be summarised that businesses wish to locate in the capital as a result of London’s central global position, its openness to trade, its connectivity and links to international markets, and its competitiveness as a business environment.
- 5.10.2 Figure 5.28 shows the expected size of major global economies in 2050 together with expected average annual GDP growth

**Figure 5.28: Expected size of major global economies in 2050 together with expected average annual GDP growth.**



PWC

- 5.10.3 Not only does globalisation create trading opportunities, it exposes London’s businesses to international competition forcing them to be productive and competitive which in turn helps to drive economic growth. As developing countries become wealthier, new trading opportunities will emerge for London’s businesses to exploit.
- 5.10.4 While emerging economies will present new opportunities for London’s businesses, developed economies in Europe, Asia and the USA are expected to remain the capital’s key trading partners. In 2014/15, the Europe and the USA accounted for 84.9 per cent of total inward investment projects to London (an increase of just 0.4 percentage points over the 2010/11

financial year)<sup>123</sup>.

- 5.10.5 London’s global competitiveness is underpinned by the location and capacity of its airports. There are 6 main airports serving London, Heathrow, Gatwick, the City, Stansted, Luton and Southend. Airports in themselves are significant catalysts for growth. They are worth £21bn to the UK’s economy each year with 40 per cent of our country’s imports and exports. Through their multiplier effects they facilitate direct and indirect employment, making an important contribution to their local economies, being major employers in their own right and attracting companies whose business depends on air travel into their immediate proximity, as well as through their wider supply chains. Their connectivity and accessibility through their supporting physical infrastructure also facilitates greater business opportunities to the wider UK economy, spreading their multiplier effects further as well as supporting the tourism industry. Through their economic potential, airports also unlock further growth creating demand for additional housing.
- 5.10.6 London and New York are typically identified as the dominant global financial services centres. However, cities like Singapore, Hong Kong and Tokyo have similar aspirations. At the same time, rapid economic growth in China over the past three decades has led to Shanghai, Shenzhen and Beijing becoming important financial centres. Following the vote to leave the European Union and the uncertainty over the terms of the UK’s departure, there is the threat that London maybe overtaken by Paris, Frankfurt or another city as the major financial services hub within Europe.

#### London’s Productivity

- 5.10.7 London’s total economic output in 2014 (measured as Gross Value Added) was £364 billion, comprising 22.5 per cent of the UK’s total economic output, an increase of 6.8 per cent on the previous year<sup>124</sup>. If London were an economy in its own right, it would be the eighth largest economy in Europe. London’s economy has grown on average by 2.4 per cent per annum in real terms between 2006 and 2014<sup>125</sup>.
- 5.10.8 Labour productivity as measured by GVA per worker is considerably higher in London than the UK average (36.8 per cent higher)<sup>126</sup>. However, in real terms, since 2014 employment has grown much more strongly than output growth, resulting in a productivity decline / stagnation. This contrasts strongly with recoveries from previous UK recessions which have been characterised with strong productivity growth and has caused concern about the nature of the employment growth since.
- 5.10.9 There are two schools of thought on what has become known as the ‘productivity puzzle’, firstly that the lack of productivity is cyclical i.e. short term, reflecting lower utilisation of employees due to weak demand conditions and is therefore likely to be temporary in nature. The second hypothesis is that more persistent factors are at work affecting the capacity of the economy to supply goods and services. Investment in the physical capital stock was subdued in the aftermath of the economic crisis, which may have encouraged businesses to switch to more labour-intensive forms of production. No clear resolution poses a dilemma for forecasters

<sup>123</sup> GLA Economics (2016) Economic Evidence Base, Chapter 1

<sup>124</sup> These figures on GVA are from the Regional Accounts published by the ONS and are in nominal terms, i.e. no changes have been made to account for the effects of inflation

<sup>125</sup> GLA Economics (2016) London in comparison with other global cities”, GLA Economics Current Issues Note 48, August 2016

<sup>126</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 1

in deciding whether this is a short term cyclical trend and should be deemed a temporary or whether it is more permanent phenomenon.

### Potential loss of agglomeration benefits

- 5.10.10 The agglomeration benefits of being based in London are a key feature of its success. Proximity to other firms and access to deep labour markets helps to reduce transaction costs, fosters collaboration and competition, and supports the development of formal and informal networks. This in turn leads to knowledge spillovers, higher productivity and growth<sup>127</sup>. Agglomeration has led to a large clustering of economic activity, particularly in the area of the Central Activities Zone and the northern part of the Isle of Dogs. It is calculated that the output of the Central Activities Zone, northern part of the Isle of Dogs and a 1km fringe around them stood at just over £188 billion in 2014, accounting for nearly 52 per cent of London's output and just under 12 per cent of UK output from an area of land covering just 0.03 per cent of the UK<sup>128</sup>.
- 5.10.11 Agglomeration also has its costs / dis-benefits. A growing concentration of businesses and people raises demand for resources which in turn raises prices in these markets. Moreover, population growth places additional demands on local services and transport which may increase the costs and/or affect the quality of service provision. These costs associated with higher densities are considered the diseconomies of agglomeration or congestion costs.
- 5.10.12 Businesses make informed decisions about whether the benefits of operating in London (e.g. higher profits) outweigh the costs (e.g. higher rents). Similarly, workers make decisions about whether the benefits of working in London (e.g. higher wages or better career opportunities) are sufficient to compensate for the costs (e.g. higher cost of living or longer commuter journeys). Some lower paid sectors such as health and social care sectors are particularly experiencing the impact of these costs, the impacts of which are presenting themselves in terms of high job vacancy rates<sup>129</sup>.
- 5.10.13 The degree to which London's competitiveness is eroded by rising costs and/or the deterioration of the quality of life of its citizens depends to a large extent on London's capacity to accommodate additional growth. Given London's continued strong growth it would appear that, on aggregate, the agglomeration benefits continue to outweigh the costs – as London's business base continues to grow. However, it is questionable how long this trend is likely to continue.
- 5.10.14 There is also an issue with regard to the impact of rising costs of business space for some business sectors (notably the artistic and cultural sectors), small and medium-sized enterprises and new business start-ups. Cost pressures are known to be highest in and around central London reflecting strong demand relative to supply and the intense competition for space with other uses including residential.

<sup>127</sup> GLA Economics, September 2014, 'Growing Together II: London and the UK economy

<sup>128</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 2

<sup>129</sup> GLA Economics (2016), Economic Evidence Base 2016, Chapter 6

### Increased pressure on London's infrastructure as a result of growth and increased economic activity

- 5.10.15 With the significant growth predicted in population and workforce over the next 20 years, London's infrastructure will come under increasing pressure. Whilst transport infrastructure is perhaps the most commonly cited area of concern, increases in capacity of energy, waste, and water will also be needed to ensure growth is sustainable. Broadband is also increasingly viewed by businesses and residents as an essential utility<sup>130</sup>.
- 5.10.16 The transport network plays a key role in maintaining London's economic competitiveness and is a significant driver of growth. Employment growth in central London place significant pressure on the public transport network, in particular tube and rail. A million additional daytime public transport trips are expected by 2041 to/from/within central London. Eight in ten arrivals to central London in the morning peak are by rail, underground or DLR. While funded rail and underground investment will increase capacity on the Underground and National Rail networks, demand is increasing faster than supply and by 2041 the crowded passenger experience is expected to increase by 60 per cent on London Underground and 150 per cent on National Rail Even with the planned network improvements<sup>131</sup>.
- 5.10.17 London's Victorian sewerage and water supply network is struggling to cope with the demands being placed on it. Thames Water forecasts that, without significant new investment, demand for water will exceed supply by 10 per cent in London by 2025, rising to 21 per cent by 2040. This will mean a potential deficit of over half a billion litres of water a day by 2050. London's combined sewer system, built over 150 years ago, was designed for a smaller, more permeable city. The challenges of London's growing population, changing land uses and changing climate mean that London is outgrowing its drains and sewers. This in turn is a contributing factor towards the increasing the risk of flooding<sup>132</sup>. See section 5.18 for more detail.
- 5.10.18 As London grows, there will also be increasing demand for energy. By 2050, the scale of population and economic growth expected in London will mean an estimated 20 per cent increase in overall energy demand<sup>133</sup>. Extra capacity will particularly be required around the Opportunity Areas where significant numbers of new homes and jobs are planned.

### Lack of high speed and efficient digital connectivity

- 5.10.19 Reliable, high quality, fixed and mobile broadband connections are essential to most modern businesses and especially for digital tech and creative companies. High speed internet enables businesses to create new and more efficient business processes, opens up new markets, and supports more flexible working. In future years, demand for high speed connections is likely to grow as firms and households need to transfer ever greater volumes of data.
- 5.10.20 Ofcom's Infrastructure Report 2014 found that the average download speed for the UK was 23mbps, although speeds available to customers vary considerably. Superfast broadband – speeds greater than 24 mbps – is now available in 75 per cent of UK premises, with take-up of 21 per cent. In London, average speeds were 27.3mbps, the highest of all UK regions.

<sup>130</sup> GLA Economics (2016), Economic Evidence Base, Chapter 6

<sup>131</sup> Mayor of London (2014) London Infrastructure Plan 2050, GLA

<sup>132</sup> Ibid

<sup>133</sup> Ibid

5.10.21 For London to be internationally competitive, the Government has set out its ambition of connecting the UK to 'Ultrafast' broadband of 100Mbps. In general, London provides good access to high speed broadband. Ofcom postcode data indicates that around 89 per cent of London is able to opt for Superfast Broadband (24Mbps or above). However gaps in provision are more acute in certain parts of London. A House of Commons research note, based on Ofcom data, showed that only 32 per cent of properties in the City of London and Westminster constituencies have access to Superfast broadband. Around 6500 properties can only access speeds of 2Mbps or less – not enough to run BBC iplayer<sup>134</sup>.

#### Loss of employment land - Insufficient amount of floorspace available to meet identified needs

5.10.22 Employment land in many London boroughs is under significant pressure for redevelopment due to the higher values that can be achieved through residential development. Typically residential land values are three to seven times higher than industrial land values<sup>135</sup> and residential values typically exceed offices in most parts of London.

5.10.23 In the London Business Survey, 32 per cent of business units identified the supply of commercial premises as having a negative or very negative impact on their business<sup>136</sup>. It is therefore vital that London has a ready supply of different types of sites and premises to accommodate business growth.

5.10.24 The availability and cost of affordable and grow-on workspace for start-ups and small businesses is a concern in both inner and outer London boroughs. This is particularly the case for office-based services where employment growth is projected to be strongest in the long-term, but also for specialist workspace such as the life science sector, where London has the potential to be world-leading. Research conducted for the London Enterprise Panel in 2015 found there to be 132 incubator, accelerator and co-working spaces in London, accommodating upwards of 3,800 SMEs on a given working day. Over two-thirds offered office space, around a quarter offered workshop space, and less than ten provided laboratory space. Provision is concentrated in the CAZ and CAZ fringe boroughs<sup>137</sup>.

5.10.25 Peter Brett Consultants estimate there will be 575,000 new office-based jobs in London over the period 2011–2036<sup>138</sup>. Some of this growth can be accommodated by occupiers making more efficient use of space but a considerable quantum of new office space will be required. The current London Plan estimates demand for an additional 3.9 million square metres (net) of office floorspace to 2031 but the requirement could be as high as 7.5 million square metres depending on the underlying assumptions used regarding the scale of employment growth and occupation densities. Much of the growth is being driven by the professional, scientific and technology sectors.

5.10.26 Central London still provides the most demand for office space with most of the growth (2000–2012) having been in the City of London and Tower Hamlets; these two boroughs accounted for almost two-thirds of the increase over this period, adding 1.9 million square metres between them – or 160,000 square metres each year. Together with Westminster, these

<sup>134</sup> Mayor of London (2014), London Infrastructure Plan 2050, Connectivity Paper, GLA

<sup>135</sup> AECOM Industrial Land Supply and Economy Study 2015, published GLA March 2016

<sup>136</sup> GLA Economics, November 2014, 'London Business Survey 2014: Main findings'

<sup>137</sup> URS, 2015, 'Supporting Places of Work: Incubators, Accelerators and Co-Working Spaces'

<sup>138</sup> Peter Brett Associates, (2014), London Office Panel Review, GLA4

boroughs account for almost half of the office floorspace across London (12.8 million square metres)<sup>139</sup>.

5.10.27 In outer London the total stock of office space has remained relatively static over the period 2000–2012, declining by 101,000 square metres or 8,400 square metres per year, to 5.7 million square metres by 2012<sup>140</sup>.

5.10.28 Previous editions of the London Plan have acknowledged that beyond the central London office market areas there has been a surplus of dated office space. The release of this in appropriate locations was managed through the planning system. However since the introduction of permitted development rights to change offices to residential has resulted in the potential loss of over 1 million sqm of office space in outer London and almost 0.5 million sqm in inner London of which, 56 per cent is either occupied or part occupied<sup>141</sup>. If trends continue, this may pose a particular threat to small occupiers. Recent research (Ramidus, 2015) estimates that there are about 90,000 small office occupiers in the CAZ in units less than 500 sqm, of which over 80 per cent are in units of less than 100 sqm.

5.10.29 New office hubs are emerging in London including King's Cross, South Bank and Stratford and there is some evidence of renewed interest in Croydon. Old Oak presents a long-term office development opportunity capitalising on the Crossrail/HS2 interchange. However, according to the most recent London Employment Sites Database (LESD), the longer-term employment projections by GLA Economics now exceed the currently identified employment capacity. In previous iterations of the LESD, capacity has always exceeded the projections. The reverse is thought to be due to a combination of the employment projections being revised upwards following strong recent employment growth and the supply of employment space in London coming under increasing pressure from higher value residential development<sup>142</sup>.

5.10.30 London's industrial estates also provide a valuable source of land for a wide range of different employment sectors. In 2015 there was an estimated 6,976 hectares of industrial land in London of which 4,553ha is of core industrial use (65 per cent), 1,877ha is of wider industrial uses (27 per cent) and 547ha is vacant land (8 per cent of total industrial land or 11 per cent of core industrial uses). Of this, outer London contained approximately 5,296ha or 76 per cent of the total, of which 68 per cent is in use for core industrial activities. Recent data suggests that London is losing almost three times the amount of industrial land compared to the benchmarks set out in the London Plan and GLA Land for Industry and Transport SPG. Between 2010 and 2015, a total of 525ha of industrial land was transferred to other uses or 105ha per annum compared with the London Plan/SPG recommended rate of release of 36.6ha per annum. A further 830ha of industrial land is in the pipeline for release, suggesting that if the current rate of release continues, the SPG target will be reached by around 2017 and exceeded significantly by 2031<sup>143</sup>.

5.10.31 The stock of vacant industrial land has also been decreasing over the past decade or more, from 16 per cent of core industrial uses in 2001 falling to 12 per cent in 2010 and 11 per cent in 2015. At the London-wide level this is higher than the average frictional vacancy rate of 5 per cent suggested in the SPG (for movement within the stock), if vacant sites in the

<sup>139</sup> VOA 2012

<sup>140</sup> VOA 2012, using current London Plan definition of outer London

<sup>141</sup> London Development Database (includes data provided by the boroughs as at 6/6/2016)

<sup>142</sup> GLA Economics (2016) Economic Evidence Base, Chapter 6

<sup>143</sup> AECOM Industrial Land Supply and Economy Study 2015, published GLA March 2016

development pipeline (approvals) are excluded. There are however several London boroughs, mostly in central, west and south London which are at or below the 5 per cent frictional vacancy rate<sup>144</sup>.

- 5.10.32 The loss of employment land in London's industrial estates is seen as a significant risk by some, however analysis suggests that there could be an emerging pattern of industrial sectors that are more sensitive to London locations tending to remain or grow in London (eg logistics, food, construction, waste, motor vehicle servicing and repair), and other sectors that are less sensitive to location tending to leave London (manufacturing, chemicals and metals). This suggests that overall there may be potential for the South East region to (continue to) accommodate some overspill demand from London or that demand may also transfer outside of London as its supply in London contracts. However, once this industrial land is redeveloped, if demand for these uses within London increases again, it may be very difficult to accommodate them and particularly those uses that cannot be mixed with residential (for operational/amenity reasons) and/or have large site area requirements<sup>145</sup>.
- 5.10.33 Understanding the changing relationship between economic output, jobs growth and land required to support different economic activities is fundamental to ensure that appropriate levels of employment land is available for different sectors to support the proper functioning of the city. With such intensive competition for land in London, it will be imperative that the London Plan understands and plans for this and monitors how this changing balance between employment land and housing affects London's economic competitiveness.

### Town centres

- 5.10.34 London's town centres provide people with access to a range of goods and services, complementing the role of the Central Activity Zone and contributing to London's economic competitiveness. According to forecasts by Experian produced in 2013<sup>146</sup>, London will need an additional 0.9 million sqm of comparison goods retail space by 2036, along with qualitative improvements to existing outmoded retail floorspace. However, there are spatial differences in these requirements with a significant number of District town centres in outer London boroughs estimated to require less retail floorspace than they currently have. The London Plan also identifies town centres as key areas for more intensive provision of housing and it is likely that the new London Plan will put even greater emphasis on these areas in the future. For those town centres that will see a contraction in retail floorspace requirements, it will be important that the release of retail uses is managed proactively so that these centres can diversify and still function in a coherent manner by having a more focused retail core but allowing the secondary and tertiary streets to become more mixed. This should enable these centres to develop alternative functions and attractions which complement the offers of the other town centres.
- 5.10.35 The evening and night time economy is a key driver of the economic and cultural regeneration of town centres. It generates jobs and improves incomes from leisure and tourism activities, contributing not just to the vitality of the town centre but also making it safer by increasing activity and providing 'passive-surveillance'. However, it can also be associated with noise,

<sup>144</sup> Ibid


<sup>145</sup> Ibid

<sup>146</sup> These forecasts are currently being updated to inform the next London Plan

crime, anti-social behaviour, community safety problems and detrimental effects on public health, which, without appropriate management and mitigation, impacts on the quality of life of local residents, workers and customers. Large concentrations of late night uses may also mean places lack vitality during the day.

- 5.10.36 In 2013-14, around 1,100 premises held a 24-hour licence in London. Almost 40 per cent of these were in five boroughs – City of London, Westminster, Islington, Lambeth and Haringey<sup>147</sup>.
- 5.10.37 The opening of the night tube in August 2016 is also expected to have a significant positive impact on the night time economy with suggestions that it could add £77m per year to the value to London's night time economy and significantly improving London's global economic competitiveness.

<sup>147</sup> London Datastore, Number of Premises Licences and Club Premises Certificates, December 2014

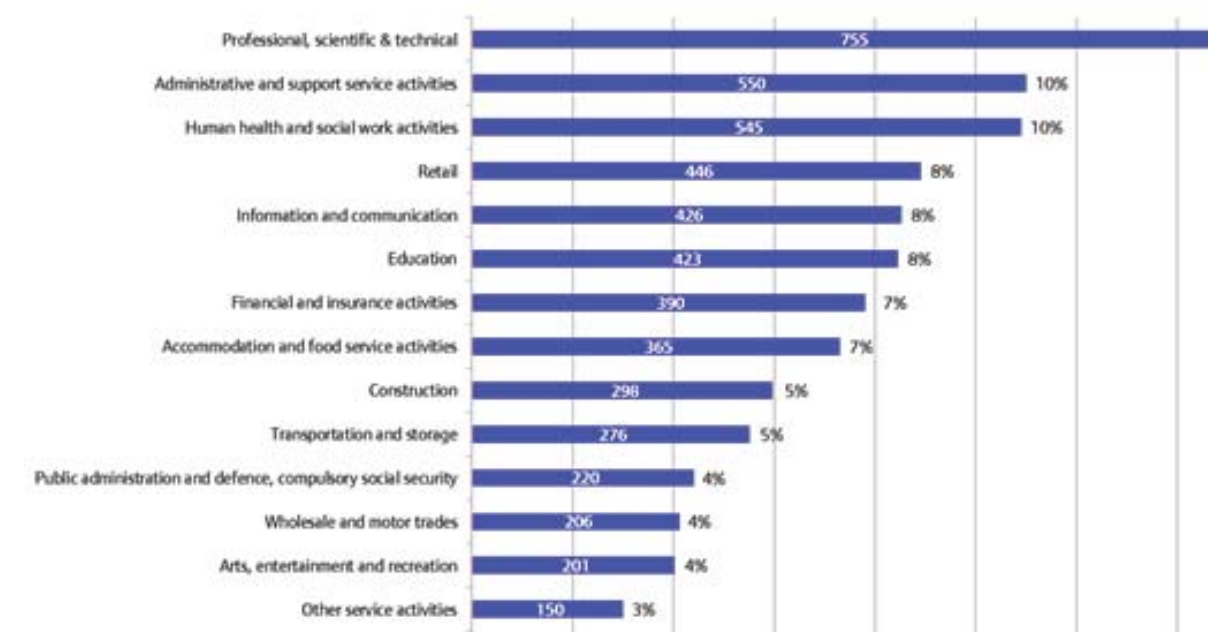
<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Changing global economy</li> <li>• London’s Productivity</li> <li>• Potential loss of agglomeration benefits</li> <li>• Increased pressure on London’s infrastructure as a result of growth and increased economic activity</li> <li>• Risk that infrastructure could constrain economic growth</li> <li>• Lack of high speed and efficient connectivity (digital) across all parts of London</li> <li>• Loss of employment land as a result of increased pressure for housing</li> <li>• Insufficient amount of floorspace available to meet identified needs</li> <li>• Affordability of business space, particularly for small and medium sized enterprises and start-ups</li> <li>• Impact of mixed use development – night-time economy and residents</li> <li>• Impact on town centres as a result of a reduction in demand for retail floorspace</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Potential to boost London’s economy, innovation and competitiveness, support existing businesses to expand and new business to start-up (particularly SMEs)</li> <li>• Opportunity to accommodate forecast growth in London’s employment</li> <li>• Opportunity to link land use planning and transport (including intensification of highly accessible locations including the CAZ and town centres)</li> <li>• Opportunity to link infrastructure providers with plans for development – forward planning</li> <li>• Opportunity to create more mixed use environments for business and residential (where this is possible in terms of business operational requirements and residents’ amenity)</li> <li>• Planners more aware of hot spots or areas deficient in supply of infrastructure</li> </ul>
<b>Implications of the plans and programmes review</b>	The importance of London’s position as a leading global city and to support a strong, diverse and resilient economic structure providing opportunities for all.
	
<b>Suggested IIA Objectives</b>	To maintain and strengthen London’s position as a leading connected knowledge based global city and to support a strong, diverse and resilient economy, providing opportunities for all

## 5.11 Employment

### The operation of London’s labour market

- 5.11.1 In 2016 London had a total of 5.7 million workforce jobs; this is projected to grow to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041 – equivalent to over 46,000 net additional jobs per annum.<sup>148</sup>
- 5.11.2 The CAZ covers London’s geographic, economic and administrative core and brings together the largest concentration of London’s financial and globally-oriented business services. Almost a third of all London jobs are based there and, together with Canary Wharf, it has historically experienced the highest rate of employment growth in London. Employment in the CAZ and Isle of Dogs is expected to grow substantially. By 2041, 1.4 million jobs are expected in the City of London and Westminster alone with a further 1.4 million spread across the remainder of the central sub-region (Camden, Islington, Kensington & Chelsea, Lambeth and Southwark). Tower Hamlets – containing Canary Wharf and the Isle of Dogs – will contain c174,000 jobs growth 2015 to 2041 and new employment centres are expected to emerge in the east of London, notably at Stratford.<sup>149</sup>
- 5.11.3 Outer London also contains significant levels of employment, for example Hillingdon, with more than 200,000 workforce jobs in 2015, and Hounslow, Barnet, Ealing, Croydon, Brent, Enfield and Bromley all with more than 100,000. Much of this employment is focused in town centres/retail parks, business parks, industrial locations and in health/educational activities. There was 2.1 million jobs in outer London boroughs in 2016 compared to 3.4 million in inner London. By 2041 this is expected to grow to 2.5 million and 4.2 million respectively – 14% and 19% increase.<sup>150</sup>

**Figure 5.29: Jobs in London in 2015 by sector and proportion of the London total**



Workforce jobs, ONS

<sup>148</sup> Labour Market Update for London – December 2016

<sup>149</sup> GLA Economics (2016) Economic Evidence Base, Chapter 8

<sup>150</sup> Labour Market Update for London – December 2016

- 5.11.4 Figure 5.29 shows the total number of jobs in London by sector in 2015 and the proportion of total jobs each sector accounts for – demonstrating the diversity of London’s economy. Professional, scientific and technical activities is the largest sector of employment, accounting for 755,000 jobs (13.6 per cent of the London total). Despite some perceptions that London’s economy is dominated by Financial services, the sector only accounts for around 390,000 (7 per cent) of the London total. Indeed, other sectors like Health, Education and Retail all account for a higher proportion of London’s jobs and tend to be more spatially spread than jobs in some of London’s other service sectors.
- 5.11.5 Other distinct clusters of sectors by employment can be seen within London with Financial and insurance activities, and Professional, scientific and technical activities being of importance in Inner London; while employment in the Transportation and communication sector is generally more significant in Outer London.
- 5.11.6 London’s employment profile has changed over the past 15 years. Manufacturing has been declining and jobs in professional services, health and education have been increasing. Overall there has been a loss of comparatively lower density employment and an increase in comparatively higher density employment uses. These sectoral trends are expected to continue with manufacturing and wholesale jobs forecast to decline by 41 per cent and 20 per cent respectively by 2041 (compared to 2015) while professional services jobs are forecast to increase by almost 50 per cent. Strong growth is also anticipated in information / communication (39 per cent), education (37 per cent), arts, entertainment and recreation (35 per cent), health (27 per cent), administrative / support services (26 per cent), accommodation and food services (25 per cent) and construction (23 per cent)<sup>151</sup>.

#### Disparities between rates of employment among London’s residents

- 5.11.7 In 2015 London had a marginally lower employment rate (72.9 per cent) than the national average (73.5 per cent), but this disguises significant variation between groups. Some groups such as parents, particularly mothers, and young people having significantly lower employment rates in London than the rest of the UK - 59.9 per cent parents in London compared to 68.8 per cent nationally and 47.1 per cent young people in London under 25 compared to 53.5 per cent nationally<sup>152</sup>.
- 5.11.8 A greater proportion of men were in full-time work 87.2 per cent of all male workers compared to 66.5 per cent of all women workers<sup>153</sup>.
- 5.11.9 Employment rates for disabled people and BAME groups in London are marginally higher than rates for the same groups in other parts of the country in 2015, 50.1 per cent in London compared to 49.2 per cent in UK for disable people and 64.9 per cent for London compared to 62.9 per cent for UK for BAME groups<sup>154</sup>.
- 5.11.10 There were 283,000 unemployed adults in London in 2015, which is down from a peak of 405,900 in 2011. This brought the unemployment rate down to 6.1 per cent in 2015; however this is somewhat higher than the national rate of 5.3 per cent. The unemployment rate was higher in inner London than outer London in 2015 with 6.4 per cent and 5.9 per cent

<sup>151</sup> GLA Intelligence Unit, Long term labour market projection, June 2016

<sup>152</sup> ONS Labour Force Survey

<sup>153</sup> GLA Economics (2016) Economic Evidence Base, Chapter 9

<sup>154</sup> Ibid

respectively<sup>155</sup>.

- 5.11.11 The unemployment rate for people with ethnic minority backgrounds was slightly lower in London (9.2 per cent) than the national level (9.5 per cent), but higher for disabled people, 10.5 per cent nationally compared to 11.6 per cent in London. Across London, Barking and Dagenham had the highest unemployment rate of 10.4 per cent in the year to June 2015, but this has been steadily falling from a peak of 14.8 per cent in 2012-2013. Richmond upon Thames had the lowest unemployment at a steady 4.6 per cent<sup>156</sup>.
- 5.11.12 Nationally 44.3 per cent of working age disabled people were economically inactive; which is nearly 4 times higher than for non-disabled people (11.5 per cent)<sup>157</sup>. Disabled people are more likely to be unemployed than non-disabled people. In March 2013, the unemployment rate for disabled people stood at 12 per cent, compared to 7.6 per cent of non-disabled people<sup>158</sup>. However the employment rate gap between disabled and non-disabled people had narrowed from 37.2 per cent in 2006 to 32.8 per cent in 2013<sup>159</sup>. Studies show that the two most common barriers to accessing work amongst adults with impairments were a lack of job opportunities and difficulties with transport.
- 5.11.13 In 2015, self-employment accounted for 18.1 per cent of total jobs in London (equivalent to around one in every seven jobs). In London since the recession in 2008, self-employment increased by around 32 per cent, which is higher than the average growth of 22 per cent in the UK as a whole<sup>160</sup>.
- 5.11.14 The number of people in part-time work in London has risen since the recession, from 20 per cent in 2008 to 22 per cent in 2015, but it is still below the UK average of 25 per cent. For males, in part-time employment in London, this figure is 12 per cent of total male employment in line with the UK average. For females in part-time employment in London, this figure is much higher at around 33 per cent of total female employment; however this is lower than the UK average at 41 per cent. As a result, women in London hold 66 per cent of part-time jobs in London, compared to 70 per cent in the UK as a whole.
- 5.11.15 Analysis from GLA Economics suggests that women may appear to be ‘disadvantaged’ in comparison to men due to individual characteristics and factors which are peculiar to London, such as the significantly higher cost of childcare, transport and, more generally, the cost of living which can influence the opportunity cost of women working<sup>161</sup>.
- 5.11.16 The difference between under and over employment rates can provide an indication as to the efficiency of the labour market at meeting demands for working more and fewer hours. In London, the underemployment rate has exceeded the over employment rate in each year since 2009, peaking at 2.6 percentage points difference in 2013. Suggesting that there has recently

<sup>155</sup> Ibid

<sup>156</sup> Ibid

<sup>157</sup> Nomis, (2013), The Annual Population Survey March 2013, retrieved from NOMIS: [www.nomisweb.co.uk](http://www.nomisweb.co.uk) (Further information, please contact Nomis at: [support@nomisweb.co.uk](mailto:support@nomisweb.co.uk))

<sup>158</sup> Ibid

<sup>159</sup> Ibid

<sup>160</sup> GLA Economics (2016) Economic Evidence Base, Chapter 9

<sup>161</sup> GLA Economics (2015). Part-time employment in London, GLA Economics, Current Issues Note 42. Available at: <https://www.london.gov.uk/what-we-do/business-and-economy/business-and-economy-publications/cin-42-part-time-employment-london>

been net underemployment in London – there are more workers wanting more hours of work than less – which could be an indication of slack in the labour market. In contrast, there has been net over employment in 2014 and 2015 across the UK as a whole. An impact of net under employment is that individuals are not working to their full capacity<sup>162</sup>.

**Disparity between wages and cost of living, including take-up of London Living Wage**

5.11.17 In 2015, the average (median) gross hourly wage was £17.16 for full-time jobs and £9.60 for part-time jobs. However 20 per cent of the capital’s workforce was paid below the London Living Wage (£9.40 per hour in 2015) compared to 12.8 per cent in 2008. There are a number of factors that may explain this – the effect of jobs growth in low paid sectors, uplifts in the London Living Wage rate above actual increases in earnings, and more part-time working.

5.11.18 Low pay in London disproportionately affects younger workers and women. Nearly 50 per cent of workers aged 18 to 24 were paid less than the London living wage rate in 2015. 100,000 more women earned below this level of pay than men, 57 per cent of the total<sup>163</sup>.

**Figure 5.30: Proportion of jobs below London Living Wage**

Age group	Proportion of employee jobs below the living wage - Male	Proportion of employee jobs below the living wage - Female
18-24	48	48
25-34	17	19
35-44	11	19
45-54	10	18
55-64	13	19
65+	22	27

London data above from Annual Survey of Hours and Earnings (2014 - provisional), ONS

**Growth of low paid employment**

5.11.19 In 2015, 22 per cent of people in London are employed part-time. Since 2004, the number of part-time workers in London has grown by almost 30 per cent, compared with 17 per cent growth for full-time workers.

5.11.20 GLA Economics research found that on a pro-rotta basis part time employees are much more likely to be low-paid than full-time employees<sup>164</sup>. Moreover over 50 per cent of part-time male workers earn less per hour than the London Living Wage. Since 1997, 40-50 per cent

<sup>162</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 9

<sup>163</sup> Ibid

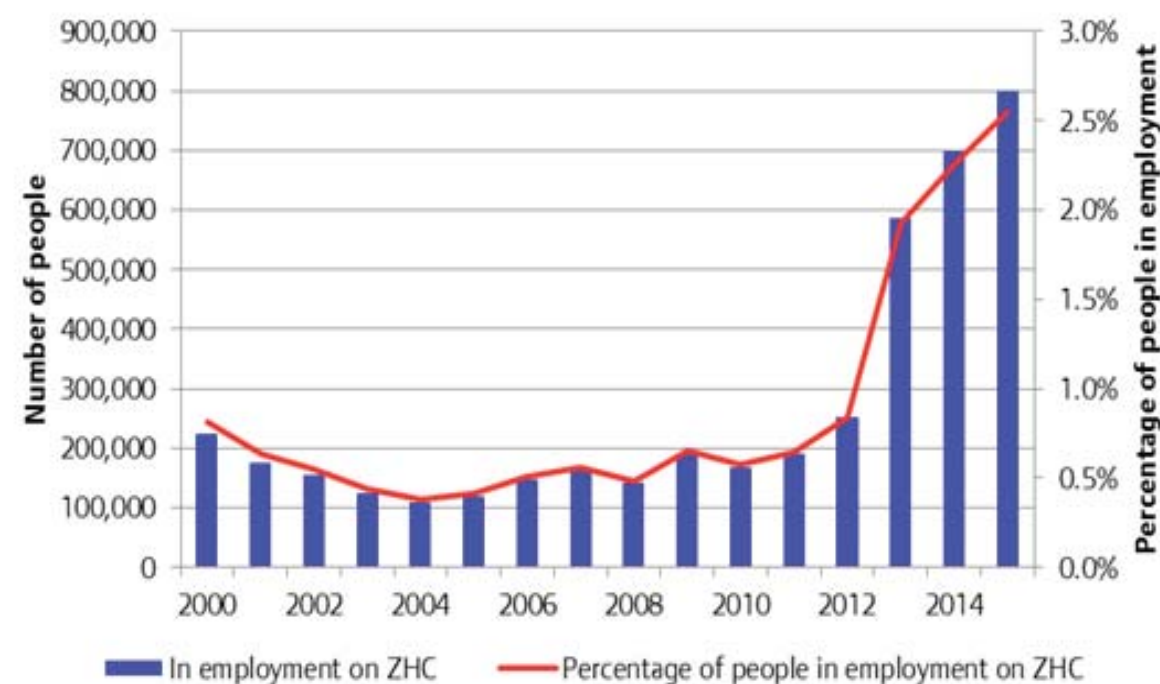
<sup>164</sup> Hoffman, J., February 2014, ‘Working Paper 59: Low pay in London’. GLA Economics - low pay as defined by being ‘hourly pay excluding overtime below the 20th percentile point in the pay distribution for all London employees’

of employees in the social care sector are considered to be in low pay, 50-60 per cent for the retail sector, 60-70 per cent for the hospitality and catering sector and 75-85 per cent for the cleaning sector. Moreover in three of four of these ‘low pay’ sectors, the proportion of ‘low paid’ employees was at a peak in 2012 suggesting that the difference between these sectors and the non-‘low pay’ sectors may be increasing and indeed the differences in median pay have increased<sup>165</sup>.

**Zero-Hours Contracts**

5.11.21 Zero hour contract also has an influence of the security of people’s employment. Figure 5.31 shows the growth in zero hour contracts in London.

**Figure 5.31 Trends in Zero Hour Contracts**




ONS Labour Force Survey

5.11.22 Between October and December 2015, there were 801,000 people in employment on zero hours contracts. People on zero hours contracts are more likely to be female or in young or older age groups. Sector which are more prone to using zero hour contracts include Accommodation & Food, Health & Social Work, Elementary and Caring, Leisure & Other Service occupations<sup>166</sup>.

<sup>165</sup> Ibid

<sup>166</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 9



<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Disparities between rates of employment among London’s residents</li> <li>• Disparity between wages and cost of living</li> <li>• Lack of diversity in jobs provided</li> <li>• Growth of low paid employment and zero hours contract</li> </ul>
<b>Opportunities</b>	Provision of suitable employment space to meet different sectors requirements
<b>Implications of the plans and programmes review</b>	Employment growth in different sectors ensuring a diverse economy providing opportunities for all. Productivity puzzle.
	
<b>Suggested IIA Objectives</b>	<ul style="list-style-type: none"> <li>• To maintain and strengthen London’s position as a leading connected knowledge based global city and to support a strong, diverse and resilient economy, providing opportunities for all</li> <li>• To ensure the education and skills provision meets the needs of London’s existing and future labour market and improves life chances for all</li> </ul>

## 5.12 Education and Skills

The education system and educational and vocational attainment

### Increasing demand for school places to meet growing needs

5.12.1 London’s school-age population is growing and is projected to reach nearly 1.4 million by 2041, up from 1.2 million in 2014. This will place increased pressure on school places. In January 2015, there were a total of 3,119 schools in London. Of these, 1,800 were state-funded primary schools and 479 were state-funded secondary schools. London had 555 independent schools (fee paying private schools); the highest in any region. Between 2014/5 and 2024/5, demand for state funded primary school places is projected to increase by between 60-67,000 pupils, however the pressure is predicted to be most severe at secondary school level, where an additional 105-122,000 pupils are predicted in that same period. Over 600 new schools and colleges will be needed in the years up to 2050 to meet this growing demand<sup>167</sup>.

### Expensive and insufficient childcare provision

5.12.2 The number of pre-school age children (0-4 years) in London has also increased by over 100,000 since 2001. The numbers are now projected to stay around this level (approximately 620,000) for the next 25 years with higher numbers of this age group in outer London boroughs such as Newham (28,000), Enfield (25,000) and Waltham Forest (22,000). The Family and Childcare Trust reports that childcare in London for under 2’s is 34 per cent more expensive than childcare in the rest of England. Although there are legal requirements for councils to meet childcare needs of local constituents, a recent survey conducted by the Family and Childcare Trust found that 17 local authorities in London did not have enough free early education places. The relatively high cost of childcare as well as lack of availability in some areas, significantly impacts on parents returning to work after having children, particularly mothers<sup>168</sup>.

### Large spatial variations in educational performance across London

5.12.3 London is home to more than 40 universities and specialist higher education (HE) institutions. London’s universities make a significant contribution to its economy and labour market. HESA records show that around 370,000 students studied at a London Higher Education institution in 2014/15 (16 per cent of all UK students).

5.12.4 Data from London Higher found that over 100,000 overseas students study in London, comprising 28 per cent of all students in the capital; with 24 per cent of all overseas students in the UK study in the capital. With the cost of living so high in London it is important that adequate provision of student accommodation is made to reflect students needs across London. The London Plan estimates that there could be a requirement for some 20,000 – 31,000 places between 2015 to 2025.

5.12.5 Data from six months after graduation for the 2012/2013 cohort highlights the dominance of London as a graduate employer with 35.6 per cent of graduates in London neither lived nor

<sup>167</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 8

<sup>168</sup> Family and Childcare Trust, ‘Childcare Costs Survey 2015’

studied in the area previously, higher than in any other UK region. Almost 85 per cent of these had professional and managerial jobs.<sup>169</sup>

**Higher Education**

- 5.12.6 London is home to more than 40 universities and specialist higher education (HE) institutions. London’s universities make a significant contribution to its economy and labour market. HESA records show that around 370,000 students studied at a London Higher Education institution in 2014/15 (16 per cent of all UK students).
- 5.12.7 Data from London Higher found that over 100,000 overseas students study in London, comprising 28 per cent of all students in the capital; with 24 per cent of all overseas students in the UK study in the capital.
- 5.12.8 With the cost of living so high in London it is important that adequate provision of student accommodation is made to reflect students needs across London. The London Plan estimates that there could be a requirement for some 20,000 – 31,000 places between 2015 to 2025.
- 5.12.9 Data from six months after graduation for the 2012/2013 cohort highlights the dominance of London as a graduate employer with 35.6 per cent of graduates in London neither lived nor studied in the area previously, higher than in any other UK region. Almost 85 per cent of these had professional and managerial jobs<sup>170</sup>.

**Londoners struggle with the transition from education to work**

- 5.12.10 Whilst London attracts a significant number of graduates from elsewhere into the workplace, for Londoners themselves, the transition from education into the labour market for young people in London comes with its challenges, with a youth unemployment rate of 17.9 per cent for 16-24 year olds compared to the England average of 14.4 per cent<sup>171</sup>. There is a lack of support for transitions from education to work, especially for young women, and many young people therefore struggle with this.


**Business unable to access the right skills to meet their growth needs**

- 5.12.11 London has the most skilled professionals in the UK with over 57 per cent of Londoners possessing an NVQ level 4 or higher compared to 41.6 per cent of the rest of UK. Approximately three in every five (60.2 per cent) workers in London had tertiary education as their highest qualification in 2014. This is higher than many other global cities such as New York, Tokyo and Paris. A further 25.3 per cent of workers in London had upper secondary or post-secondary education which is the equivalent of GCSE grades A\*-C and A Levels. The remaining 14.6 per cent of London’s workforce had lower secondary school education (i.e. GCSE grades D-G) or less as their highest qualification. Only 4.6 per cent of Londoners have no qualifications compared to 5.1 per cent nationally<sup>172</sup>.
- 5.12.12 According to the London Business Survey, 70 per cent of businesses in London rate the capital highly as a place to do business in terms of the availability of skilled staff with only 5 per cent

<sup>169</sup> GLA Economics (2016) Economic Evidence Base, Chapter 8,  
<sup>170</sup> Ibid  
<sup>171</sup> GLA Economics (2016) Economic Evidence Base, Chapter 9  
<sup>172</sup> GLA Economics, 2016, ‘London in comparison with other global cities’.Current Issues Note.

of businesses rating the capital poorly on this<sup>173</sup>. However, despite these generally positive perceptions of London’s labour market, there is evidence of skills shortages, particularly at middle and high skill level occupations. In total, there are almost 223,000 cases where London employers considered existing staff not to be fully proficient in their roles (equivalent to 5 per cent of all those employed). As a proportion of all employment, these skills gaps are most prevalent in administrative/ clerical, sales and customer service, and elementary occupations with around half of affected employers experiencing loss of business to competition and/or delays in developing new products as a result<sup>174</sup>.

- 5.12.13 London has a higher proportion of workers born in EU countries than the rest of the UK<sup>175</sup>. London’s ability to attract skilled workers is an important factor in its success but some businesses are concerned that the supply of skilled labour is a potential constraint to future growth. Businesses have sought assurance on the status of current EU staff in London as there is a concern that stricter immigration controls limiting the free movement of labour from the EU, which seem likely given the Referendum outcome, may restrict the supply of labour to the London economy.

<b>Key issues</b>	Insufficient school places to meet growing needs Large variations in educational performance across London Lack of support for transitions from education to work, especially for young women Maintaining London’s status as an international city of learning, research and development
<b>Opportunities</b>	Promote London as centre for excellence in learning and research More co-ordinated approach to work with local authorities to ensure sufficient good quality school places in the right locations
<b>Implications of the plans and programme review</b>	The importance of ensuring a world class education system and that Londoners have the right skills to access a diverse range of jobs
	
<b>Suggested IIA Objectives</b>	To ensure the education and skills provision meets the needs of London’s existing and future labour market and improves life chances for all

<sup>173</sup> GLA Economics (2014) , ‘London Business Survey 2014’, London as a business location, Table: LBL1  
<sup>174</sup> UKCES Employer Skills Survey 2015, May 2015, table 72/1.  
<sup>175</sup> GLA Economics (2016) Economic Evidence Base 2016, Chapter 6

## 5.13 Culture

### London's culture and cultural tourism

- 5.13.1 London's culture sector and the creative industries deliver both economic and social benefits for the capital. As well as one of London's fastest growing sectors, culture also plays a role in bringing people together and generating civic pride.
- 5.13.2 In 2012, the GVA of the creative industries in London was estimated at £34.6 billion, accounting for just under half (47.6 per cent) of the UK total (£72.7 billion); the creative industries group contributed 10.7 per cent of total GVA in London London's creative industries specialise in music, performance and visual arts (75.8 per cent of total UK GVA generated in London), and Film, TV, video, radio and photography (66.4 per cent of total UK GVA generated in London)<sup>176</sup>.
- 5.13.3 The EU is the largest export market for the UK creative industries, totalling 56 per cent of all overseas trade in the sector<sup>177</sup>. The creation of the EU Digital Single Market is expected to contribute £3b to the economy and create 3.8m jobs. Since 2011, over 60 international cities have launched aggressive policy initiatives to increase their position as creative and cultural capitals<sup>178</sup>. It is unclear what impact leaving the EU will have on cultural and creative industries.
- 5.13.4 Culture is the reason 4 out of 5 visitors choose to visit the capital. 18.6m international and 12.9m domestic visitors visited London in 2015 making it a record breaking year at 31.5m visits. In 2013, GLA Economics estimated that cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London, just under a third of the overall contribution from the tourism sector as a whole. London's night-time economy - a key element of the London's culture - contributed £17.7bn to £26.3bn in Gross Value Added (GVA) to the UK economy in 2014<sup>179</sup>. The opening of the night tube in August 2016 is expected to increase the value of the night time economy significantly further with TfL suggesting c£77m per year.
- 5.13.5 In 2014, there were 795,800 jobs in the creative economy in London, equivalent to 16.3 per cent of total jobs in the capital (compared to 7.4 per cent of the total number of jobs in the rest of the UK)<sup>180</sup>. 80.2 per cent of the total number of jobs in the creative economy were filled by people from the White ethnicity group compared to 19.8 per cent of jobs filled by BAME groups<sup>181</sup>. London's unique and skilled creative workforce, however, is under threat as the rising costs of living are forcing talent out of London. The UK's exit from the European Union may also have a huge impact on London's ability to attract and retain the best international creative talent.
- 5.13.6 London has 857 art galleries, 241 theatres, 860 cinema screens, hosts 271 festivals or events, 10 major concert halls, 13 national museums, 339 night clubs, 320 live music venues, 4

<sup>176</sup> GLA Economics (October 2015), The Creative Industries in London

<sup>177</sup> <http://www.creativeindustriesfederation.com/news/david-cameron-meets-the-fed-as-members-vote-remain> (follow up with Eliza on origin of stat)

<sup>178</sup> Leo Hollis (2013) Cities are Good for You

<sup>179</sup> London's 24 Hour Economy, London First & EY

<sup>180</sup> GLA Economics (October 2015), The Creative Industries in London

<sup>181</sup> Ibid

UNESCO world heritage sites and 353 public libraries<sup>182</sup>. Many of London's cultural facilities and spaces are heritage assets. Culture plays a significant role in place-making with 84 per cent of Londoners thinking that the city's cultural scene plays an important role in ensuring a high quality of life. 75 per cent of Londoners are satisfied with the city's cultural offer and say that it is London's cultural offer that makes living in London 'worth it' despite big problems, like housing<sup>183</sup>.

- 5.13.7 However despite this positive general picture, London has low levels of participation in culture from resident Londoners - particularly with Londoners from low socio-economic backgrounds. London diverse population also experiences inequality in terms of access to cultural venues and activities and there is patchy levels of cultural provision across London's boroughs. BME groups were less likely to have visited a heritage site in the previous years compared with the white group (56 per cent compared to 75 per cent respectively), less likely to have engaged with the arts (68 per cent compared to 78 per cent respectively), and less likely to have visited a museum or gallery (43 per cent compared to 53 per cent respectively), but more likely to have visited a library (47 per cent compared to 33 per cent respectively)<sup>184</sup>. In 2010, 39 per cent of Londoners said they took part in culture at least weekly. This dropped to 23 per cent in 2016.
- 5.13.8 London's cultural infrastructure is also not sufficient to allow the industry to grow and thrive. It is losing essential spaces and venues for live cultural production and consumption including pubs, clubs, and music venues. Over 103 grassroots music venues have been lost in the last 8 years, pubs in London are closing at a rate of 10 per week<sup>185</sup> and it is set to lose 30 per cent of creative workspaces over the next 5 years<sup>186</sup>.
- 5.13.9 Red tape and licensing is also stifling London's creativity and cultural growth. Creative businesses and artists struggle to secure long term financing and business support as their activities are perceived to be 'risky' or of non-commercial value. A 2010 survey found that, nationally, 79 per cent of studio spaces were rented and 21 per cent owned. Many buildings were on short-term leases, with 64 per cent on leases of less than five years. In London these pressures are particularly severe with over 30 per cent of current London studios set to disappear within 5 years impacting some 3,500 artists<sup>187</sup>.
- 5.13.10 Funding for the arts has also undergone significant cuts over the past 5 years, particularly at the Local Authority level. On average, councils' spend on cultural services in London fell in real terms by 24 per cent between 2010/11 and 2013/14, while their investment in London-based NPOs fell by 23 per cent from 2010/11 to 2012/13<sup>188</sup>.
- 5.13.11 Arts Council England has already shifted funding outside the capital from 40 per cent to 20 per cent with a further 5 per cent expected by 2018<sup>189</sup>.

<sup>182</sup> BOP Consulting (2015), World Cities Culture Report

<sup>183</sup> GLA Intelligence, London Annual Survey, 2015

<sup>184</sup> Crossick & Kasznych, "CultureUnderstanding the Value of Arts and Culture", Arts & Humanities Research Council,


<sup>185</sup> Campaign for Real Ale, <http://www.camra.org.uk/home>

<sup>186</sup> Arts Council, (2016), Making Space: Developing and Sustaining Affordable Artists' Studios and Creative Workspaces,

<sup>187</sup> Ibid

<sup>188</sup> London local government's support for arts and culture, London Councils 2015

<sup>189</sup> Arts Council England

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Loss of pubs, cinemas, creative workspaces, live music and other cultural facilities and risk of harm to heritage assets</li> <li>• Increased appropriate production space needed for the creative industries to thrive and develop</li> <li>• Inequality in access to cultural venues</li> <li>• Low levels of participation</li> <li>• Red tape stifles creativity / talent development</li> <li>• Lack of community led engagement in planning and development schemes for local area</li> <li>• Despite the wide ranging economic and social benefits it brings, culture is a low priority on national and local development agendas.</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Development of a cultural infrastructure plan</li> <li>• Inclusion of agent of change principle to support cultural events</li> <li>• Support the Thames Estuary Production Corridor vision</li> <li>• Set up Creative Enterprise Zones</li> <li>• Promote and protect London’s libraries, community centres and art venues</li> <li>• Support London’s theatres, galleries, museums to open up access for all Londoners and to spread their activity and presence across the city</li> <li>• Appointment of the Night Czar to champion the night time economy</li> <li>• Support the aims of other relevant Mayoral strategies and programmes such as: <ul style="list-style-type: none"> <li>• Cultural Strategy</li> <li>• Skills or Londoners Strategy</li> <li>• Creative Industries investment programme for fashion, film games and design</li> </ul> </li> </ul>
<b>Implications of the plans and programme review</b>	The economic and social benefits of culture
	

<b>Suggested IIA Objectives</b>	<ul style="list-style-type: none"> <li>• Improve accessibility for all to cultural venues?</li> <li>• Improve participation by all in cultural activities and support cultural activities that promote social integration?</li> <li>• Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector Enable Londoners to develop skill and take up careers in the creative industries</li> <li>• Provide access to affordable cultural activities in areas of deprivation</li> </ul>
---------------------------------	---

## Environment

### 5.14 Air Quality

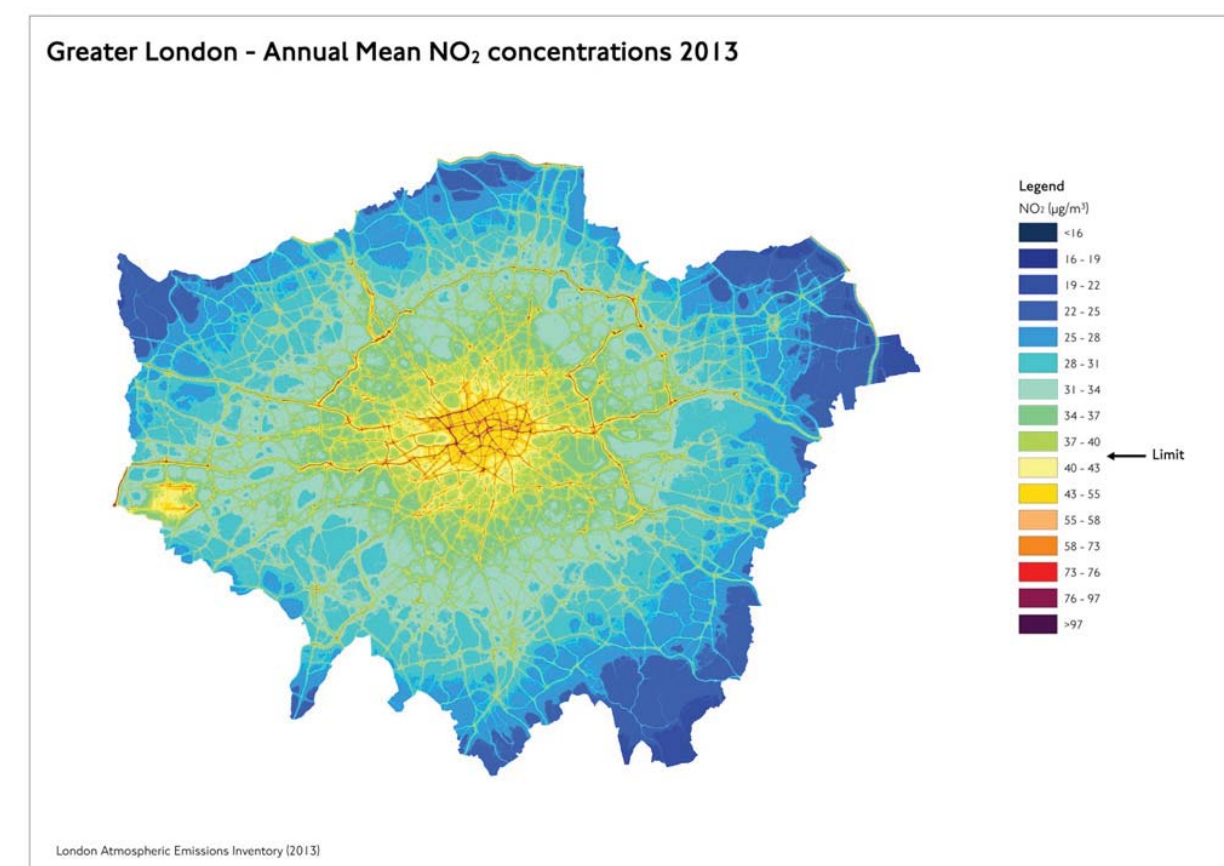
The condition of the air with respect to the presence (or absence) of pollutants in the air e.g. NO<sub>x</sub>, NO<sub>2</sub>, PM and the resulting impact this has on London's compliance with legal standards, public health and inequality.

- 5.14.1 Since the passage of the Clean Air Act in 1956 there has been significant progress made in improving air quality in the capital. Reductions in the levels of benzene, lead and sulphur dioxide pollution have greatly improved health and quality of life. London now meets eight of the nine legal limits set by the National Air Quality Regulations, underlining the ability of effective and coordinated action to improve the air quality. However despite this there are 33 Air Quality Management Areas (AQMA) across London, most designated for road transport pollutant emissions with 4 AQMAs designated for other transport and industrial emissions.
- 5.14.2 Scientific research has shown air pollution has a great impact on health. Lifelong exposure to current concentration of particulates in the air in London has been calculated to reduce average life expectancy by about 9 months (based on a child born in 2008). The London Health Commission states that 7 per cent of all adult deaths in London are attributable to air pollution. Mortality is not the only air pollution related health effects, in 2010 - London air pollution was associated with over 3,000 hospital admissions as well as increased sensitivity to allergens, pre-natal exposure linked to low birth weight and increased risks of chronic disease later in life. The latest health evidence suggests that the smaller particles and gases which are invisible to the human eye may be even more deadly with a wider range of health effects. Two pollutants remain a specific concern; particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>).
- 5.14.3 Exposure to particles even in the short term (days to months) causes increases in hospital admissions and premature deaths and increases in the number of GP visits.<sup>190</sup> It is estimated that in 2008 there were over 4,000 deaths brought forward attributable to long-term exposure to small particles. This amounts to between 6 and 9 per cent of all deaths.<sup>191</sup> Whilst London is meeting legal limits for particulate matter, as this pollutant is damaging to health at any level it is important to remain focused on reducing it.
- 5.14.4 In addition to the UK Air Quality Strategy Objectives and EU limit values, the World Health Organisation (WHO) has set a guideline value for PM<sub>2.5</sub> of 10µgm<sup>-3</sup> - although WHO does not set timeframes for when guidelines should be met. The 2014 Local Air Quality Network Summary Report reports that no sites achieved this WHO guidance value.

<sup>190</sup> Transport for London (2014), Transport Action Plan

<sup>191</sup> Ibid

Figure 5.32: Annual Mean NO<sub>2</sub> Concentration 2013



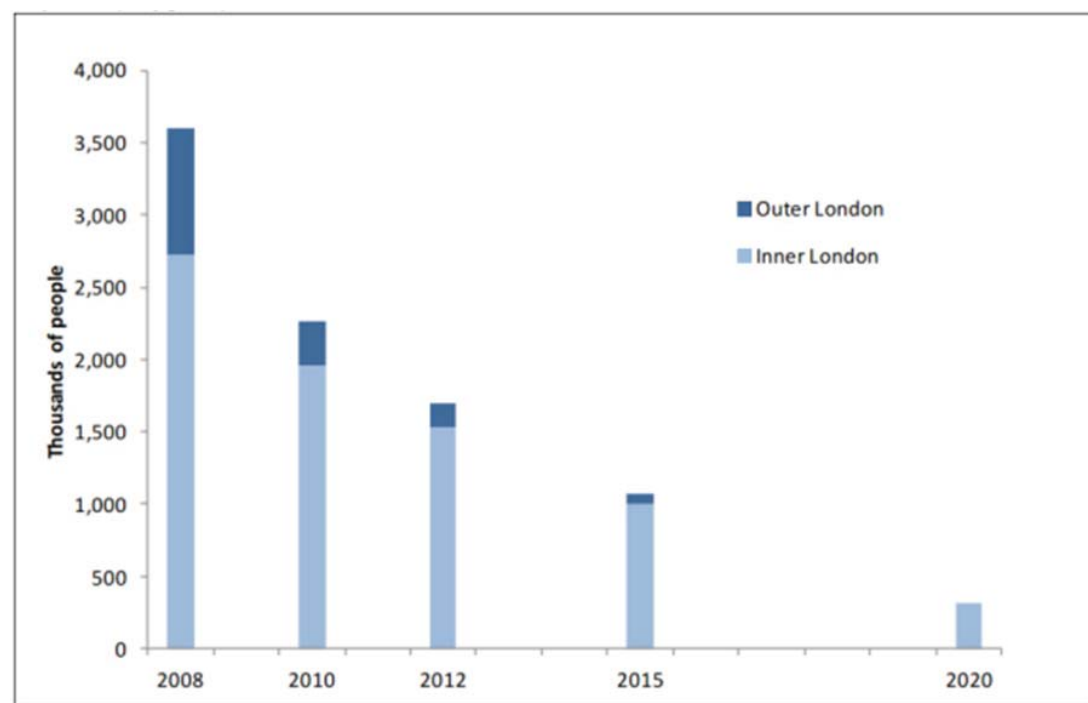
- 5.14.5 Figure 5.32 shows NO<sub>2</sub> levels concentrations across London. London, along with a large number of other UK and European cities, is exceeding the requirements of the Ambient Air Quality Directive 2008 for nitrogen dioxide (NO<sub>2</sub>). Any area in yellow, red or purple exceeds the legal standards - including in central and Inner London, on the major road network and at Heathrow Airport. In 2014, 39 out of 67 sites measured in London did not achieve the annual mean objective for NO<sub>2</sub> and 8 sites recorded an annual mean of twice the legal limit or above. 14 sites exceeded the hourly mean objective for NO<sub>2</sub>.<sup>192</sup>
- 5.14.6 The number of Londoners exposed has been declining, however it is estimated that in 2020 500,000 people will still be exposed to levels of NO<sub>2</sub> above the EU limit value. A more accurate estimate of the number of people projected to be exposed to level of NO<sub>2</sub> above the EU limit value in 2020 and beyond will be able to be determined after the London Atmospheric Emissions Inventory (LAEI) 2013 concentration data has been published. It is anticipated that these data will be available later in the year (2016/17).
- 5.14.7 Analysis undertaken GLA Economics shows populations living in the most deprived areas are on average currently more exposed to poor air quality than those in less deprived areas. 51 per cent of the Local Super Output Areas within the most deprived 10 per cent of London have concentrations above the NO<sub>2</sub> EU limit value. This is in contrast to the 10 per cent least

<sup>192</sup> Environmental Research Group and King's College London, 2016 - London Air Quality Network Summary Report

deprived areas, which are on average 1 per cent above the NO<sub>2</sub> limit value<sup>193</sup>. According to the GLA London Atmospheric Emissions Inventory exposure analysis 2013 there were 1,400,000 vulnerable people exposed to the health risks associated with exceeding the EU limits for NO<sub>2</sub>.

5.14.8 Those in deprived areas are also much more likely to have pre-existing cardio-respiratory diseases. Thus they are both more exposed and also more susceptible to poor air quality effects. Therefore, reducing air pollution could help to reduce overall health inequalities.

**Figure 5.33: Estimate of population exposed to NO<sub>2</sub> concentrations in exceedance of the EU Air Quality Objective, 2008-2020**



Aether 2013

5.14.9 Newham, Brent, Redbridge, Hackney and Tower Hamlets are the boroughs that have the highest proportion of most deprived populations (30 per cent most deprived) in London’s areas of worst air quality. Tower Hamlets, Camden, Southwark, Islington and City of Westminster are the boroughs that have the highest number of people living in London’s worst air quality areas. These boroughs in particular need targeted action to reduce inequalities in access to clean air. The implementation of ULEZ, retro-fitting of buses and licensing new taxis to be ZEC from 2018 will also help to improve air quality by 2025, however Defra’s projections show that London will still exceed limit values in 2020<sup>194</sup>.

5.14.10 Evidence shows overall, there has been a gradual reduction in all of the major air quality metrics, such as NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>x</sub> concentrations at background sites in Inner and Outer London and Outer London roadside sites. Inner London NO<sub>2</sub> roadside sites have a more variable trend but have seen a steeper decline from 2012. This decline is also reflected in the Inner London PM<sub>10</sub> roadside sites.

<sup>193</sup> GLA Economics (2016), Economic Evidence Base, Chapter 7

<sup>194</sup> Defra, 2015 – Air Quality Plan

5.14.11 This analysis is supported by analysis at most individual monitoring sites, although the dynamic nature of air pollution and the way it is affected by multiple factors (temporary issues like construction activity, weather, local road layouts etc.), mean concentrations at some sites can go up while the overall trend across the city is improving.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• High levels of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from road transport</li> <li>• Little to no predicted reduction in PM<sub>10</sub> and PM<sub>2.5</sub> emissions from road transport between 2013 and 2030</li> <li>• London is not compliant with legal limit values for NO<sub>2</sub></li> <li>• Large numbers of the population are exposed to levels of NO<sub>2</sub> above the EU limit value</li> <li>• Exposure to poor air quality is unequal across London and some areas are more exposed to poor air quality than others</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Opportunities to extend policies such as ULEZ.</li> <li>• Technological developments such as the availability of cheaper electric vehicles.</li> <li>• Integration of green infrastructure enhancements in new development</li> <li>• Shift to decentralised energy</li> <li>• Enhance London’s position as a world leader in ultra low emission technology</li> </ul>
<b>Implications of the plans and programme review</b>	<ul style="list-style-type: none"> <li>• The urgent need to meet mandatory standards for air quality and cut the annual number of premature deaths from air pollution-related diseases by almost 40 per cent by 2020</li> <li>• London’s entire transport system to be zero emission by 2050</li> </ul>
<b>Suggested IIA Objectives</b>	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure

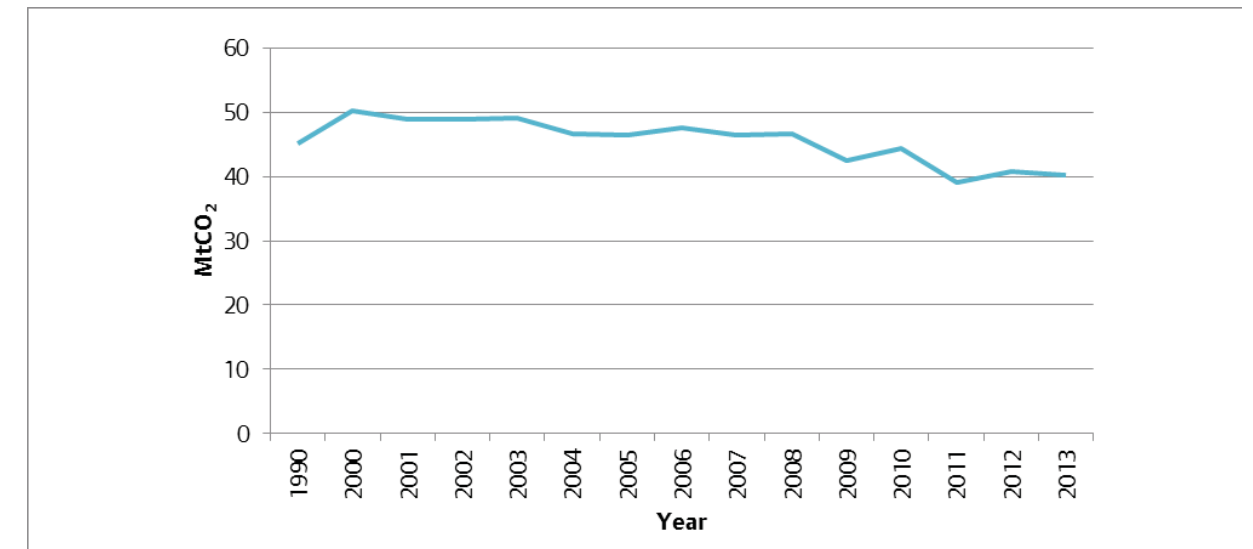
## 5.15 Climate Change

Climate Change Mitigation refers to efforts to reduce or prevent emission of greenhouse gases. Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour

### Mitigation

- 5.15.1 Climate change mitigation refers to efforts to reduce or prevent emission of greenhouse gases (GHG). These emissions are altering the composition of the atmosphere and contributing to climate change. Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour. Carbon dioxide (CO<sub>2</sub>) is the most abundant GHG globally, and concentrations in the atmosphere have risen from around 280 ppm in 1900 to over 400ppm in 2016. The United Nation's Intergovernmental Panel on Climate Change (IPCC) estimate that CO<sub>2</sub> concentrations must be stabilised at 450ppm to have a fair chance of avoiding global warming above 20C, which could carry catastrophic consequences. To help meet this global challenge, the UK is committed through the Climate Change Act (2008) to reduce CO<sub>2</sub> emissions by at least 80 per cent on 1990 levels. For London, alongside wider national initiatives, in 2011 the Mayor committed to reducing the capital's emissions of CO<sub>2</sub> by 80 per cent by 2050, relative to 1990 levels. The Mayor has also committed to making London a zero carbon city by 2050.
- 5.15.2 The GLA maintains the London Energy and Greenhouse Gas Inventory (LEGGI) to record the city's progress against the GHG reduction target. It uses data on energy use from the Department of Energy and Climate Change (now Business, Energy and Industrial Strategy) and Transport for London (TfL). The data is presented on an "end user" basis; therefore emissions from the production and processing of fuel are reallocated to the consumers, to reflect the total emissions for each fuel use. The fuel use is multiplied by a CO<sub>2</sub> equivalent (CO<sub>2e</sub>) emissions factor. The latest data available is for 2014, where it is estimated to be 37.8 Mt CO<sub>2e</sub>.
- 5.15.3 Since 1990, London's CO<sub>2e</sub> emissions have fallen by 16 per cent (Figure 5.34). This reduction in GHG emissions is largely due to, reduced gas use, a lower carbon national electricity supply and a shift towards the service industry, which is less energy intensive than industrial or manufacturing processes. This 16 per cent reduction has been against a 26 per cent increase in London's population since 1990 to over 8.5 million in 2014. Indeed, per capita emissions have reduced by 34% since 1990 and at 4.4 tonnes per person per year, London's CO<sub>2</sub> emissions are the lowest in the country (on a regional basis).

Figure 5.34 London's CO<sub>2e</sub> Emissions

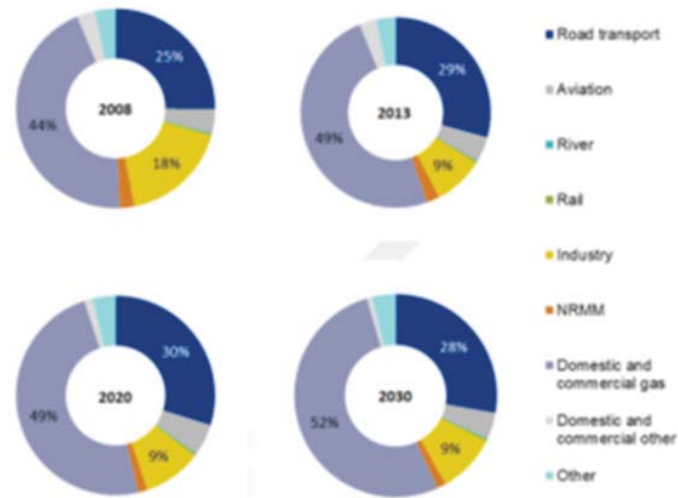


*London Energy and Greenhouse Gas Inventory*

- 5.15.4 In 2014, 35 percent of emissions were generated from dwellings, 42 per cent from businesses, and 23 per cent from London's transport. The vast majority of GHG emissions are therefore from heating and powering buildings. Not only do new buildings need to be low carbon and energy efficient, but it is important that the existing building stock is also as energy efficiency as possible.
- 5.15.5 London is set to miss its target to reduce emissions by 60 per cent on 1990 levels by 2025. To get close to the 2025 target and make sure London is on course to reducing GHG emissions by at least 80 per cent by 2050 immediate action needs to be taken to reduce energy demand, be more effective in supplying affordable local low carbon energy and support de-carbonisation of the national electricity grid. London may well have to go beyond an 80 per cent reduction to meet the Mayor's ambition for a zero carbon London by 2050 and to help keep global temperature increase to less than 1.5 degrees as globally agreed through the UNFCCC negotiations in Paris. This is known as the 'Paris Agreement' and is set to come into force in 2020.
- 5.15.6 As illustrated in Figure 5.35, road transport also currently contributes significantly to emissions of CO<sub>2</sub>. Other forms of transport such as rail and river contribute only a small amount to CO<sub>2</sub> emissions in comparison to road transport and other non-transport contributors such as non-road mobile machinery (NRMM)<sup>195</sup>, domestic and commercial gas and domestic and commercial other fuels. In 2013 road transport made up approximately 29 per cent of total CO<sub>2</sub> emissions in London, compared with approximately 25 per cent in 2008 and 26 per cent in 2010 (LAEI, 2013).

<sup>195</sup> Non-road mobile machinery (NRMM) - refers to mobile machines, transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads.

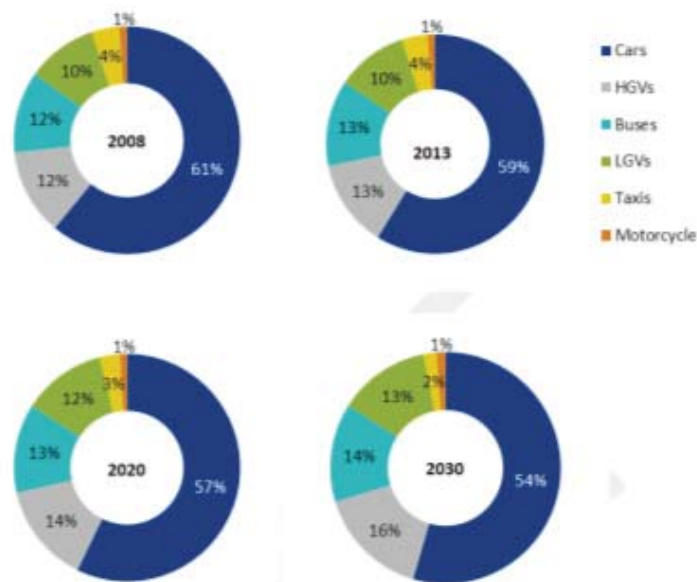
Figure 5.35: CO<sub>2</sub> Emissions 2008 - 2030



Jacobs adapted from LAEI, 2013

5.15.7 Of transport’s contribution to CO<sub>2</sub> emissions, cars make the greatest contribution followed by HGVs and buses. Figure 5.36 shows that cars will continue to make the greatest contribution to CO<sub>2</sub> emissions, however their contribution in comparison to HGVs and buses decreases to 2030. CO<sub>2</sub> emissions from HGVs and buses are expected to increase. LAEI forecasts bus CO<sub>2</sub> to decrease between 2013 and 2020, before increasing slightly to 2030 – but still well below 2013 levels and prior.

Figure 5.36 Road transport’s contribution to total CO<sub>2</sub> emissions by mode, 2008 – 2030



Jacobs adapted from LAEI, 2013

- 5.15.8 Changing patterns of land use, such as the loss of industrial land within London and moves towards different models in the logistics sector, increasingly suggest there may be greater demand for larger logistics hubs outside London and more and smaller facilities within. A move towards a hub and spoke model has implications for spatial movement patterns, in particular white van traffic generation as they often provide the last leg in the journey for goods ordered online.
- 5.15.9 As shown in Figure 5.37 while total CO<sub>2</sub> emissions from transport are expected to decrease over time, transport’s overall contribution to CO<sub>2</sub> emissions remains around the same, falling by a total of 2 per cent by 2030.


Figure 5.37: Total road transport CO<sub>2</sub> emissions (tonnes), 2008 – 2030

	2008	2013	2020	2030
Total road transport emissions for the GLA (tonnes)	7,337,105	6,651,511	6,106,822	5,728,930
Road transport contribution to total CO <sub>2</sub> emissions for the GLA (per cent)	25 per cent	29 per cent	30 per cent	28 per cent

LAEI, 2013

- 5.15.10 The requirement for transportation within, to and from London will continue to grow and so it is imperative that the transport sector is decarbonised, including private vehicles which are overwhelmingly currently reliant upon fossil fuels (petrol and diesel).
- 5.15.11 London is a global city and should play a leading role in reducing greenhouse gas emissions both within London’s boundary and outside of the capital. Arguably London has fallen behind other global cities in efforts to mitigate climate change and it is important that London re-establishes its position as a leader in the low carbon economy. This is essential to London’s economic competitiveness and also our ability to influence and assist other cities to transition to a low carbon future.



<b>Key issues</b>	<ul style="list-style-type: none"> <li>London is not currently meeting the Mayor’s CO<sub>2</sub> emission target of 60 per cent reduction of 1990 levels by 2025</li> <li>Transport will continue to contribute significantly to CO<sub>2</sub> emissions</li> <li>Inefficient existing building stock</li> <li>CO<sub>2</sub> emissions from buildings continue to rise</li> <li>London is no longer a global leader in terms of transitioning towards a low carbon economy</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Transition to a low carbon economy, enhancing London’s position as a world leader in low carbon good and services.</li> <li>Reducing fuel bills by reducing demand for energy</li> <li>Potential for positive health benefits by helping reduce air pollution through the generation and supply of clean (low or zero emission) energy for buildings and transport.</li> <li>Reducing carbon emissions by shifting to more sustainable modes of transport</li> </ul>
<b>Implications of the plans and programmes Review</b>	Review options to achieve zero net carbon emissions by 2050. Need to design buildings and spaces to adapt and mitigate the effects of climate change, including overheating, flooding, droughts and more extreme weather events. The Mayor has a commitment to reduce London’s CO <sub>2</sub> emissions by 60 per cent by 2025
	
<b>Suggested IIA Objectives</b>	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050

### Climate Change Adaptation

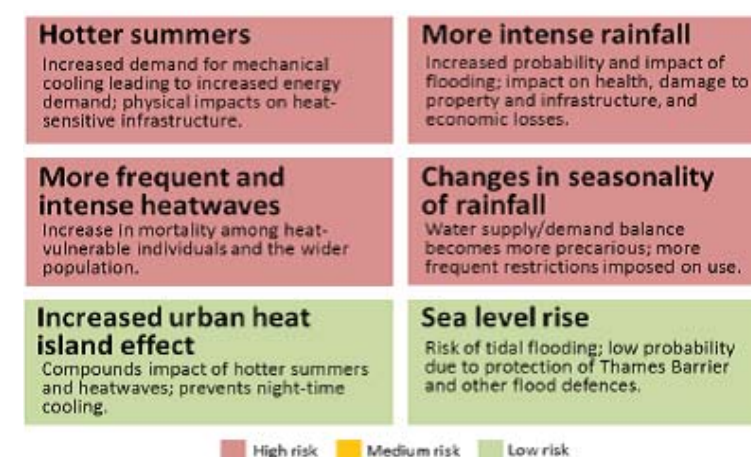
Climate Change Adaptation is the adjustment in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderates harm or exploits beneficial opportunities.

5.15.12 Climate change is one of the key challenges facing the UK and the world today. It poses many environmental risks; including extended period of dryness and heat in the summer which could lead to drought; heightened flood risk due to more intensive and prolonged rainfall, particularly in winter months; and sea level rise and changes in wave patterns and strength which may result in increased erosion of coastal areas. Such environmental effects may also have significant socio-economic and health implications, particularly for nations and regions less able to mitigate or adapt to changes.

5.15.13 The changing climate and associated extreme weather events such as higher summer temperatures; warmer winters; more seasonable rainfall; wetter winters; and rising sea levels are applying pressure to London’s infrastructure including transport, homes, public buildings and businesses.

5.15.14 Analysis from the Carbon Disclosure Project outlined six current and anticipated effects of climate change for London, which are shown in the following diagram.

**Figure 5.38: Current and anticipated effects of climate change in London**



*Carbon Disclosure Project, data provided for the CDP Cities 2013 report, GLA, 2013*

5.15.15 The impacts of climate change are set to increase with London facing the following risks:

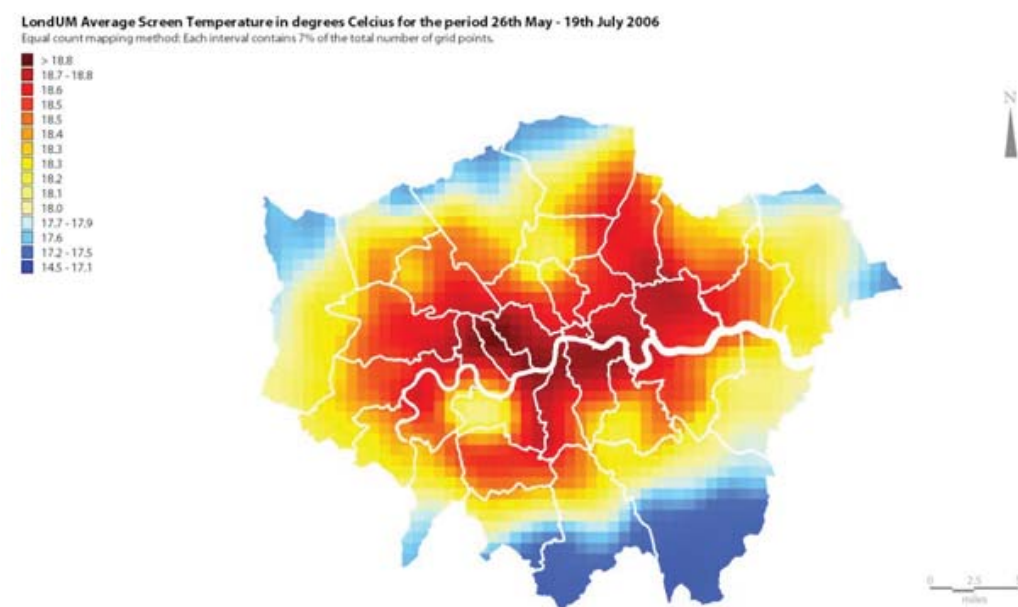
- Flood risk** - London is relatively well protected against tidal flooding (subject to continued delivery of actions as part of the TE2100 Plan), but parts of London are vulnerable to river, surface water, groundwater and sewer flooding.
- Drought** - if there are two consecutive dry winters, London is at risk of drought conditions and water supply restrictions.
- Heat risk** - London is getting hotter: extreme hot weather events occurring more frequently, changing demographics, increased urban development and densification are all contributory factors.

Flood risk and drought (water supply) will be explained in more detail in sections 5.18 and 5.17.

### Heat Risk

- 5.15.16 Higher average temperature are likely to intensify the Urban Heat Island (UHI) effect which can result in the centre of London being up to 10°C warmer than its surroundings. Summer heatwaves may make the built environment uncomfortable, and can affect the health of Londoners, particularly vulnerable people. The Urban Heat Island effect is most intense at night and is mainly experienced within the Central Activities Zone. According to the Heatwave Plan for England by 2080, the temperature in towns and cities could rise by 10°C, peaking at up to 40°C (104F) in London.<sup>196</sup>
- 5.15.17 Heat islands can develop in fairly large areas within a city, or in smaller ‘pockets’ around individual buildings or along streets. London has a fairly pronounced UHI due to its size and density as shown below. The variation of temperature can depend upon the nature of the land cover with parks and lakes cooler than adjacent areas covered by buildings which absorb and trap heat.

**Figure 5.39: Summer Urban Heat Island 2006 - average surface temperatures over the summer period of 2006**



*Development of a Local Urban Climate Model and its Application to the Intelligent Development of Cities (LUCID), (University College London)*


- 5.15.18 The UK Climate Change Projections 2009 (UKCP09) show what the major changes to the UK's climate would most likely be in the absence of action to cut global emissions. In summary, the UK will experience warmer, wetter winters, hotter and drier summers, sea level rises,

<sup>196</sup> Hajat, S; Vardoulakis, S; Heaviside, C; Eggen, B (2014), Heatwave Plan for England, 2004, Climate change effects on human health: projections of temperature-related mortality for the UK during the 2020s, 2050s and 2080s. Journal of epidemiology and community health.

and more severe weather. Based on a ‘medium emissions’ pathway, which according to the Climate Committee is the one that the world is currently most closely following, the South East could see average summer temperature increases of 3.9°C by the 2080s. At the same time there could be a 22 per cent decrease in average summer rainfall in the South East. Very cold winters will still occur, but will occur less frequently. The UKCP09 projections also suggest that by 2050, one third of London's summers may exceed the Met Office current heat wave temperature threshold (day time temperature of 32°C and night time temperature of 18°C).

- 5.15.19 The main causes of illness and death during periods of high temperatures are related to respiratory and cardiovascular conditions. Elderly people over 65 years old in urban areas (especially those over 75 or living alone as well as low levels of social connection), people with compromised health, pregnant women and children up to the age of four are also particularly at risk. In the absence of any approaches to address urban heat risk, heat-related deaths would be expected to rise by around 257 per cent, more than double, by the 2050s from a current annual baseline of around 2,000 deaths.<sup>197</sup>
- 5.15.20 The intensification of development in London to accommodate a growing population is likely to increase the UHI effect and further increase the risk of overheating. The University College London's LUCID project shows that many of London's dwellings are vulnerable to heat. The monitoring of 36 London's dwellings during a hot spell demonstrated that night time bedroom temperatures were above the upper comfort threshold recommended by Chartered Institute of Building Services Engineers (CIBSE). It concluded that the thermal performance of buildings is a bigger influence on the internal temperatures of buildings than the location in the urban heat island.
- 5.15.21 In addition, future increases in electricity demand for cooling, as a result of rising temperatures, could affect London's energy supply. For example, extremely high demands on London's power supply network due to high cooling demand could lead to subsequent ‘brown outs’ meaning a reduction in or restriction on the availability of electrical power in a particular area.
- 5.15.22 The effects of climate change also pose a significant risk to London's economy. For example, hotter summers and more frequent and intense heatwaves may reduce productivity and economic output as a result of heat-related illness, as well as impacting infrastructure, for example road and rail infrastructure failure and/or increased calls on electricity supply for air conditioning.

<sup>197</sup> Hajat, S; Vardoulakis, S; Heaviside, C; Eggen, B (2014) Climate change effects on human health: projections of temperature-related mortality for the UK during the 2020s, 2050s and 2080s. Journal of epidemiology and community health. 0, p1-8

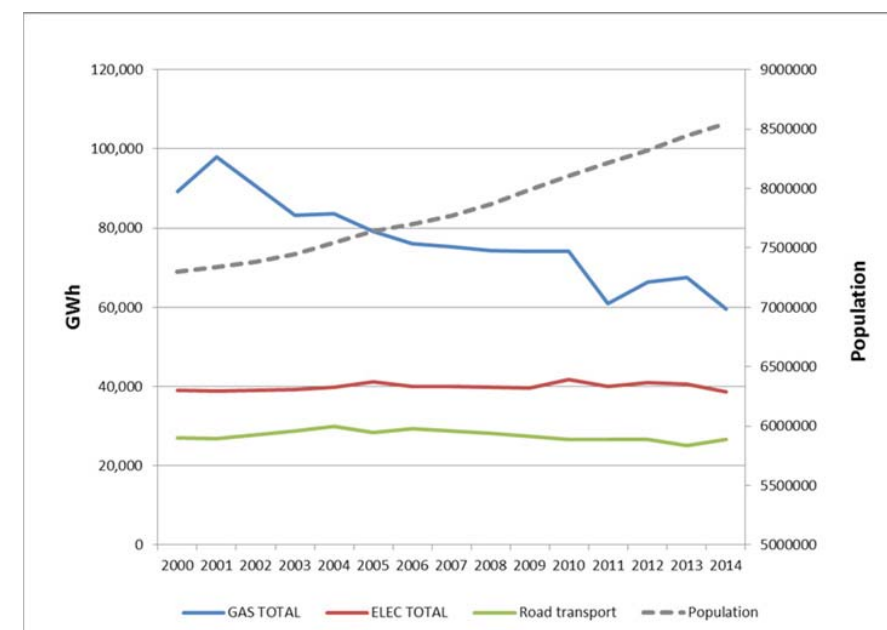
<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Increase in extreme weather events such as flood risk, drought and heat risk and associated impacts</li> <li>• Changing demographics such as an ageing population and more under five year olds increasing the number of potentially vulnerable people.</li> <li>• Design of building causes a larger variation in temperature exposure than the Urban Heat Island (UHI) effect</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Promotion of sustainable building design to reduce the urban heat island effect</li> <li>• Maximise amount of green coverage to help reduce effects</li> <li>• Use of other Mayoral Strategies to raise awareness and promote behaviour change.</li> <li>• Making use of green infrastructure associated with transport networks for climate change adaptation, i.e. sustainable drainage, energy generation water conservation</li> </ul>
<b>Implications of the plans and programmes review</b>	Need to design buildings and spaces to adapt and mitigate the effects of climate change, including overheating, flooding, droughts and more extreme weather events. The Mayor has a commitment to reduce London's CO <sub>2</sub> emissions by 60 per cent by 2025
	
<b>Suggested IIA Objectives</b>	<ul style="list-style-type: none"> <li>• To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as, flood drought and heat risks</li> <li>• To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050</li> </ul>

## 5.16 Energy Use and Supply

The supply of and demand for energy by industry, transport and households

- 5.16.1 Reducing overall energy consumption and being more energy efficient is vital to reducing greenhouse gas emissions and contributing to a secure energy future. Reducing energy consumption through more efficient buildings and appliances can also help to tackle issues of energy affordability and fuel poverty<sup>198</sup>.
- 5.16.2 The demand for energy and its form changes by season. In the winter months, consumption of gas is higher due to use of central heating for buildings. However in the summer months, there is a general shift towards higher electricity use from air conditioning to cool buildings. Consumption can also vary from year to year depending on the weather.

Figure 5.40: Energy use in London 2000 to 2014



- 5.16.3 London consumed an estimated 133,960 GWh of energy in 2014.<sup>199</sup> This is a 17 per cent reduction on 1990 levels, despite a population increase of 26 per cent. In 2014, 40 per cent of energy was domestic use, 36 per cent from workplaces (the industrial and commercial sector) and 24 per cent from the transport sector<sup>200</sup>.
- 5.16.4 Of the total amount of energy consumed in 2013, 48 per cent was Gas with 29 per cent electricity. However, because of its higher carbon intensity than gas, electricity contributes a proportionally larger amount to London's overall CO<sub>2</sub> emissions. Coal, one of the most carbon intensive fossil fuels, only makes up <1 per cent of the total energy used. Almost all of this is

<sup>198</sup> UK Government (2016) Fuel poverty statistics [online]. Available from: [www.gov.uk/government/collections/fuel-poverty-statistics](http://www.gov.uk/government/collections/fuel-poverty-statistics).

<sup>199</sup> Department of Energy and Climate Change (DECC) and TfL

<sup>200</sup> London Energy and Greenhouse Gas Inventory 2013

- from the industrial and commercial sector. Over one fifth (21 per cent) of energy consumed (29,569 GWh) is from petroleum, primarily used in the transport sector – including rail transport<sup>201</sup>.
- 5.16.5 Gas usage has decreased since 1990, and this trend is expected to continue despite projected population growth, however it is very much dependent upon national energy policies. Electricity usage has stabilised despite the increase in population, largely due to increased efficiency of appliances. However, it is expected that demand for electricity to rise as population continues to grow and heating and transportation are increasingly electrified, in favour of electricity from a decarbonised grid.
- 5.16.6 London, as most cities, has limited renewable energy potential. Such energy sources currently contribute only a small fraction of London’s energy, accounting for 2 per cent of consumption. In 2014 renewable energy generation was 640GWh, down from 700GWh in 2013 – predominantly due to reduced generation from municipal solid waste combustion plants – and projected uptake remains well below the Mayor’s target of 8550GWh by 2026<sup>202</sup>. Despite an increase in photovoltaics delivered on new developments, London has one of the lowest solar installation rates in the UK.
- 5.16.7 Capacity of the energy supply is also a concern. Significant new investment is already urgently needed in electricity substations capacity and distribution to keep up with demand and to accommodate the step change in the rate of house delivery that is required.<sup>203</sup> One in five substations has less than 7 per cent spare capacity.
- 5.16.8 Fuel poverty continues to be an issue in London, with 9.8 per cent or 326,114 households meeting the Government’s ‘low income high cost’ definition of fuel poverty (compared to 10.4 per cent across England). However as the definition favours larger homes, there may be many households in smaller properties who also struggle to pay their fuel bills despite not meeting the definition. Across London, this varies with areas in the North East and North West with higher rates of fuel poverty than the England average, including 14.9 per cent in Newham and 12 per cent in Brent<sup>204</sup>.
- 5.16.9 One way of helping to tackle energy affordability (including fuel poverty) is to improve the efficiency of London’s buildings and transport. Retrofitting is a huge challenge in London. Over 80 per cent of the buildings standing today will still be occupied in 2050. There are around 3.4 million homes in London, the vast majority of which will need to be retrofitted with building fabric measures (such as cavity wall insulation) and potentially on site renewable energy generation to reduce the energy demand, if GHG reduction targets are to be met. In 2013 around 25 per cent of homes in London were in Energy Performance Certificate Bands E to G (representing poor energy efficiency) This proportion varied widely by tenure, from 13 per cent of housing association homes to 39 per cent of owner occupied homes.<sup>205</sup> A large

<sup>201</sup> Ibid

<sup>202</sup> Mayor of London, London Plan AMR 2014/15

<sup>203</sup> Mayor of London, London Infrastructure Plan 2050


<sup>204</sup> BEIS (2016) 2014 sub-regional fuel poverty data: low income high costs indicator [online]. Available from: <https://www.gov.uk/government/statistics/2014-sub-regional-fuel-poverty-data-low-income-high-costs-indicator>.

<sup>205</sup> DCLG (2013) English Housing Survey: Energy efficiency of English housing [online]. Available from: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445440/EHS\\_Energy\\_efficiency\\_of\\_English\\_housing\\_2013.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445440/EHS_Energy_efficiency_of_English_housing_2013.pdf).

proportion of London’s homes and workplaces are difficult to treat and offer numerous barriers to retrofit that must be overcome.

- 5.16.10 Existing energy resources are not being utilised as effectively as they could be, for example existing energy sources such as waste heat from industrial processes could be used to heat buildings. To encourage more effective use of energy, the Mayor has set a target of meeting 25 per cent of London’s energy demand by 2025 from local production, i.e. decentralised energy: combined heat and power, solar technologies and energy from waste. However, as of 2014 it is estimated that only 5 per cent of London’s energy demand was met from decentralised energy<sup>206</sup>.
- 5.16.11 Managing demand is essential in reducing energy use. Electricity generation in the UK is designed to ensure that peak demand for electricity can always be met. Nationally, more electricity is frequently being generated than is used. With power generation in the UK predominantly fossil fuel based additional greenhouse gas emissions are created that could be avoided. By managing peak demand for electricity within London more effectively could potentially avoid the need for new generation infrastructure. This can be achieved through demand side responses (DSR) and smart energy systems. However, such smart energy systems are embryonic and require rapid development and deployment to prevent unnecessary investment in new (potentially carbon intensive and costly) generation technologies.

<sup>206</sup> DECC (2015) Combined Heat and Power in Scotland, Wales, Northern Ireland and the regions of England in 2014 [online]. Available from: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/462358/Regional\\_CHP\\_2014.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/462358/Regional_CHP_2014.pdf).

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Relatively high and ineffective use of fossil fuels contributing towards London’s GHG emissions and air pollution.</li> <li>• Insufficient low carbon energy supply</li> <li>• High number of Londoners in fuel poverty.</li> <li>• Energy-inefficient building stock &amp; transport.</li> <li>• Un-utilised local energy resources</li> <li>• Increasing electricity demand and need to manage peak electricity demand</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Transition to a low carbon energy supply to help meet GHG reduction targets.</li> <li>• Stimulate the market for installation of energy efficiency measures, renewables deployment, low carbon innovation.</li> <li>• Enhance London’s position as a world leader in low energy – setting an example to other cities heavily reliant upon fossil fuels.</li> <li>• Reducing fuel bills by reducing demand for energy and therefore tackling fuel poverty.</li> <li>• Utilising London’s secondary heat resource.</li> <li>• Potential for positive health benefits by helping reduce air pollution through the generation and supply of clean (low or zero emission) energy for buildings and transport.</li> </ul>
<b>Implications of the plans and programmes review</b>	Widening supply and demand gap. Greater efficiencies, use of renewable energy sources, and importance of low carbon economy.
	
<b>Suggested IIA Objectives</b>	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system

## 5.17 Water Resources and Quality

The supply of water and the quality of water within all water bodies


- 5.17.1 The Environment Agency is responsible for water quality. They also decide how much water can be taken from the environment for people and businesses to use without damaging the environment or compromising existing lawful users. They must also control the volume and quality of discharges made to rivers. Water is supplied to customers in London by four water companies. Thames Water is the largest, the other three are Affinity Water, Essex & Suffolk Water, and Sutton & East Surrey Water. The majority (around 80 per cent) of London’s water is drawn from rivers, principally the Thames to the west of London and the River Lee in North London. Most of the rest of London’s supplies comes from abstracting groundwater.
- 5.17.2 Water resources are already under pressure in London and the south east with a risk of a drought if there are two consecutive dry winters. Such a situation occurred during the winters of 2010-11 and 2011-12. This was only eased by having a significantly wet spring and could easily have become a more severe drought. Severe droughts may have significant economic, social and potentially health implications.
- 5.17.3 The relatively dry nature of the South East, combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use in the country but also having some of the highest rates of leakage from the water supply distribution network.
- 5.17.4 Measures to reduce demand, such as increased water efficiency, reduced leakage and increasing use of water meters are needed throughout London. This will help to manage the supply-demand balance over the short term. However, with a rapidly growing population and some restrictions on water abstraction for environmental reasons, it is also clear that there is a need for new additional water resources in order to maintain a secure water supply-demand balance. Thames Water has identified that a significant new water resource will be required by the mid-2020s.
- 5.17.5 Water quality in rivers, lakes, groundwater and streams is measured through the River Basin Management Plan<sup>207</sup>. Within London, there are 65 separate waterbodies, including tidal water bodies (‘transitional waters’). The ratings of the 65 waterbodies are outlined in Figure 5.42. Of the 65 waterbodies, none are very good, only 2 are good, 50 are moderate, 10 are poor and 3 are bad. This is a poor reflection of London’s waterbodies given that the EU Water Framework Directive aims to get all waterbodies to Good Status or at least to Good Potential.

Figure 5.42: Assessed condition of London’s 65 waterbodies

Bad	Poor	Mod	Good	V Good	All WBs
3	10	50	2	0	65

<sup>207</sup> Defra (2015) Water for life and livelihoods – Part 1: Thames river basin district. River basin management plan [online]. Available from: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/500548/Thames\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500548/Thames_RBD_Part_1_river_basin_management_plan.pdf).

- 5.17.6 The reasons for poor water quality are many and varied. Industrial pollution is quite rare; however the treated effluent from sewage treatment works makes up a significant part of the base flows for some rivers. A significant concern is the numerous wrongly corrected sewers that allow untreated waste water to discharge into rivers. Equally concerning is the impact of storms over the outer London area. This has the effect of washing dust, debris and litter, that has accumulated in the urban area, into rivers.
- 5.17.7 The problem does not occur in inner London where rainwater discharges into the combined sewer system and is transferred to sewage treatment works. The exception in inner London is when the rainfall is sufficiently intense to cause the combined sewer system to overflow. In these cases the untreated sewage is discharged to the Thames without treatment. The Thames Tideway Tunnel project is currently under construction in order to virtually eliminate this as a problem.

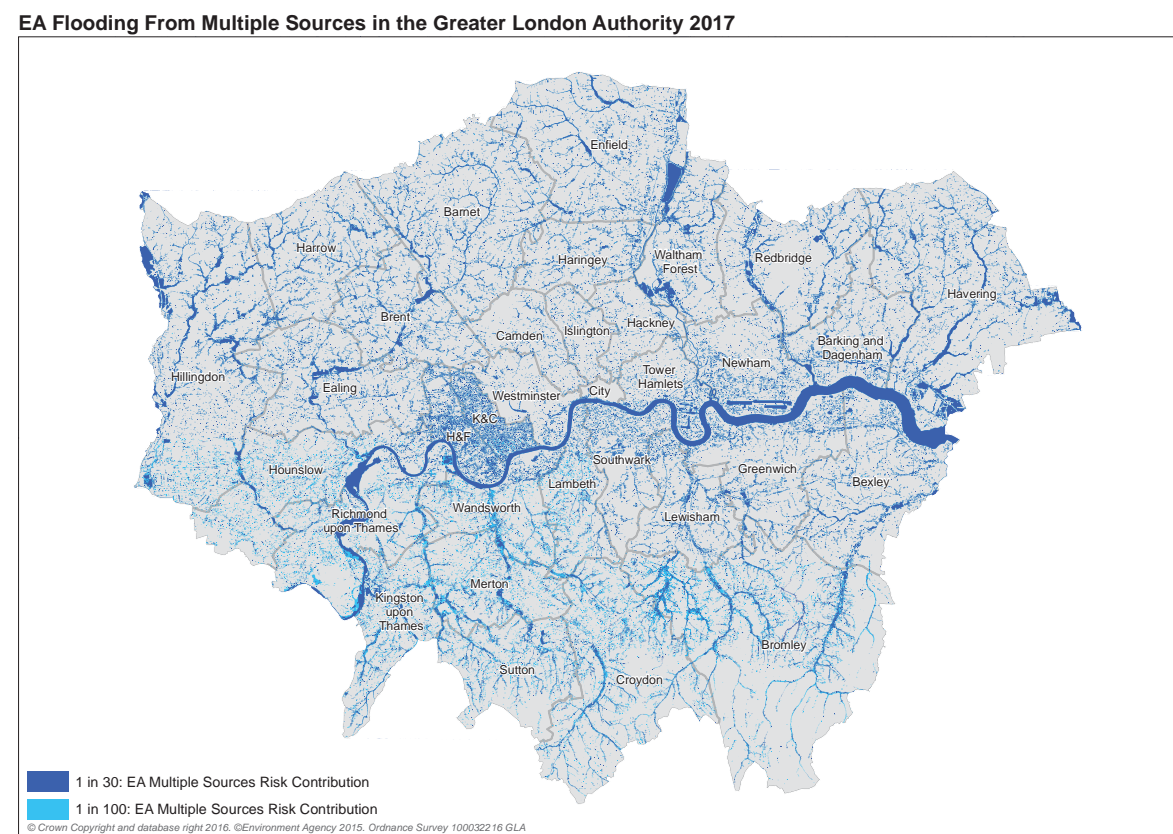
<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Need to reduce per capita water consumption</li> <li>• Need to plan for and deliver additional new water resources</li> <li>• Need to improve the quality of water in London’s waterbodies</li> <li>• Need to improve the physical form of London’s waterbodies</li> <li>• Need to improve sewer and wastewater infrastructure capacity</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Improved river corridors and water quality can improve the public realm and ecological value of London’s Environment</li> <li>• Reduced water consumption can reduce the need/scale of new water resources</li> <li>• Increased use of SUDs can reduce the load on sewer and wastewater infrastructure</li> </ul>
<b>Implications of the plans and programmes review</b>	Identified need to focus on the protection, improvements and sustainable use of the water environment.
	
<b>Suggested IIA Objectives</b>	To protect and enhance London’s water environment by ensuring that London has a sustainable water supply, drainage and sewerage system

### 5.18 Flood Risk

The probability of and potential consequences of flooding from all sources which includes flooding from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems and from reservoirs, canals, lakes and other artificial sources

- 5.18.1 London always has had and will continue to have a degree of flood risk. It is a major issue for London and the probability of flooding is increasing with climate change.
- 5.18.2 In order to accommodate London’s growth, more housing and other forms of development are required, of which some will need to be built in areas with a degree of flood risk. It is important to minimise the number of buildings and people who are located in areas at high risk of flooding. It is also important to ensure that people and buildings within areas of lower risk are nonetheless prepared and resilient, should flooding occur.
- 5.18.3 There are many sources of flooding, including tidal, fluvial, surface water, ground water, sewer and reservoir. Currently 6 per cent of London is at risk of surface water, tidal and fluvial flooding for a 1 in 30 year event and 11 per cent for a 1 in 100 year event.


**Figure 5.43: Flood Risk from multiple sources in Greater London**



Environment Agency

- 5.18.4 Figure 5.43 combines Environment Agency data on flood risk from rivers, the sea and surface water. River and tidal flood risk data is being updated quarterly by the Environment Agency and the data included in this map is from 2016. The surface water flood risk component of the map was produced nationally in 2013. Further updates of the surface water flood risk component will be included when new mapping becomes available based on local studies by Lead Local Flood Authorities (LLFAs). More recent and detailed mapping for London Borough of Hammersmith & Fulham and Royal Borough of Kensington & Chelsea is already included in this map and reflected in the higher-resolution flood risk it shows for these boroughs. This does not necessarily mean that more properties are at risk, although in particular on a London-wide map the higher resolution may give that impression. Figures showing properties at risk per borough are available within the Regional Flood Risk Appraisal.
- 5.18.5 Many parts of London, notably extensive areas on both north and south banks of the Thames are within Flood Zones 2 and 3. These areas have well-built flood defences that currently provide a high level of protection against tidal flooding, in excess of 1 in 1,000-year. There is an agreed strategy, Thames Estuary 2100, to maintain and enhance that protection through the current century, planning for anticipated ongoing climate change and sea level rise and delivering the necessary flood risk management solutions as the impacts arise. These areas can be considered to be at low risk of flooding, however for some areas, there will be a remaining residual risk under particular breach modelling scenarios should the defences fail or be over-topped. New development can generally be built in these areas provided that appropriate layout, design and management issues are built into developments to ensure that they are safe, resilient and can recover in the unlikely event of a flooding incident. Furthermore as most new buildings in London are multi storey, and any flooding that does occur is only likely to affect ground and basement levels, the use of upper floors of buildings can be considered safe for residential development, with caveats about how people in such buildings would cope in the event of a flood.
- 5.18.6 Development in flood zone 3b (the functional floodplain) should be avoided for all but the water dependent forms of development which by their very nature have to be next to rivers – for example a sailing club.
- 5.18.7 Surface water flooding can be caused or exacerbated by blockages to the drainage network. New surface water drainage networks are normally designed to cope with storms of a 1 in 30-year intensity, however many existing systems may be constructed to different standards.
- 5.18.8 In central and inner London, surface water flood risk tends to occur in lots of small, localised areas representing slightly lower ground than the surrounding land. Basement properties and entrances to sub surface car parks, servicing yards etc can be at particular risk of ingress of water. In the rest of London, surface water flooding is often directed to the valleys of those streams which form the naturally lower land areas. Most of these areas are immediately adjacent to built development or even underneath buildings and in such cases those buildings may lie within risk areas. Buildings with large roof areas, such as mainline rail termini, hospitals, schools, retail warehouses are particularly prone to surface water risks under heavy rainfall situations.
- 5.18.9 Reducing the number of properties and people at high risk from flooding and improving the resilience of infrastructure and utilities to flooding is a key challenge for London.

- 5.18.10 Many of London’s remaining large brownfield areas are either substantially or partially at risk of flooding (on average 13 per cent of the area within Opportunity Areas for 1 in 100 year event). However, alternative sites for large scale development within London do not exist without encroaching into Green Belt, Metropolitan Open Land or other protected spaces<sup>208</sup>.
- 5.18.11 Redevelopment, especially at a large scale, often offers opportunities to reduce flood risk, including de-culverting and the re-naturalising of tributary rivers, increasing flood storage capacity, designing the least vulnerable uses to be in the higher flood risk areas and installing sustainable drainage systems. Examples of such flood risk reductions have been demonstrated through major developments like Ram Brewery, Wandsworth, the Queen Elizabeth Olympic Park and many other river restoration schemes throughout London.
- 5.18.12 Sustainable drainage is now a normal element of most large-scale planning application. Many of the strategic planning applications that are referred to the Mayor aim for Greenfield run-off rates, or close to that. The Mayor is also focused on retrofitting sustainable drainage measures to existing buildings and published the London Sustainable Drainage Action Plan in December 2016<sup>209</sup>.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Risk of flooding to property and people from river, surface water, tidal, sewer, ground water and reservoir</li> <li>• Increase in run-off and potential contamination and disruption of flows</li> <li>• Necessary infrastructure needs to be planned for, funded and implemented to support growth and development</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• New development has the potential to manage and reduce flood risk to the development and to the wider local area.</li> <li>• Increased resilience through retrofitting could have long term financial and social benefits</li> <li>• Increased sustainable drainage can reduce flood risk while improving water quality and the urban realm more generally</li> </ul>
<b>Implications of the plans and programmes review</b>	A need to ensure that development is designed not to increase flood risk, to encourage the use of Sustainable Urban Drainage Systems (SUDS) and that all elements of policy require review to ensure that flood risk is reduced and integrated with the management of the rest of London’s Environment.
	
<b>Suggested IIA Objectives</b>	To manage the risk of flooding from all sources and improve the resilience of people and property to flooding

<sup>208</sup> Mayor of London (2014) – Regional Flood Risk Appraisal, GLA  
<sup>209</sup> Mayor of London (2016) London Sustainable Drainage Action Plan, GLA

### 5.19 Natural Environment and Natural Capital

The diversity of habitats and species, and the services provided by London’s green infrastructure.

- 5.19.1 The richness of London’s natural environment includes private gardens, parks and open spaces and green corridors along canals and railways as well as on the River Thames and its tributaries. There is evidence of psychological, physical and social benefits of proximity to, and engagement with, the natural environment. Vegetation, particularly trees, can contribute to air quality improvements and help to reduce the effects of the urban heat island. Increased vegetation also helps to reduce surface run-off. There is strong evidence that people with better access to the natural environment tend to be happier and less prone to mental illness: nature has positive effects on mood, concentration, self-discipline, and physiological stress. Whilst difficult to study, there is also a possible link between access to green space and increases in physical activity as well as the contribution of the natural environment to social cohesion, particularly for well design and maintained green spaces.
- 5.19.2 The Mayor’s Biodiversity Strategy (2002) noted that two-thirds of London’s land area is occupied by green spaces and water. Of this, about a third is private gardens, a third parks or in sports use and a further third is semi-natural habitat, such as grasslands, woodlands and rivers.
- 5.19.3 Since the publication of the Biodiversity Strategy, more detailed land-cover assessments and analyses have been undertaken by Greenspace Information for Greater London using more sophisticated GIS based data. Consequently, it is not feasible to undertake a direct, like-for-like comparison between the land-cover figures published in the Biodiversity Strategy and current land-cover figures because current data would need to be derived from multiple (not fully compatible) datasets. Nevertheless, Figure 5.44 compares data on land cover and habitats where there is comparable data.

**Figure 5.44: Land cover and habitats**

Biodiversity Strategy estimate versus recent recorded coverage		
Habitat or land-use	Biodiversity Strategy (2002)	Most recent data*
<b>Total green space (including gardens)</b>	c. 65 per cent of London’s land area	57 per cent of London’s land area
<b>Total green space (excluding gardens)</b>	32 per cent	33 per cent
<b>Private gardens</b>	c. 33 per cent	22 per cent of which 14 per cent is vegetated space
<b>Total tree canopy cover</b>	c.20 per cent	19.5 per cent**
<b>SINC</b>	29855 ha	30679 ha (2013 data)
<b>Woodland</b>	c. 7000 ha	7569 ha (2009-10 data)

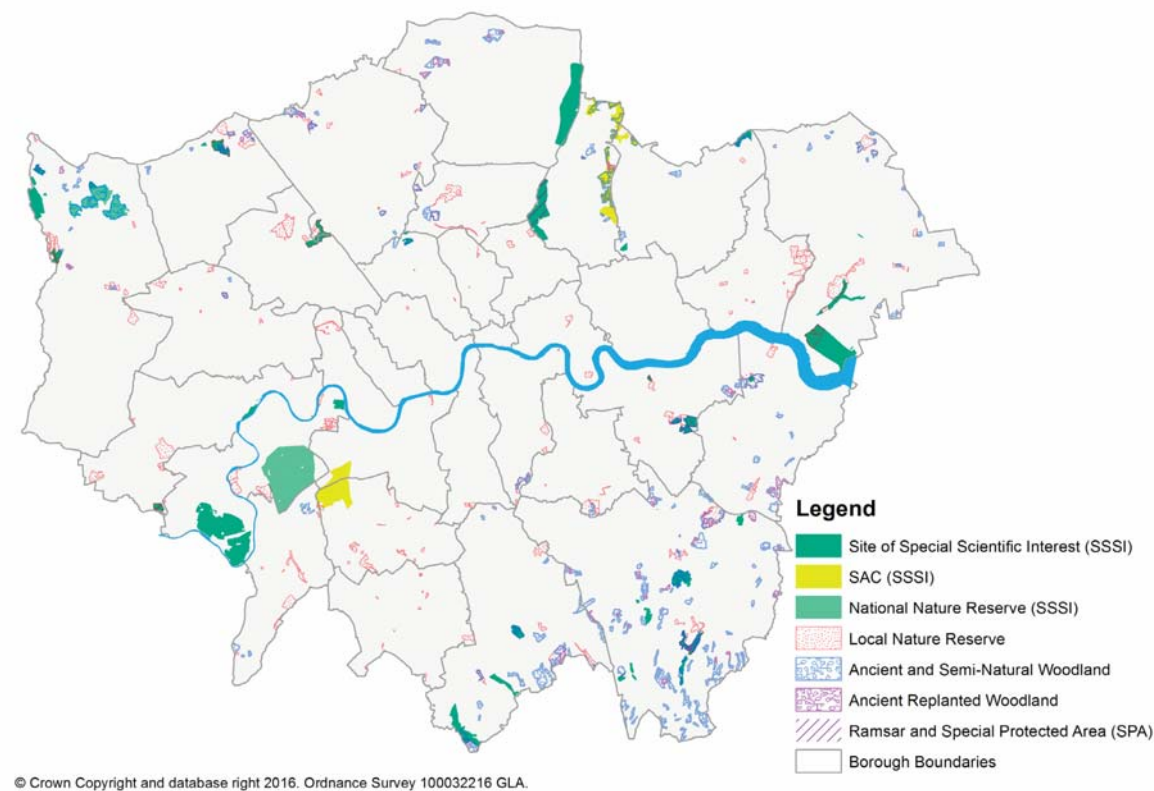
Biodiversity Strategy estimate versus recent recorded coverage		
<b>Chalk Grassland</b>	c. 300 ha	301ha (2009-10 data)
<b>Reedbed</b>	c. 125 ha	142 ha (2009-10 data)
<b>Acid Grassland</b>	c. 1300 ha	1491ha (2009-10 data)
<b>Heathland</b>	c. 80 ha	55 ha (2009-10 data)
* Greenspace Information for Greater London datasets, 2013		
** GLA (2015) Measuring Tree Canopy Cover in London [online]. Available from: <a href="http://www.london.gov.uk/sites/default/files/measuring_tree_canopy_cover_2015.pdf">www.london.gov.uk/sites/default/files/measuring_tree_canopy_cover_2015.pdf</a> .		

- 5.19.4 The data in Figure 5.44 suggest that the biggest reduction in green space in London is vegetated garden space<sup>210</sup>. However, these figures probably do not take into account the loss of ephemeral habitats associated with some brownfield sites awaiting redevelopment as these sites are less easy to classify and are not always identified during land-cover or habitat surveys.
- 5.19.5 Garden green space and vegetated brownfields are particularly important in an urban context because:
  - gardens comprise a significant proportion of London’s green space resource and are places where people can interact with nature most often, and,
  - ephemeral habitats associated with some brownfield sites can provide conditions that mimic sparsely vegetated habitats such as beaches, dunes, and heathlands, that support a wide range of rare or unusual wildlife, particularly invertebrates.
- 5.19.6 There are numerous statutorily designated nature conservation sites and priority habitats within the GLA administrative boundary. These are shown on Figure 5.45 and comprise:
  - Three SACS – Richmond Park in Richmond Upon Thames, Wimbledon Common in Merton and Epping Forest in Waltham Forest;
  - Two SPAs – the Lee Valley in Waltham Forest and South West London Waterbodies in Hounslow;
  - Two Ramsar Sites – the Lee Valley in Waltham Forest and South West London Waterbodies in Hounslow;
  - 38 SSSIs – six in Hillingdon; five in Bromley and three each in Havering, Croydon, Bexley and Waltham Forest. The area of land within SSSIs in London considered to be in favourable or recovering condition has increased from 73 per cent in 2000 to 93 per cent in 2012
  - Three NNRs – Ashted Common in Kingston-upon-Thames, Ruislip Woods in Hillingdon and Richmond Park in Richmond-upon-Thames;
  - 144 LNRs – present in all boroughs except for the City of London, Newham and Kensington and Chelsea;
  - Areas of Ancient and Semi-natural Woodland can be found in 17 boroughs;
  - Areas of Ancient Replanted Woodland can be found in 10 boroughs.

<sup>210</sup> GiGL (N/D) London: Garden City? [online]. Available from: [www.gigl.org.uk/partnershipcasestudy/garden-research/](http://www.gigl.org.uk/partnershipcasestudy/garden-research/)



Figure 5.45: Statutory Designated Sites

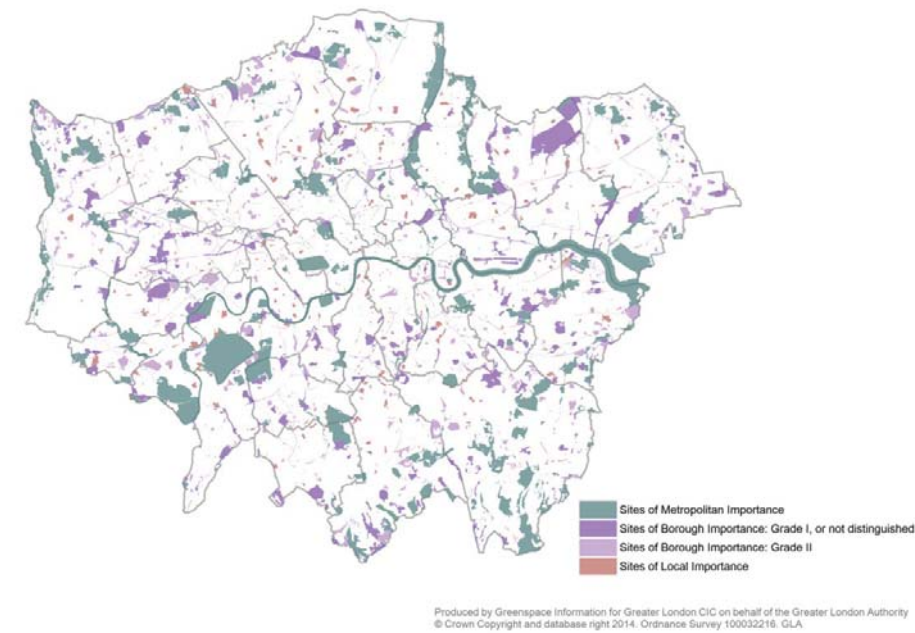


5.19.7 The HRA is required to consider whether there is likely to be any significant likely effects of the new London Plan on all European level sites including SAC/SPA and Ramsar sites. Appendix C details the baseline situation for each of these sites. The HRA will be published for consultation alongside the IIA and draft London Plan.

**London's Sites of Importance for Nature Conservation**

5.19.8 Other important wildlife sites in Greater London are identified as Sites of Importance for Nature Conservation (SINCs).

Figure 5.46 Distribution of Sites of Importance for Nature Conservation in London



5.19.9 SINCs are recognised by the GLA and London borough councils as London's important wildlife sites. In total, over 1,400 SINCs have been identified, covering nearly 20 per cent of the capital.

Figure 5.47 Sites of Importance for Nature Conservation in London

Grade	Area (ha)	per cent of Greater London
<b>Metropolitan</b>	16,249	10.19
<b>Borough</b>	12,652	7.93
<b>Local</b>	1,778	1.12
<b>Total</b>	3,0679	19.24

Figures calculated from GiGL SINC dataset (December 2013)

5.19.10 These are variously graded as Metropolitan, Borough and Local depending upon the relative importance and value of the SINC

- Sites of Metropolitan Importance – About 140 Metropolitan sites have been identified.

They include nationally important wildlife sites such as Richmond Park, Epping Forest and Rainham Marshes, and places such as Sydenham Hill Woods, Eastbrookend Country Park and Hounslow Heath;

- Sites of Borough Importance – there are almost 800 borough sites identified to date. They include woodlands, rivers, grasslands and parks where nature conservation is a primary objective of land management;
- Sites of Local Importance – provide Londoners with access to nature in their local area. Includes parks and green spaces where there is some intrinsic nature conservation value. About 460 Local sites have been identified

5.19.11 Whilst SINC coverage has increased since 2002; there has been losses across London at specific sites.

5.19.12 SINC are semi-natural so require constant management to maintain their wildlife value. The percentage of SINC reported to be under positive conservation management has increased from 42 per cent in 2009 to 50 per cent in 2010 and 59 per cent in 2011.

5.19.13 London’s SINC network also includes Sites of Special Scientific Interest (SSSI) – those sites which have a statutory nature conservation designation. The condition of these sites are monitored at a national level. The area of land within SSSIs in London considered to be in favourable or recovering condition has increased from 73 per cent in 2000 to 93 per cent in 2012.

**London’s urban forest**

5.19.14 London’s urban forest comprises areas of extensive woodland, wooded landscapes in parks and open spaces, trees in residential gardens and street trees. The total area of London’s urban forest appears to have remained relatively static over the past 10 years, with estimated coverage of c20 per cent.<sup>211</sup> Valuing London’s Urban Forest - the report of the London i-Tree Eco Project – indicates that London’s trees provide at least £133M of benefits every year in terms of air pollution removal, carbon sequestration and reducing the surface run off.<sup>212</sup>

**London’s gardens**

5.19.15 Private gardens provide many people with daily contact with nature and form a pleasant component of residential areas. A single garden may provide habitat for a range of plants and wildlife and collectively they are an important resource for conserving species such as hedgehogs, amphibians and pollinating insects.

5.19.16 A report<sup>213</sup> on changes in London’s domestic gardens shows that between 1998-99 and 2006-08:

<sup>211</sup> Mayor of London (2015) Measuring Tree Canopy Cover in London [online], GLA. Available from: [www.london.gov.uk/sites/default/files/measuring\\_tree\\_canopy\\_cover\\_2015.pdf](http://www.london.gov.uk/sites/default/files/measuring_tree_canopy_cover_2015.pdf)

<sup>212</sup> Treeconomics London, (2015), “Valuing London’s Urban Forest: Results of the London i-Tree Eco Project” [http://www.forestry.gov.uk/pdf/2890-Forest\\_Report\\_Pages.pdf/\\$FILE/2890-Forest\\_Report\\_Pages.pdf](http://www.forestry.gov.uk/pdf/2890-Forest_Report_Pages.pdf/$FILE/2890-Forest_Report_Pages.pdf). Monetised annual benefits outlined on page 10; benefits of tree planting provided on pages 16 and 17.

<sup>213</sup> London Wildlife Trust and Greenspace Information for Greater London, London: Garden City?,

- The area of vegetated garden land declined by 12 per cent, a loss of 3,000 ha.
- The amount of hard surfacing in London’s gardens increased by 26 per cent or 2,600 ha.
- The area of garden buildings (sheds etc.) increased by 55 per cent or 1,000 ha.
- The amount of garden lawn decreased by 16 per cent or 2,200 ha.

5.19.17 The changes in garden cover are primarily due to many small changes to individual gardens as part of their management and use by homeowners, rather than large scale changes or housing development on garden land (although this can result in significant loss of garden land at a local level). A more proactive policy approach to the intensification of suburbs to increase housing delivery may further reduce the garden coverage over London.

**Areas of Deficiency in access to open space**

5.19.18 London’s publicly accessible green spaces make up about 16 per cent of the capital. The Figure 5.48 below shows the amount London that is deficient in terms of access to different types of open space based on the London Plan benchmarks.

**Figure 5.48: Access Open Space**

London Plan Benchmarks	Per cent of area deficient in access to public open space
>8.0km away from Regional Parks	65 per cent of Greater London
>3.2km away from Metropolitan Parks	26 per cent of Greater London
>1.2km away from) District Parks	45 per cent of Greater London
>400m away from) Local, Small and Pocket Parks	50 per cent of Greater London

5.19.19 Merging all these different layers of deficiency results in 86 per cent of London being deficient in access to at least one type of public open space. However, despite these apparent deficiencies, it should be recognised that some parts of suburban London contain homes with large gardens and therefore lack of access to small local parks may not be a significant issue for some residents. Similarly, Londoners living on the periphery of London may be less concerned about lack of access to Metropolitan or Regional parks in London because of the proximity of similar facilities in the Green Belt around London.

**Areas of Deficiency in access to nature**

5.19.20 Areas of Deficiency in Access to Nature are those areas in London where people have to walk more than 1 km to reach a SINC of at least borough importance. Since 2006, the area of London defined as being deficient in access to nature has fallen from 22 per cent to 16 per cent. Almost 25,000ha of London was classified as being deficient in access to nature in 2010, which is over 9,000 ha less than in 2006. Much of this decrease is likely to have been achieved either by creating better access to sites where there has previously been none or creating new access points to sites already accessible to the public. The creation or restoration of

habitats that has resulted in the increase in the area of SINCs will also have made an important contribution as some Sites of Local Importance will have been upgraded to Sites of Borough Importance.

**London’s bird populations**


- 5.19.21 Between 1994 and 2011, 21 of the 33 bird species monitored by the British Trust for Ornithology increased significantly in London, whilst 7 species declined significantly during this same period. These trends largely mirror national trends. This suggests that there are no particular nature conservation or land management issues which need to be addressed specifically in London, especially as the actual causes for declines are undetermined. However, loss of nest sites in buildings (resulting from the trend to seal buildings for energy efficiency reasons) and the loss of vegetated areas in gardens may well be a reason for the decline in species such as house sparrow, starling, blackbird and swift.
- 5.19.22 Where tailored conservation efforts have been undertaken for particular species, which have an urban or London affiliation, there have been some notable successes, particularly with the creation of biodiverse green roofs, the provision of nest-boxes and protection of nest-sites.

**Natural Capital**

- 5.19.23 Comprehensively valuing the services and benefits provided by the natural environments is becoming more important so that these are properly accounted for when deciding, for example, how to enhance resilience or improve public health when compared to other alternatives. A study undertaken by Natural England estimated that the savings to the NHS through having increased access to green space for every household in England equated to £2.1 billion per annum.<sup>214</sup>
- 5.19.24 Analysis by GLA Economics modelling suggests that house prices within 600 metres of a regional or metropolitan park were between 1.9 per cent and 2.9 per cent higher as a result of that proximity.
- 5.19.25 Programmes of planting trees in urban areas provide a range of both environmental and wellbeing benefits. These include aesthetic improvements to areas becoming a focal point for residents; but they can also act as a means of carbon storage, improve biodiversity, help to reduce localised flooding, and potentially enable reductions in energy usage through helping to cool areas in the summer and provide insulation in the winter. The London i-Tree Eco assessment has looked to provide monetised costs for the environmental benefits and replacement costs of trees currently in the capital; estimating that London’s existing urban forest provides total benefits of £132.7 million per annum.<sup>215</sup>

<sup>214</sup> Natural England, (2009), “Our Natural Health Service: The role of the natural environment in maintaining healthy lives”.

<sup>215</sup> Treeconomics London, (2015), “Valuing London’s Urban Forest: Results of the London i-Tree Eco Project” [http://www.forestry.gov.uk/pdf/2890-Forest\\_Report\\_Pages.pdf/\\$FILE/2890-Forest\\_Report\\_Pages.pdf](http://www.forestry.gov.uk/pdf/2890-Forest_Report_Pages.pdf/$FILE/2890-Forest_Report_Pages.pdf). Monetised annual benefits outlined on page 10; benefits of tree planting provided on pages 16 and 17.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Loss of biodiversity and reduced ecological resilience as a result of increased pressure for development and intensification of existing development</li> <li>• Decrease in Areas of Deficiency in Access to Nature, however increased recreational pressure on existing habitats and green spaces</li> <li>• Impact of climate change</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Improve protection for existing sites identified as being of value for nature conservation and ecosystem services.</li> <li>• Opportunities for increasing integration green infrastructure into the built environment e.g. green roofs and walls, nature-based sustainable drainage.</li> <li>• Improvements to the design and management of parks and open spaces, and the connections between them, to ensure all of the existing network has a richer ecology and is more accessible and permeable.</li> <li>• New typologies of green spaces, and the choice of habitats and species in landscape design, to optimise climate change adaptation benefits and to ensure resilience of existing landscapes</li> <li>• Promotion of the concepts of natural capital, natural capital accounting and ecosystem services in order to build a more robust business-case for the investment in green infrastructure by highlighting the wider economic and social benefits</li> </ul>
<b>Implications of the plans and programmes review</b>	Opportunities to integrate biodiversity and the network of green spaces to provide a range of sustainability benefits, i.e. healthy living, improving air and water quality, cooling the urban environment, enhancing biodiversity and ecological resilience. This could include both enhancing existing habitats and providing new areas for biodiversity as opportunities arise.
	
<b>Suggested IIA Objectives</b>	To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity

### 5.20 Townscape, Landscape and Public Realm

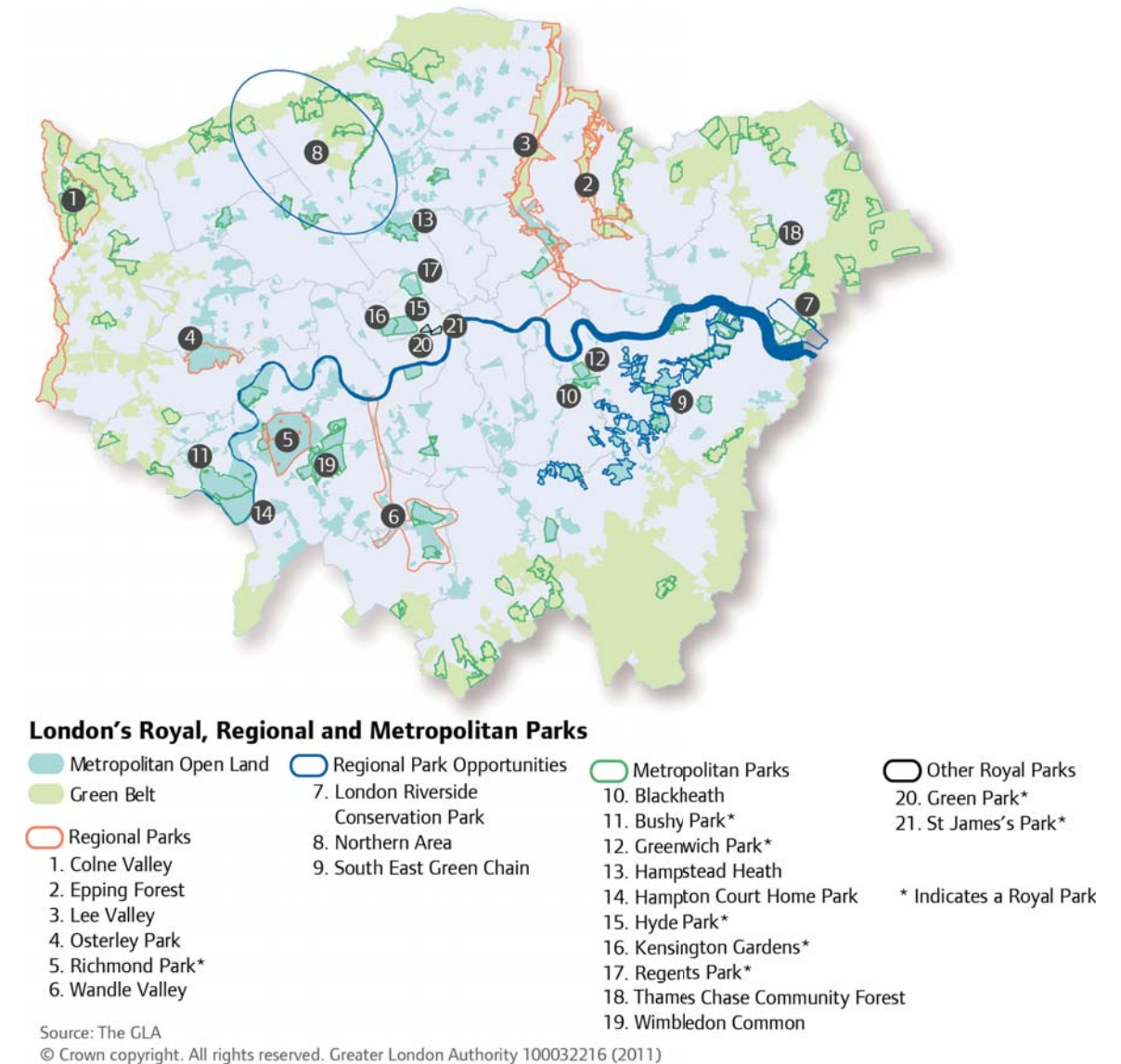
Landscape and townscape is the visual aesthetic of the natural or built environment.

The public realm refers to the quality (including the perception) of publically accessed spaces and places between buildings (streets, footpaths, cycle paths, roads, parks, open spaces etc.)

- 5.20.1 The social, cultural, environmental and economic relationships between people and their communities are reinforced by the physical character of a place.
- 5.20.2 The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space and cultural heritage features. Landscapes vary considerably in character and quality, and are often considered a key component of the distinctiveness of any local area or region.
- 5.20.3 London possesses a wide range of parks and open space, which provide some of the capital's key public assets. Around two-thirds of London's 1,600 square kilometres is occupied by green spaces or water. Approximately a third of this is private gardens, another third is parks or sports facilities and the remaining third is semi-natural habitat, such as grasslands, woodlands and rivers.<sup>216</sup>
- 5.20.4 In addition to the Green Belt, which forms 22 per cent of London's land area, 10 per cent of London is designated Metropolitan Open Land (MOL) within the built environment (this includes spaces such as Richmond Park and Hampstead Heath)
- 5.20.5 Figure 5.49 shows London's open space network including Metropolitan Open Land (MOL), Green Belt and parks.

<sup>216</sup> Mayor of London (2002), Mayor's Biodiversity Strategy, GLA

Figure 5.49: London's Open Space Network.



- 5.20.6 London also includes 22 Natural Landscape Areas (NLAs). A Natural Landscape Area is an area which is an original watercourse, contains vegetation typical of the soils and geology of its area and/or allows an appreciation of the wider geomorphology and natural topography of London.
- 5.20.7 The network of rivers, canals, lakes and docks in London is what the London Plan calls the Blue Ribbon. The network brings together a huge range of different places, used for many different purposes, but which share the unique attribute of water. These water spaces are relatively scarce and past policies have sought to protect and enhance them. More detail on these is discussed in section 5.18.
- 5.20.8 London's publicly accessible green spaces make up about 16 per cent of the capital. However, large areas of London are classified as deficient access to parks.

- 26 per cent of Greater London is deficient in access (i.e. >3.2km away from) to a Metropolitan Park
  - 45 per cent of Greater London is deficient in access (i.e. >1.2km away from) to a District Park
  - 50 per cent of Greater London is deficient in access (i.e. >400m away from) to a Local Park
- 5.20.9 Private gardens provide many people with daily contact with nature. However, the area of vegetated garden land has declined by 12 per cent (3,000ha) between 1998 and 2008 with the amount of garden lawn decreased by 16 per cent (2,200 ha). Again, more detail can be found in the Natural Environment section.
- 5.20.10 Townscape includes the buildings and the activities and spaces between them. London’s historic character is also synonymous with townscape and landscape features, the importance of which is discussed in section 5.21.
- 5.20.11 The scale, form and layout of buildings shape the public realm and create the character and density of an area. Generally density is related to the scale and height of buildings, although tall buildings do not necessarily have a high density. Density is mainly referred to for housing developments.
- 5.20.12 Housing density in London increased from the late 1990s to the early 2000s but has been relatively constant over recent years for development in London as a whole. However, over 50 per cent of development is currently being permitted at densities above the London Plan policy maximums for its location. The policy maximum for housing density is set out in the London Plan Sustainable Residential Quality (SRQ) density matrix. Figure 5.50 below compares the residential density achieved for each scheme against the optimal density range set out in SRQ density matrix in the London Plan, taking into account both the site’s Public Transport Accessibility Level (PTAL) and its setting as defined in the London Plan.


**Figure 5.50: Residential approvals compared to the density matrix**

Financial Year	Per cent of unit approvals		
	Within range	Above range	Below range
2006/07	36 per cent	60 per cent	4 per cent
2007/08	40 per cent	55 per cent	5 per cent
2008/09	41 per cent	53 per cent	7 per cent
2009/10	39 per cent	56 per cent	6 per cent
2010/11	37 per cent	58 per cent	5 per cent
2011/12	40 per cent	55 per cent	5 per cent
2012/13	58 per cent	37 per cent	5 per cent
2013/14	43 per cent	50 per cent	7 per cent

Financial Year	Per cent of unit approvals		
	Within range	Above range	Below range
2014/15	41 per cent	51 per cent	8 per cent

*London Plan Annual Monitoring Report 12 (2014/15)*

- 5.20.13 Tall buildings can have a significant impact on the surrounding environment, particularly in terms of their impact on the townscape and local micro-climate. Protected strategic and local views are an important consideration when considering the location and height of tall buildings, these protected views are discussed in section 5.21. Data from the London Development Database shows that between 2000 and 2015 planning permission was granted for approximately 800 proposals which included a tall building (10+ storey). The majority of these were for buildings of 15 storeys or less, and 70 per cent were for buildings of 20 storeys or less. Of these, only 247 were completed and only 18 per cent of the completions included tall buildings of 20 storeys or more.
- 5.20.14 The public realm is an important feature of the townscape and refers to streets, footpaths, cycle paths, roads, street furniture, public spaces and landscaping etc. Perceptions of the public realm are most commonly related to the maintenance of pavements and roads, the cleanliness of open spaces and the quality of local parks. Other elements which influence perceptions include traffic congestion, road markings, the provision of seating, suitably designed dropped kerbs, signage directions and the extent to which streets are cluttered with signs and street furniture. The quality and inclusiveness of the public realm has a significant influence on quality of life because it affects people’s sense of place, security and belonging, as well as having an influence on a range of health and social factors.
- 5.20.15 There has been a slight increase in the proportion of Londoners who think that the quality of their local area has got ‘a lot’ better over the past year, from 7 per cent in 2011 to 11 per cent in 2012. The main aspects that Londoners are either most satisfied or most dissatisfied with are the quality and cleanliness of open spaces and pavements, and whether parks are well maintained and free of litter. Inner Londoners are significantly more likely to say this than those living in outer London boroughs.
- 5.20.16 The design of streets is also an important element in the improving people perception of the public realm. It can encourage active travel including walking and cycling which in turn can improve people’s physical activity and helps tackle health issues such as obesity. Attractive streets can also encourage people to socialise and play, building stronger social networks and reducing social isolation, both of which are important for physical and mental health. The provision of shade through trees can help to protect people from sun damage and enables people to cool and regulate their body temperature; and the provision of resting places can help people who have mobility impairments and need places to stop and rest to break up a longer walking and/ or cycle distance.
- 5.20.17 The intensification of London could impact the physical character of London’s landscape and townscape, and can result in loss of sense of place if poorly designed.

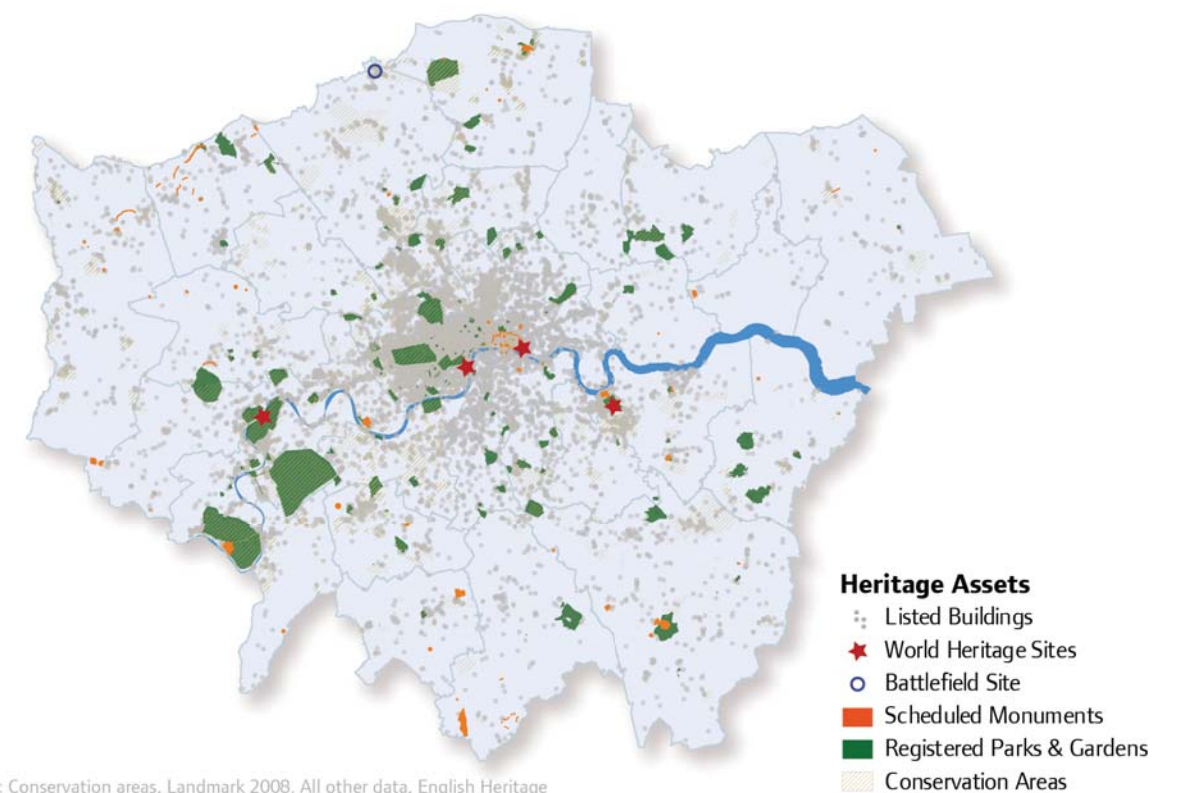
<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Poor quality public realm in some parts of London which can discourage active travel</li> <li>• Deficiencies in open spaces in some parts of the city</li> <li>• Risk of poor design, harm to the distinctive character of places, lack of legible neighbourhoods and sense of place</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• To promote high quality design to create and maintain a safe and attractive public realm which encourages people to walk and cycling, promoting a sense of place and reducing the need to travel</li> <li>• To develop better contextual townscape design to enable new developments of greater density than existing to integrate and reflect London's special character</li> <li>• To promote the provision and use of green linkages and connections</li> </ul>
<b>Implications of the plans and programmes review</b>	Importance of creating and maintain a safe and attractive public realm which encourages people to walk and cycling, promoting a sense of place and reducing the need to travel.
	
<b>Suggested IIA Objectives</b>	<ul style="list-style-type: none"> <li>• To contribute to safety and security and the perceptions of safety</li> <li>• To create attractive, mixed use neighbourhoods ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorized transport</li> </ul>

## 5.21 Historic Environment

London's heritage including designated heritage assets such as listed buildings, registered historic parks and gardens and other natural landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials and historic views and settings.

- 5.21.1 London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. One of the things that makes London distinctive is the way it combines the old and the new. London's heritage assets and historic environment make a significant contribution to the city's culture by providing easy access to the history of the city and its places. Recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. In addition to buildings, street patterns, industrial development, open spaces and landscapes, people can perceive the story of the city through plaques, monuments, museums, artefacts, photography and literature.
- 5.21.2 London's designated and non-designated heritage assets range from the Georgian squares of Bloomsbury to Kew Gardens (Victorian) and the Royal Parks, and include ancient places of work like the Inns of Court (medieval in origin), distinctive residential areas like Hampstead Garden Suburb (early twentieth century) and vibrant town centres and shopping areas like Brixton and the West End. This sheer variety is an important element of London's vibrant economic success, world class status and unique character.

**Figure 5.51: Spatial distribution of designated assets in London, 2013**



5.21.3 Designated assets<sup>217</sup> currently include

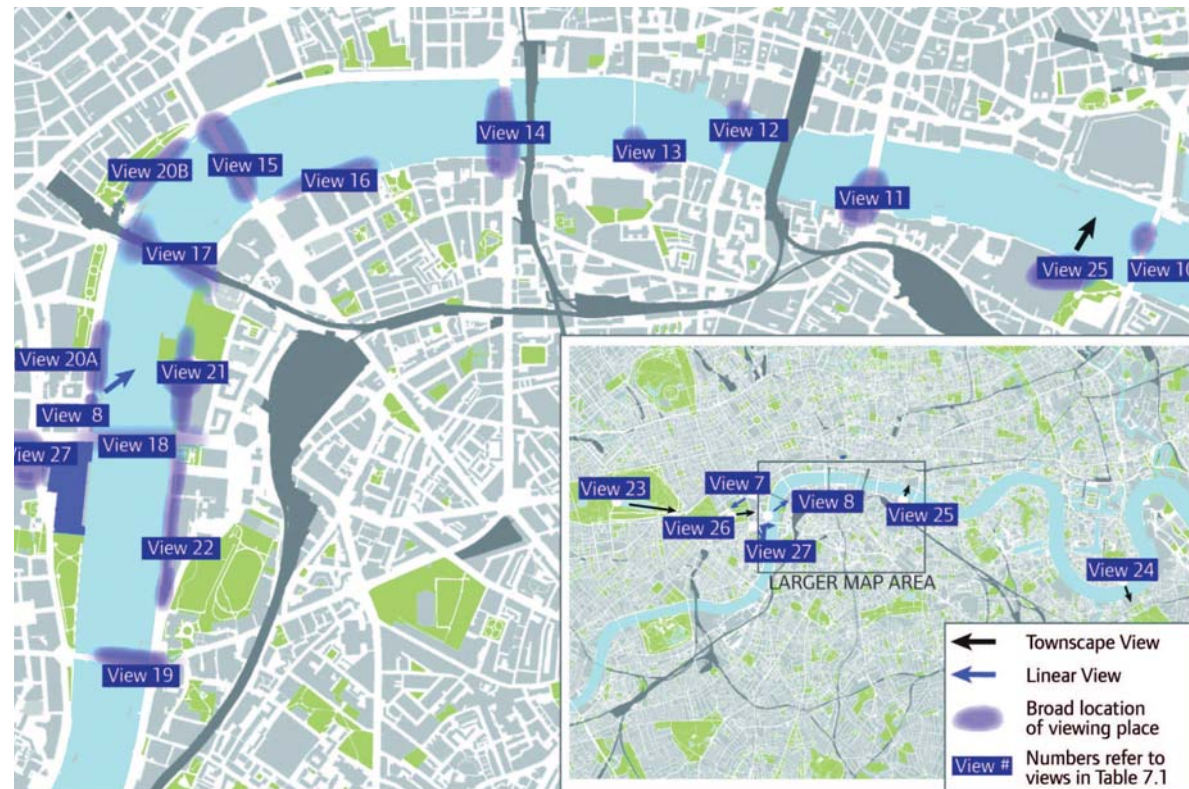
- 4 UNESCO World Heritage Sites, including the Royal Botanic Gardens, Kew, Maritime Greenwich, the Tower of London and the Palace of Westminster;
- 199 scheduled monuments, including over one quarter (57) in the City of London, 17 in Croydon and 16 in Harrow;
- Over 150 registered parks and gardens;
- 1 registered battlefield, London Borough of Barnet;
- 18,912 listed buildings (591 Grade I, 1,394 Grade II\* and 16,927 Grade II); and
- Over 1,000 Conservation Areas.

5.21.4 As well as a number of Archaeological Priority Areas (APAs) and locally designated assets such as locally listed buildings and areas of special character. The Greater London Historic Environment Record (GLHER) provides a resource to understand the historic environment in London.

**Protected views**

5.21.5 There are 27 designated views in the London Plan comprising 3 types; London Panoramas, River Prospects and Townscape Views. These views include significant buildings or urban landscapes that help to define London at a strategic level (see figure 5.52).

**Figure 5.52: River Prospects**



Crown copyright. All rights reserved.  
Greater London Authority 100032216 (2011)

London Plan 2016

<sup>217</sup> Mayor of London (2016), The London Plan, GLA

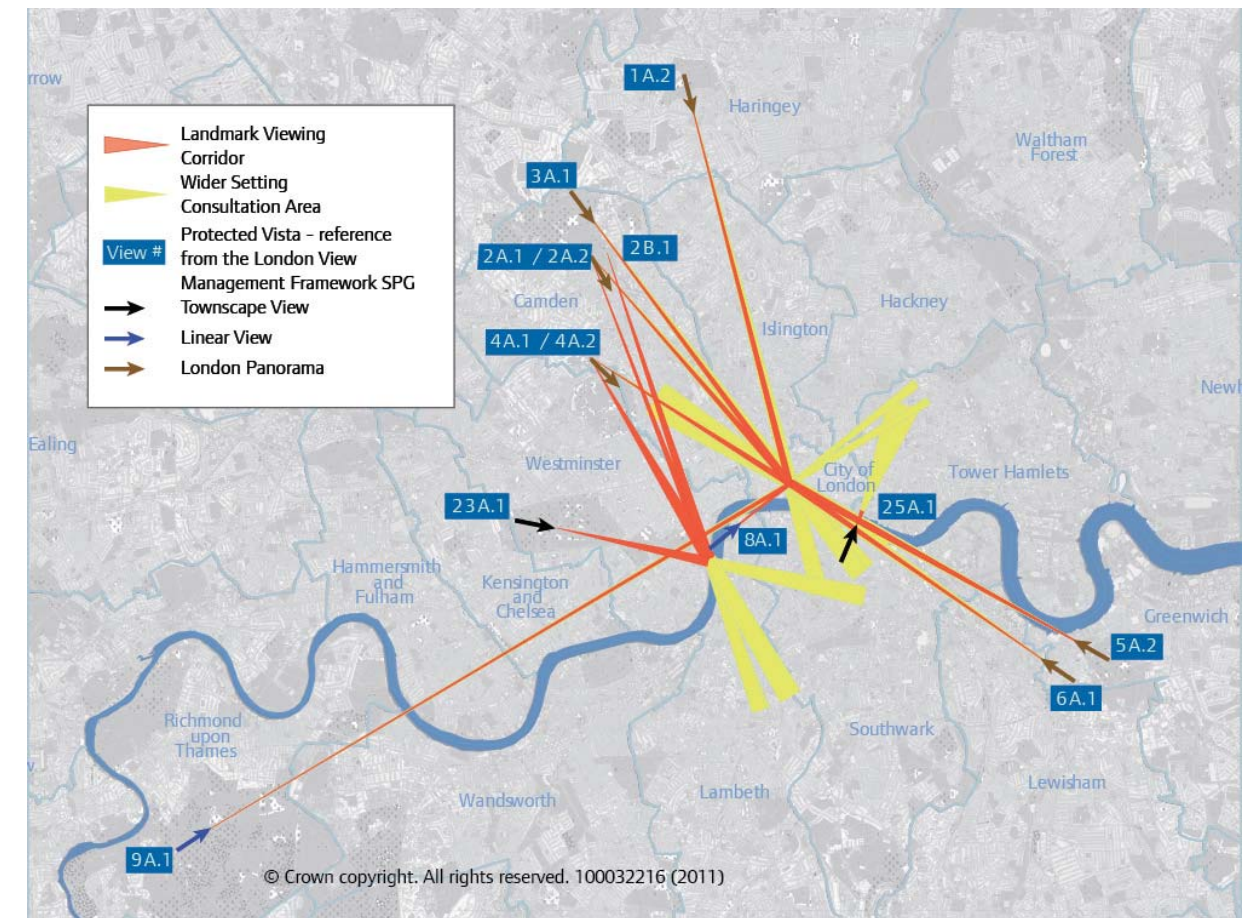
5.21.6 The Mayor seeks to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development will often make a positive contribution to the views however, in other cases development may compromise the setting or visibility of a key landmark. The majority of views are focused along the river Thames

5.21.7 Within some views, a Protected Vista to a strategically important landmark (St Paul’s Cathedral, the Palace of Westminster and the Tower of London) is also defined. These views have stronger protection than the other types of views in that a height threshold for development is defined directly between the viewing point and the strategically important landmark (Landmark Viewing Corridor). Figure 5.53 shows these Protected Vistas.

5.21.8 Protected Silhouettes may be identified where these contribute to a viewer’s ability to recognise and to appreciate the significance and value of particular World Heritage Sites.

5.21.9 In addition to strategic views, London boroughs also define views that are of local importance.

**Figure 5.53 Protected Vistas**



London Plan 2016

**Heritage at Risk**

5.21.10 There are many reasons why heritage assets may be considered at risk; these include development pressure, lack of investment, uncertainty over ownership and responsibility and a lack of understanding of the potential of such assets in delivering economic, social and environmental benefits. The amount of heritage at risk provides one indication as to how

the historic environment is being managed. As shown in the Figure 5.54 from the London Plan Annual Monitoring Report for 2014-15, designated assets at risk from neglect or decay in London in 2015 included 62 conservation areas, 492 listed buildings, 31 scheduled monuments and 9 registered parks and gardens. This makes up 12.2 per cent of the total 5,478 national designated assets at risk. The number of assets at risk in London has reduced since 2014 with 4 fewer designated assets at risk in 2015 than in 2014.

**Figure 5.54 Heritage at Risk - Number and condition of designated heritage assets**

	2011		2012		2013		2014		2015	
	No.	% at risk	No.	% at risk	No.	% at risk	No.	% at risk	No.	% at risk
World heritage sites	4	0	4	0	4	0	4	0	4	0
Listed buildings#	18,745	2.53	18,854	2.8	18,872	2.7	18,896	3	18,936	2.59
Conservation areas	1,000	6.4	949	6.8	1,009	6.3	1,017	6.3**	1,021	6%**
Scheduled monuments	154	22.7	154	22.7	155	20.6	156	19.9	158	19.6
Registered parks and gardens	149	5.4	150	8	150	7.3	150	7.3	150	6
Registered battlefield	1	0	1	0	1	0	1	0	1	0

*English Heritage*


\* designated by UNESCO

# does not include places of worship

\*\* 954 of the 1,021 conservation areas in London have been surveyed through the Conservation Areas at Risk survey and 62, or 6%, are considered 'at risk'.

5.21.11 In terms of decay, acidified air pollutants can accelerate the degradation of valuable buildings, especially cultural monuments such as older sandstone and limestone buildings. Other cultural monuments, such as rune stones and rock carvings, also display evidence of serious damage as a result of acidifying air pollutants.

5.21.12 London is a very dynamic, complex urban environment in which pressure for development is high. Due to this intense pressure, it is often the setting of heritage assets that are at most risk. Whilst all of London's World Heritage Sites are sensitive to development around them, the location of the Tower of London and the Palace of Westminster in the Central Activities Zone means their settings are under significant development pressures with both being opposite Opportunity Areas - Waterloo and London Bridge.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>Heritage assets at risk from neglect, decay, inappropriate development and air pollution</li> <li>Views and vistas to heritage assets are at risk from increased development pressures</li> <li>Potential harm to the significance of heritage assets and wider historic environment through inappropriate development.</li> </ul>
<b>Opportunities</b>	London's heritage assets create the city's sense of place and provide richness in the urban fabric, as well as being an economic asset for the city, attracting tourists, businesses and their employees.
<b>Implications of the plans and programmes review</b>	Conserve and enhance designated and non-designated heritage assets and their settings.
	
<b>Suggested IIA Objectives</b>	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.



## 5.22 Geology and Soils

The natural and man-made geological footprint of land

The variety of rocks, minerals, landforms, and natural processes, such as weathering, erosion and sedimentation that underlie and determine the character of the landscape and issues such as flood management and food-growing.

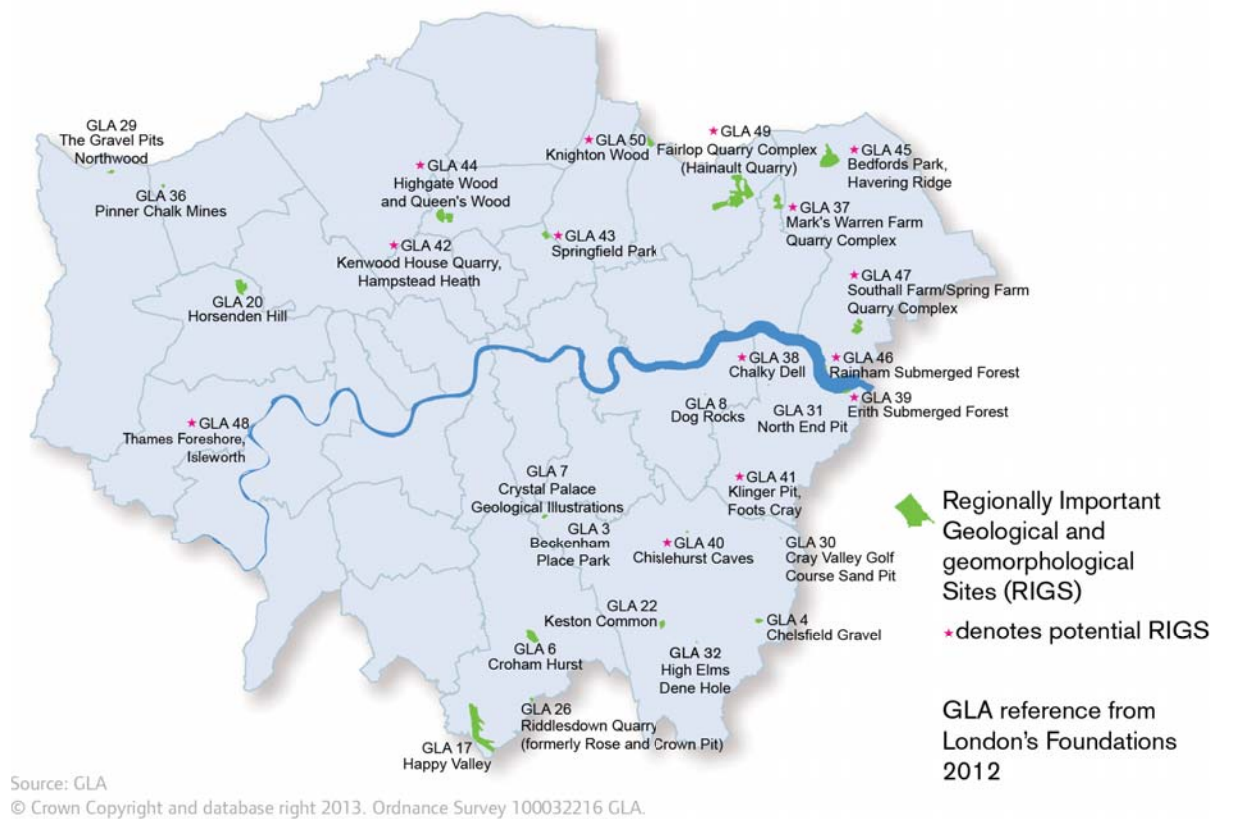
### Geology and geodiversity

- 5.22.1 The underlying geology and the man-made substrates of former buildings and demolition rubble that overlays much of London’s underlying geology can have a profound effect on matters such as sub-surface hydrology and the types of landscapes that can be created, managed and maintained in the urban environment. London has a range of distinctive natural landscapes shaped by geological processes, such as undulating chalk downlands in south London and the river terraces of north London.<sup>218</sup>
- 5.22.2 London’s geological sites are protected through their designation as Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) or Locally Important Geological Sites (LIGS). There are seven geological SSSIs in London including Abbey Wood, Wansunt Pit, Elmstead Pit, Gilbert’s Pit, Harefield Pit, Harrow Weald and Hornchurch Cutting. Four are in favourable condition and three are in unfavourable condition.<sup>219</sup>
- 5.22.3 RIGS complement the SSSIs coverage and are the most important places for geology and geomorphology outside the statutory network. Existing RIGS and potential RIGS in London are shown in Figure 5.55.
- 5.22.4 Sustainable conservation, management and interpretation of London’s underlying geology is important as they provide an important resource for education and research. Understanding underlying geology helps to ensure the development of techniques of construction and land management that ensure the most sustainable approaches to development are taken.

<sup>218</sup> Capita Symonds (2012) London Geodiversity Action Plan 2014-2018

<sup>219</sup> Ibid

Figure 5.55: Regionally Important Geological and geomorphological Sites (RIGS), 2013




Source: GLA  
© Crown Copyright and database right 2013. Ordnance Survey 100032216 GLA.

GLA and London Geodiversity Partnership, 2012

### Soils

- 5.22.5 Soil is a fundamental natural resource and plays an important role in urban areas in supporting food growing, improving drainage and can help shape the quality of London’s green spaces. Soil degradation over time from erosion, organic matter decline, pollution, compaction and direct loss caused by surface sealing by development can result in such important functions being lost. Pressure on soils is likely to increase in the future with expected population growth and needs to be managed carefully during construction and development to avoid further soil degradation.
- 5.22.6 Some soils in London have high levels of contamination from substances that are a legacy of former industry and the incorporation of rubble and waste into soils as a consequence of cyclical regeneration and renewal of London’s built environment. This includes industrial land such as old gas works, chemical plants, oil refineries, petrol stations, metal works and munitions factories as well as former landfills, waste handling and disposal facilities. Contamination can also occur through the use of toxic materials by the transport industry, including fuel and oil spills from motor vehicles, and chemicals used for the preservation of wooden railroad ties.
- 5.22.7 Risk of increased soil degradation is often highest during construction of new developments or infrastructure, for example, through compaction from machinery use and risk of erosion when left exposed to wind and rain.

5.22.8 Some of London’s larger brownfield sites may be contaminated by past land use practices. Contamination can pose a significant risk to human health and the environment; however not all land that is contaminated presents an environmental or human health risk. The real or perceived costs of remedial treatment of land can act as a significant barrier to successful regeneration, particularly if contamination issues and their solutions are not identified early and integrated into the redevelopment of a site. Risks and uncertainty regarding land contamination may inhibit the redevelopment of brownfield land and in some cases this may contribute to long term dereliction. In addition, the costs for remediation can reduce the contribution available for social infrastructure and other obligations such as affordable housing or even require a public subsidy before development can be contemplated. An assessment of the risks associated with developing contaminated or potentially contaminated land is therefore essential to inform decisions about the appropriate level of treatment, clean up or remediation that may be required.

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Threat to London’s geodiversity as a result of increased demand for development</li> <li>• Modifications to the landscape and subsequently geomorphological processes</li> <li>• Remediation of contaminated land</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Focus on prevention and remediation of soil contamination</li> <li>• Co-ordinated approach to bring derelict land back into use with high abnormal costs</li> </ul>
<b>Implications of the plans and programmes review</b>	Identified need to focus on prevention and remediation of environmental damage, including land contamination. Need to increase efforts to reduce soil degradation and remediate contaminated sites.
	
<b>Suggested IIA Objectives</b>	To conserve London’s geodiversity and protect soils from development and over intensive use

## 5.23 Materials and Waste

**Materials** - new and used, suitable for the design, build, and operation of products, assets and infrastructure. These include primary raw materials such as aggregates and minerals as well as manufactured, reused, recycled and re-manufactured products

**Waste** – discarded materials substances or objects which have no further use in their present form that are prepared for reuse or recycling ahead of disposal. Disposal is the only option for some hazardous or contaminated wastes materials.

**Circular economy** - An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of ‘make, use, dispose’.

5.23.1 Waste is currently defined as anything that is discarded. In 2012 London produced c.15 million tonnes (mt) of waste and this comprised:

- 3.0mt (20 per cent) is Local Authority Collected Waste (LACW – also referred to in the London Plan as Household waste) – collected by or on behalf of London boroughs and disposed of by boroughs individually or collectively
- 4.7mt (32 per cent) is Commercial & Industrial Waste (C&I) waste from shops/offices/ restaurants – collected and disposed of by private sector waste contractors.
- 7.2mt (48 per cent) is Construction, Excavation and Demolition Waste (CE&D) – waste generated by development activity, and collected and disposed of by private sector waste companies<sup>220</sup>

5.23.2 Undertaking waste research for the GLA in 2014, SLR Consulting<sup>221</sup> found that in 2012 London was:

- dealing with almost half of its own waste within its boundaries
- exporting 7.97mt of waste, of which 3.95mt (49 per cent) went to landfill – 2.05 to landfill sites in the South East and 1.84mt to East of England

### Wasteful economy increasing cost and environmental impact

5.23.3 Landfilling waste is expensive (£100 per tonne, £84 of which is the landfill tax rising to £86 from April 2017), unpopular with those receiving it (particularly in the South and South East) and increasingly a short-medium term solution. Landfills receiving London’s waste are expected to close by 2025 and they are not being replaced. London’s local authority collected waste sent to landfill and incineration in 2013/14 produces around 252,000 tonnes of lifecycle CO<sub>2</sub>eq emissions. Alternatively London’s waste sent for recycling that year saved 95,000 tonnes of lifecycle CO<sub>2</sub>eq emissions, as a result of avoiding emissions that would have otherwise happened from manufacturing original materials.<sup>222</sup>

5.23.4 The cost of managing London’s waste is estimated to be more than £2b per year, including

<sup>220</sup> Mayor of London, London Plan Annual Monitoring Report 2014/15

<sup>221</sup> SLR, Global Environmental Solutions – Waste Arising Study Review for the Revised London Plan, 2014

<sup>222</sup> Greenhouse gas emissions performance standard for London’s local authority collected waste – 2014/15 update, GLA April 2016.

around £720m on managing waste in the control of local authorities.<sup>223</sup> Waste costs are expected to increase without a step change in waste reduction and performance improvement in recycling. London's waste presents significant economic and social opportunities. Managing more waste locally by optimising existing waste facilities and building new reuse and recovery facilities, can deliver benefits to local communities in the form of new products, employment and low carbon energy. Research<sup>224</sup> undertaken for the GLA and the London Waste and Recycling Board (LWARB) estimate London transitioning to the circular economy through waste reduction and significant improvement in reuse and recycling performance could bring £7bn of benefits to London and generate 12,000 new jobs by 2036.

#### Increasing demand for land putting waste sites at risk

- 5.23.5 Waste sites are safeguarded under London Plan policy, however many are at risk due to increasing demand for other land uses in particular for new housing, particularly in north and east London. Between 2010 and 2015, a total of 525ha of industrial land was transferred to other uses or 105ha per annum compared with the London Plan/SPG recommended rate of release of 36.6 ha per annum.<sup>225</sup> Loss of industrial land in excess of London Plan release benchmarks could have impact on long term strategic site availability for managing waste.
- 5.23.6 This is best understood by viewing the London waste map by overlaying the planned Housing zones and Opportunity Area at <https://maps.london.gov.uk/webmaps/waste/>. Some sites have already been lost housing development with replacement capacity elsewhere yet to be found. Identifying and safeguarding sites for waste allows for local waste management solutions to be found, including opportunities for reorientation and intensification to maximise these assets and free up underutilised sites for other uses. Boroughs cannot be forced to use these, particularly if more affordable solutions exist elsewhere.

#### Low recycling performance against stretching recycling targets

- 5.23.7 London's recycling rate for local authority collected waste has increased steadily from 2002 to 2012, reaching 30 per cent in 2012 and remaining therefore the past four years against a 2015 target of 45 per cent. This is the lowest in England (average 44 per cent).<sup>226</sup> Recycling performance in flats is particularly low, estimated to be around 10 per cent.
- 5.23.8 London did not meet the Mayor's 45 per cent municipal waste recycling performance by 2014/15 and will need significant improvement to meet targets to recycling 50 per cent by 2020 and 60 per cent by 2030. A number of contributing factors have been identified for this performance including;
- London being a highly diverse and transient city which can make communicating recycling services difficult
  - There are 33 waste collection authorities each delivering their own set of services depending on specific circumstances. This can make things confusing particularly when residents move between boroughs

<sup>223</sup> GLA Waste modelling 2016/17. Data available on request.

<sup>224</sup> Towards a circular economy, LWARB 2015 and Employment and the circular economy – job creation through resource efficiency in London, LWARB 2015. Accessed at <http://www.lwarb.gov.uk/what-we-do/accelerate-the-move-to-a-circular-economy-in-london/>

<sup>225</sup> AECOM "Industrial Land Supply and Economy Study 2015", published GLA March 2016

<sup>226</sup> Local authority waste statistics: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

- London is a rapidly growing city against a backdrop of limited suitable available space for new housing. Around half of the housing stock is high rise flatted accommodation with limited easily accessible storage space for recycling compared to separate households served by kerbside collection services
- London has less garden space than other regions, producing less garden waste that could contribute to recycling performance
- A continued focus on weight based recycling targets becoming harder to reach with light weighting of materials and less paper in the waste stream with an increasing transition from the paper to digital economy.

- 5.23.9 The Mayor is not a waste planning authority, a waste collection authority or a waste disposal authority. In London, these statutory responsibilities lie with boroughs, either individually or acting together jointly, and with statutory waste disposal authorities. However, the Mayor is able to exercise strategic oversight through ensuring that:
- borough waste strategies and contracts are in general conformity with his Mayor's Municipal Waste Management Strategy
  - borough waste plans are in general conformity with the London Plan
  - waste facilities generating energy from waste meet the Mayor's London Plan carbon intensity floor policy
- 5.23.10 The Mayor's powers to directly influence waste contracts are limited to the boroughs' contracts for LACW which should be in general conformity with the Mayor's Municipal Waste Strategy. Waste contracts do not respect administrative boundaries and waste flows across boundaries (some of London's waste is currently dealt with in Germany and the Netherlands). Waste contracts are regulated under EU procurement open market rules, awarded on cost and frequently let for long periods. In practice, Mayoral intervention focusses on whether contracts support achievement of the Mayor's reduction, recycling and CO<sub>2</sub> reduction targets – not regional self-sufficiency targets. The Mayor chairs the London Waste and Recycling Board (LWARB). He can influence waste management in London by helping to fund new facilities in London, supporting borough recycling initiatives and spreading best practice.
- 5.23.11 London Plan Policy 5.16 sets these recycling targets:
- LACW – exceeding 45 per cent recycling/composting levels by 2015, 50 per cent by 2020 and aspiring to reach 60 per cent by 2031
  - C&I – exceeding 70 per cent recycling/composting levels by 2020
  - CE&D – exceeding 95 per cent recycling and reuse by 2020
- 5.23.12 Current waste recycling performance (2014/15) is:
- LACW – 34 per cent
  - C&I – 52 per cent
  - CE&D – 85 per cent
- 5.23.13 The Mayor's 65 per cent recycling target by 2030 will be met if the current London Plan's 2031 targets of 60 per cent LACW and 70 per cent C&I are fulfilled. To achieve this it will be necessary to retain the focus on boosting recycling performance through local authority and commercial waste services, and to ensure that London has sufficient waste infrastructure it can access both in and outside of London.

### Waste Apportionment


- 5.23.14 Waste apportionment is a long-standing waste planning methodology which recognises that for any given area, waste arisings (the amounts of waste produced) do not always match the land available for waste management (processing, transferring, landfilling). This mismatch is particularly acute in London. Waste apportionment in the current London Plan redistributes waste to be managed around the capital, in effect shifting the balance of waste management activity from central/inner to outer London. Before apportionment can take place, arisings for LACW and C&I are calculated, and the London totals are then distributed along sustainability principles through an apportionment model to each borough for each milestone year. Arisings expected to increase with major construction projects including Crossrail 2, Thames Tideway Tunnel, Bakerloo line extension as well as Opportunity Areas and 31 Housing Zones. To support this process, London Plan Policy 5.17 Waste Capacity requires boroughs (individually or in partnership with others) to allocate sufficient sites to deal with their apportionment – and not their arisings.
- 5.23.15 The Government's policy approach to waste apportionment has changed recently. In October 2014, PPS10 (previous national guidance on waste) was rescinded and replaced by the National Planning Policy Framework (NPPF) and its attendant National Planning Practice Guidance (NPPG). For London, the NPPG's approach to waste is more subtle than that of the PPS, with apportionment no longer set as an absolute requirement. Boroughs still have to plan for the management of their waste but are instead advised to 'have regard' to London Plan apportionments. Boroughs' local waste plans will still need to be in general conformity with the London Plan. In addition, Government guidance now expects waste planning authorities to allocate sufficient land to deal with a much wider set of waste streams, seven in total (up from two) – LACW, C&I, CD&E, Hazardous, Waste Water, Low level Radioactive and Agricultural.
- 5.23.16 The London Plan's existing apportionment methodology was developed in 2006 by Jacobs for the GLA and has remained unchanged since – that is to say recent iterations of the Plan have held steady the proportion of London's waste apportioned to each borough, though the actual tonnages apportioned have been refreshed each time in line with updated arisings data. It has been agreed updated arisings forecasts for the LAC, C&I, CD&E and Hazardous waste streams should be prepared for the new London Plan, and these four waste streams should be considered to be apportioned through an updated apportionment model. A technical brief has been prepared for this work, and procurement is underway (December 2016).
- 5.23.17 In his manifesto the Mayor states he sees waste as "an opportunity to create jobs in reuse, repair, re-manufacturing and materials innovation". It is considered that 'Circular Economy' principles are a good match for meeting, and even exceeding, the Mayor's aspirations in this field. Under a Circular Economy, materials and assets are kept at their highest value at all times for as long as possible – and waste is avoided through sourcing reused and reusable materials. The potential benefits of a Circular Economy extend far wider than waste reduction to include job creation, economic growth and carbon reduction.

### Non-efficient movement of freight

- 5.23.18 Almost 90 per cent of all freight lifted in London is moved by road, with river (5.3 per cent), rail (4.3 per cent) and air (1.1 per cent) transport accounting for the remainder. However, rail and water transport are being increasingly used for the excavation of material from major transport infrastructure projects in London. Crossrail aims to ensure that 85 per cent of the excavated material is transported by rail or water. The Lee Tunnel sewage project is also making use of river transport for excavated material as well as the Thames Tideway sewage project.<sup>227</sup>
- 5.23.19 Freight activity across London has been increasing. By 2014, LGV vehicle kilometres and HGV vehicle kilometres were 20 per cent and 4 per cent higher respectively than they were in 1994-1999. This growth is expected to continue.<sup>228</sup>
- 5.23.20 Key factors leading to increased freight vehicle kilometre include:
- Increased business-to-customer (e.g. e-commerce and click and collect etc.) deliveries;
  - Increased business-to-business (e.g. just-in-time) deliveries which has reduced stock-holding capacity;
  - Reduced number of distribution centres due to release of industrial land to other uses;
  - Relocation of freight / logistic hubs to areas with good highway accessibility e.g. motorway hubs / M25;
  - Growth in sub-contracting / self-employment due to industry fragmentation of supply chain to create more flexible and agile supply chains;
  - Lengthening of supply chains as a result of broadened customer demand for choice.
- 5.23.21 These trends are expected to continue, and unless other measures are undertaken to reduce freight vehicle kilometres (e.g. consolidation of practices, substitution of postal deliveries, new methods of delivery), London will see an increase freight traffic and a higher proportion of van traffic resulting in less efficient utilisation of road capacity, greater road congestion (and costs) and further worsening of air quality issues.

<sup>227</sup> University of Westminster (2014) London Freight Data Report: 2014 Update. Prepared by Julian Allen, Michael Browne and Allan Woodburn for Transport for London. 1 December

<sup>228</sup> University of Westminster (2014) London Freight Data Report: 2014 Update. Prepared by Julian Allen, Michael Browne and Allan Woodburn for Transport for London. 1 December

<b>Key issues</b>	<ul style="list-style-type: none"> <li>Increasing pressure on waste sites and infrastructure including wharves in London to meet demand</li> <li>Wasteful economy increasing disposal costs and climate change impact</li> <li>Low municipal waste recycling rate and inconsistent recycling service provision falling short of stretching recycling targets</li> <li>Fragmented waste governance resulting in inconsistent recycling service provision and performance across London</li> <li>Likely increase in waste arisings in particularly construction materials to meet the needs of London’s growing population</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Reducing waste and increasing recycling performance will lower London’s waste management bill and environmental impact</li> <li>Managing waste more locally by optimising existing facilities and building new reuse and recovery facilities, will deliver benefits to local communities in the form of new products, employment and low carbon energy.</li> </ul>
<b>Implications of the plans and programmes review</b>	A need to apply principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling in all construction and operational practices. Review of London’s waste management capacity projected alongside expected waste arisings to inform infrastructure gaps and need.
	
<b>Suggested IIA Objectives</b>	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates

## 5.24 Noise and Vibration

Unwanted sound and vibration that causes disturbance

- 5.24.1 There is no single definition of noise. Noise can be defined as unwanted sound. Ironically, it is often referred to as the silent polluter in that its effects can be hard to establish. This is because the problem is psychological: differences in perception such as the type or loudness of music.
- 5.24.2 Noise disturbance can be associated with health impacts such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in children. The adverse impacts of that stress are clearly documented, resulting in higher rates of cardiovascular disease and deteriorating mental health.
- 5.24.3 A level of 57dB represents the ‘onset of significant community annoyance’ and in London alone two million people (42 per cent of the population) are exposed to more than 55dB<sub>Lden</sub>.<sup>229</sup> Different groups of people are affected differently, for example younger people are differentially affected by noise, particularly at night, as they spend more time in bed than older people.
- 5.24.4 Three types of noise are defined in the Noise Policy Statement for England (NPSE) (March 2010). These are:
- environmental noise - which includes noise from transportation sources;
  - neighbour noise - which includes noise from inside and outside people’s homes; and
  - neighbourhood noise - which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street.
- 5.24.5 London is becoming an increasingly noisy city .The main source of ambient noise in London is road traffic, followed by rail. In urban areas, most vehicle noise comes from engines because, at low speed, engine noise dominates over the noise generated by tyres and road surfaces. However other activities such as construction, busy high streets, or a greater vibrant night time economy will also impact noise levels.
- 5.24.6 Figure 5.56 identifies the number of people exposed to roadside and railway noise above the threshold in London in 2011.

**Figure 5.56: Number of people exposed to roadside and railway noise above threshold in London, 2011**

Type	>55dB	>65dB	>75dB
Roadside	2,378,200	1,027,200	99,200
Roadside – night	1,665,400	649,400	900
Railway	252,200	158,100	15,200

<sup>229</sup> GLA Economics (2016) Economic Evidence Base


Type	>55dB	>65dB	>75dB
Railway – night	388,700	95,100	6,400

Defra

- 5.24.7 Respondents to the TfL Perceptions of the Travel Environment Survey (2012) were asked to consider noise generated from different transport modes in their area, the extent to which they are disturbed by transport-related noise and the impact this has on their quality of life. In general, satisfaction with the level of transport related noise has shown a steady increase over recent years; achieving a mean satisfaction rating of 76 out of 100 in 2012. There has also been a significant increase in the proportion of Londoners giving a very high satisfaction rating; this is up from 31 per cent in 2011 to 35 per cent in 2012. However, the most common cause of noise disturbance remains road traffic, with 41 per cent of Londoners disturbed by this in 2012.
- 5.24.8 Aviation noise also affects many people in London. A 2013 report from TfL noted that 766,100 people lived within the ≥55 Lden contour of Heathrow and at least another 17,800 people living within the ≥55 Lden contour of London City airport. This indicates that aviation noise is a significant environmental issue in London.<sup>230</sup> The number of flights, particularly at night, can affect people’s experience of uncomfortable levels of noise.
- 5.24.9 In August 2016 TfL launched the 24 hour tube and there are plans to extend these to other parts of the network. This will introduce noise at times of the day that were previously less noisy, potentially impacting on sleep patterns for some residents.
- 5.24.10 The Environmental Noise (England) Regulations 2006 require Defra to produce noise action plans for large urban areas. Defra established a procedure by which boroughs could approach them to designate quiet areas in their boroughs. Consultation with the Mayor is not required so the Mayor would be unaware if any boroughs approach Defra to define quiet areas. Providing residents with quiet areas will reduce stress levels and improve mental health and it will be a function of the planning system to ensure that any designated or candidate quiet areas retain this characteristic as new development comes forward.
- 5.24.11 Changes of land uses will result in different patterns of noise. Between 2001 and 2015 1,306ha of industrial land was lost (16 per cent of the total) to other uses (residential, offices, retail, leisure etc).<sup>231</sup> These newer uses are often less ‘noisy’ than what was there previously. However, complaints about noise tend to rise due to the proximity of competing uses. Considering the environment into which new development will be located is an important function of the planning system and noise will obviously be a key determinant. Solutions such as triple glazing and sealed windows may ‘solve’ the problem but could offer poor residential amenity to new residents. The NPPF (March 2012, para 123) is clear that existing businesses should not “have unreasonable restrictions put on them because of changes in nearby land uses since they were established.”

<sup>230</sup> Ibid

<sup>231</sup> AECOM Industrial Land Supply and Economy Study 2015, published GLA March 2016

<b>Key issues</b>	<ul style="list-style-type: none"> <li>• Parts of the population are exposed to roadside and railway noise that exceeds the threshold</li> <li>• Increasing noise levels from night time economy, freight movement and deliveries associated with mixed use development</li> <li>• Lack of quiet and tranquil places for relaxation and enjoyment</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• Reduce number of people exposed to high levels of noise from roads, railways and aircraft</li> <li>• Use of insulation to reduce noise disturbance</li> <li>• Minimise locating noisy activities adjacent to noise sensitive receptors</li> </ul>
<b>Implications of the plans and programmes review</b>	A need to minimise noise and vibration levels and the number of people exposed to high levels of noise from development, activities and use.
	
<b>Suggested IIA Objectives</b>	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure

## Appendix C

### Context Review





## SUMMARY OF THE MOST RELEVANT PLANS AND PROGRAMMES

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Social Integration and Inclusion</b>	Equality Act 2010	This Act brings together over 116 separate pieces of legislation providing a legal framework to protect the rights of individuals and advance equality of opportunity for all.  Requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities; requiring the assessment of emerging strategies policies and programmes' impact on equality and consider what actions, if any, may be appropriate to improve upon any identified adverse impacts.	Ensure that potential impacts on all protected characteristics are taken into account in developing the IIA Framework  <b>IIA Objectives 1, 2</b>
<b>Social Integration and Inclusion</b>	GLA's Equal life chances for all (revised 2014)	Sets out an approach that aims to bring Londoners together rather than dividing them. The framework promotes outcomes which will be delivered through the Mayoral Strategies.	Ensure that the framework and the strategies objectives are reflected throughout the IIA framework.  <b>IIA Objectives 1, 2</b>
<b>Health and Health Inequalities</b>	National Planning Policy Framework (March 2012)	Paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. It sets out the key priorities in achieving healthy communities in regards to access to open space, social infrastructure, safe and accessible environment, etc.	Ensure the range of objectives in the promotion of healthy communities is reflected in the IIA Framework.  <b>IIA Objective 3</b>
<b>Health and Health Inequalities</b>	Child Obesity Plan (2016)	National plan to reduce child obesity through improved diet and increasing physical activity.	Ensure that the objectives are reflected in the IIA framework.  <b>IIA Objective 3</b>
<b>Health and Health Inequalities</b>	London Health and Care Collaboration Agreement and London Devolution Deal (2015)	Sets out an ambition for transformation of health in London and agreement to explore devolution in key areas, including prevention, integration and NHS estates.	Ensure that the objectives are reflected in the IIA framework.  <b>IIA Objective 3</b>
<b>Health and Health Inequalities</b>	Better Health for London: next steps 2014	Sets out ten ambitions to make London the healthiest world city, shared by the Mayor of London, Public Health England, NHS England, London Councils and the Office for London CCGs.	Ensure that the objectives are reflected in the IIA framework.  <b>IIA Objective 3</b>
<b>Health and Health Inequalities</b>	Mayors Health Inequality Strategy Delivery Plan 2015-2018 Indicator Report	Sets out indicators of health inequalities in London which will be published annually.	Ensure that the objectives / indicators are reflected in the IIA framework where relevant.  <b>IIA Objective 3</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Health and Health Inequalities</b>	The London Health Inequalities Strategy (2010)	Sets out a framework focusing on improvement of physical health and mental well-being of all Londoners.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 3</b>
<b>Crime, Safety and Security</b>	Crime and Disorder Act 1998	The Act obliges local authorities, the police and other local bodies to draw up crime and disorder strategies covering their areas – including created an Anti-Social Behaviour Order as well as creating a number of other new orders and offence types.	Ensure provisions are taken in to account in the development of the IIA Framework.  <b>IIA Objective 4</b>
<b>Crime, Safety and Security</b>	Police and Justice Act 2006 (as amended)	The Act established the National Policing Improvement Agency (NPIA). The NPIA is no longer in existence and its functions have been transferred to a number of agencies including the Home Office, the Serious Organised Crime Agency and the College of Policing. The Act also grants the Home Secretary additional powers to intervene over underperforming police forces, allows the police to impose electronic tags and curfew restrictions on granting conditional bail and permits the Home Secretary authority to widen the list of professions allowed to issue Fixed Penalty Notices.	Ensure provisions are taken in to account in the development of the IIA Framework.  <b>IIA Objective 4</b>
<b>Crime, Safety and Security</b>	National Planning Policy Framework (March 2012)	Paragraph 58 requires planning policy to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.	Reflect objectives in the IIA Framework.  <b>IIA Objective 4</b>
<b>Crime, Safety and Security</b>	Mayor's Office for Policing and Crime's (MOPAC) Police and Crime Plan 2013-16 (March 2013)	Sets out the Mayor's priorities for policing.	Reflect objectives and priorities in the IIA Framework.  <b>IIA Objective 4</b>
<b>Crime, Safety and Security</b>	Mayor's Safer Streets for London Plan (2013)	Sets challenging targets to reduce the number of KSIs by 40 per cent by 2020 from a baseline 2005 – 2009 average. Reducing injuries on the Capital's roads, as a result of criminal and ASB is one way to contribute to achieving this target.	Reflect targets in the relevant indicators in the IIA framework.  <b>IIA Objective 4</b>
<b>Crime, Safety and Security</b>	London Assembly Police and Crime Committee report, Policing the Night-Time Economy (March 2016)	Assesses the challenges associated with policing London's growing Night time Economy. The report makes a number of recommendations, including: <ul style="list-style-type: none"> <li>MOPAC should lobby the Home Office for the introduction of a national definition of 'alcohol-related' crime.</li> <li>MOPAC should examine whether changes to licensing arrangements in London could alleviate any identified pressure on policing.</li> <li>The Met Police and MOPAC should review the demand that the NTE places, and will place in the future, on borough-based policing.</li> <li>NHS England should press for the sharing of information between London hospitals and the Met to be a mandatory requirement, to help inform crime reduction responses.</li> </ul>	Reflect challenges in the IIA assessment framework  <b>IIA Objective 4</b>
<b>Housing</b>	Housing and Planning Bill (DCLG 2015/16)	Through this Act, the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home, and ensure the way housing is managed is improved.	Reflect on implications of proposals in the IIA Framework.  <b>IIA Objective 5</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Housing	National Planning Policy Framework	Paragraphs 46 – 53 sets out how local authorities should ensure an appropriate supply and choice of housing to meet their needs.	Reflect guidance in the IIA Framework <b>IIA Objective 5</b>
Housing	Outer London Commission Sixth Report: Barrier to Housing Delivery (March 2016)	The report sets out an analysis of barriers to housing delivery in London and sets out 14 recommendations that collectively could help to boost housing delivery in London.	Reflect recommendations of report in IIA Framework <b>IIA Objective 5</b>
Housing	Outer London Commission Seventh Report: Accommodating Report (March 2016)	The report suggests that in developing a new London Plan, the Mayor should take a threefold approach to accommodating growth through: <ul style="list-style-type: none"> <li>• greater efficiencies in the way existing capacity is used;</li> <li>• sustainable intensification of selected parts of the city; and</li> <li>• partnership working to realise the potential of the wider metropolitan region</li> </ul>	Reflect recommendations of report in IIA Framework <b>IIA Objectives 5, 6</b>
Housing	GLA Equal life chances for all (revised 2014)	Sets out an approach that aims to bring Londoners together rather than dividing them. The framework promotes outcomes for a diverse range of communities and seeks to bring real changes to the quality of life for all Londoners, and sets out additional guidance and principles on how the objectives of the Mayors Equality framework should be met.	Ensure that the framework and the strategies objectives are reflected throughout the IIA framework. <b>IIA Objectives 1, 5</b>
Housing	GLA Housing Strategy 2014	The Strategy sets out a range of proposals to increase housing delivery across all tenures and improve the housing offer for working Londoners. It includes proposals to provide the long-term stable funding necessary to deliver new homes; to bring land forward for development; and to reinvigorate the housing market by attracting new players (including smaller house builders) to better meet the needs of a growing city.	<b>IIA Objective 5</b>
Sustainable Land Use	National Planning Policy Framework (March 2012)	Paragraph 6 and 7 set out the three dimensions to sustainable development: economic, social and environmental, and makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development.	Reflect objectives of NPPF in the IIA Framework. <b>IIA Objective 6</b>
Sustainable Land Use	Airport Commission's Final Report July 2015	Sets out the Airport Commission's analysis and recommendations to the Government of different options for expanded airport capacity in the South East of England.	Reflect potential implications of recommendations in the report in the IIA Framework. <b>IIA Objectives 6, 9, 11</b>
Sustainable Land Use	Outer London Commission's 7th Report: Accommodating London's Growth	The report suggests that in developing a new London Plan, the Mayor should take a threefold approach to accommodating growth through: <ul style="list-style-type: none"> <li>• greater efficiencies in the way existing capacity is used;</li> <li>• sustainable intensification of selected parts of the city; and</li> <li>• partnership working to realise the potential of the wider metropolitan region</li> </ul>	Reflect recommendations of report in IIA Framework. <b>IIA Objectives 5, 6, 10</b>
Accessibility	National Planning Policy Framework (March 2012)	Paragraph 61 states that securing high quality and inclusive design goes beyond aesthetic considerations.	<b>IIA Objectives 7, 8</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Accessibility	GLA Equal life chances for all (revised 2014)	Sets out an approach that aims to bring Londoners together rather than dividing them. The framework promotes outcomes for a diverse range of communities and sets out objectives based on a range of indicators.	Ensure that the strategies objectives are reflected throughout the IIA framework <b>IIA Objectives 1, 8</b>
Accessibility	The London Health Inequalities Strategy (2010)	Sets out a framework focusing on improvement of physical health and mental well-being of all Londoners.	Ensure that the objectives of the Strategy are reflected in the IIA framework. <b>IIA Objectives 3, 8</b>
Accessibility	Your accessible transport network (May 2015 update)	Sets out the Mayor's commitment to making it easier for older and disabled people to travel in London, setting out a range of short and long term commitments to improving transport infrastructure, customer service and information, staff training and stakeholder communication in order to make journeys easier.	Give due consideration to how the plan can contribute to the objectives and targets of the programme. Ensure that the requirements of the programme are reflected in the IIA framework. <b>IIA Objective 8</b>
Connectivity	National Planning Policy Framework (March 2012)	Sets out a range of policies to improve connectivity. Paragraph 25 sets out the importance of sustainable transport modes, giving people a real choice about how they travel which has a range of sustainability benefits including economic prosperity. Paragraphs 42 highlights the importance of advanced, high quality communications infrastructure for sustainable economic growth.	Ensure priorities are reflected in IIA Framework <b>IIA Objectives 9, 11</b>
Connectivity	Airport Commission's Final Report July 2015	Sets out the Airport Commission's analysis and recommendations to the Government of different options for expanded airport capacity in the South East of England.	Reflect potential implications of recommendations in the report in the IIA Framework. <b>IIA Objectives 9, 11</b>
Connectivity	Freight: 2010-2015 Government Policy (DfT)	An efficient freight transportation system helps support the UK economy. Getting goods from one place to another at a reasonable cost and with the minimum impact on the environment and communities is essential. Government is working with the freight industry to help them cut costs and reduce greenhouse gas emissions. Effective and proportionate regulation will also ensure goods are moved safely and securely across the UK and abroad.	Ensure priorities are reflected in IIA Framework <b>IIA Objectives 9,11, 23</b>
Connectivity	Rail Network 2010-2015: Government Policy (DfT)	Rail is vital to the UK's economic prosperity. If rail services are inefficient and do not meet people's needs for routing or frequency, business and jobs suffer. Rail links with airports and ports are business opportunities for travel, tourism and the transportation of goods. Encouraging people to use trains rather than cars, and reducing carbon emissions from trains and stations themselves, can also contribute to the UK's carbon reduction targets.	Ensure priorities are reflected in IIA Framework <b>IIA Objectives 9, 11</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Connectivity	London Infrastructure Plan – update 2015	Sets out a long term plan for delivering London’s physical infrastructure and the importance of it for London ‘s global competitiveness.	Ensure that the priorities are reflected in the IIA framework. <b>IIA Objectives 9, 11</b>
Connectivity	Local Transport 2010 to 2015 Government Policy (DfT, 2015)	Summary of Government policy on local transport including: reducing the need to travel, funding mechanisms; increasing the use of buses; taxis; and encouraging people to cycle.	Ensure that the priorities are reflected in the IIA framework. <b>IIA Objectives 9, 11</b>
Connectivity	Connecting the Capital (TfL, 2015)	This document sets out the case for new river crossings to better connect the Capital and cater for future growth including: • Pedestrian and cycle crossings • Ferry services • Public transport crossings • Road crossings	Ensure that the priorities are reflected in the IIA framework <b>IIA Objectives 9, 11</b>
Connectivity	More residents more jobs? 2015 update Oct 2015	This paper investigates the relationship between employment density, population density and levels of transport accessibility in London.	Ensure that the findings are reflected in the development of the IIA framework . <b>IIA Objective 9</b>
Economic Competitiveness	Fixing the foundations: creating a more prosperous nation (July 2015)	Sets out a number of policies and proposals for raising productivity in the UK with its central ethos being that through greater productivity comes improved prosperity and quality of life for all. Its proposals are built around two ideas of encouraging long-term investment in economic capital, including infrastructure, skills and knowledge; and promoting a dynamic economy that encourages innovation and helps resources flow to their most productive use.	Ensure that the priorities are reflected in the IIA framework <b>IIA Objective 10</b>
Economic Competitiveness	National Planning Policy Framework (March 2012)	Paragraph 19 to 21 sets out that in order to achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century; setting out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.	Ensure that the priorities are reflected in the IIA framework <b>IIA Objective 10</b>
Economic Competitiveness	Jobs and Growth Plan for London. GLA (2013)	Tasked with advising the Mayor on jobs and growth, the London Enterprise Panel identified four key priorities: • skills & employment: to ensure Londoners have the skills to compete for and sustain London’s jobs; • small & medium sized enterprises: to support and grow London’s businesses; • science & technology: for the capital to be recognised globally as world leading hub; for science, technology and innovation – creating new jobs and growth; and • infrastructure: to keep London moving and functioning.	Ensure that the priorities are reflected in the IIA framework <b>IIA Objectives 10, 12</b>
Economic Competitiveness	Outer London Commission 7th Report: Accommodating London’s Growth March 2016	The report suggests that in developing a new London Plan, the Mayor should take a threefold approach to accommodating growth through: • greater efficiencies in the way existing capacity is used; • sustainable intensification of selected parts of the city; and • partnership working to realise the potential of the wider metropolitan region	Ensure that the priorities are reflected in the IIA framework <b>IIA Objectives 6, 10</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Economic Competitiveness	London Infrastructure Plan update 2015	The report considers a demand for a wide range of infrastructure types - transport, green, digital, energy, water and waste.	Ensure that the priorities are reflected in the IIA framework <b>IIA Objectives 10, 11</b>
Economic Competitiveness	London in comparison with other global cities August 2016	The report sets out a comparison of London’s economy with other global cities – main findings include: • London has grown at a faster rate than other Western cities like New York and Paris in real terms between 2006 and 2014. However, emerging global cities such as Shanghai and Singapore have seen rates of growth that were twice as fast. • London’s economy is predominantly services drive • labour productivity - London has some of the lowest estimates of output per job and output per hour. Whilst average rates of productivity growth in London were similar to other Western global cities, they were weaker than emerging global cities like Singapore.	Ensure that findings are reflected in the development of the IIA Framework <b>IIA Objective 10</b>
Economic Competitiveness	The changing spatial nature of business and employment in London Feb 2016	This paper looks at how trends in business and employment have changed over time its main findings include overall, London continues to be a net contributor of firms and employment to the rest of the UK economy through outward migration; London continues to specialise in the Information & Communication; Finance & Insurance activities; and Professional, Scientific and Technical activities sectors. However, the extent of the specialisation appears to have diminished a little between 2004 and 2013.	Ensure that findings are reflected in the development of the IIA Framework <b>IIA Objective 10</b>
Economic Competitiveness	London’s Digital Economy Jan 2012	This report draws together a variety of data sources to highlight London’s position in the digital arena. The report looks at uptake and use of digital technologies by businesses and households. Amongst the findings are: • There are over 23,000 ICT and software companies in London – the highest number of any European city. • UK broadband services enable users to “comfortably enjoy” the latest web applications but still lag somewhat behind the best in the world, such as those in South Korea, Hong Kong and Japan.	Ensure that the priorities are reflected in the IIA framework <b>IIA Objectives 10, 11</b>
Economic Competitiveness	Growing Together II: London and the UK economy Sept 2014	This report looks at London’s relationship and impact on the UK’s economy. Main findings include • London’s success is positive for the UK as a whole. • Constraining London’s growth (through reduced infrastructure expenditure for example) will reduce UK growth and threatens London’s international competitiveness – most likely benefiting other countries (not the rest of the UK). • Attempts to ‘share out’ London’s business activities across the UK, by whatever means, would most likely lead to businesses losing the benefits of locating in London; as a result they’d likely relocate to another international city – not the rest of the UK.	Ensure that findings are reflected in the development of the IIA Framework <b>IIA Objective 10</b>
Employment	London’s changing economy since 2008 Oct 2015	This report looks at London economy since 2008. London’s growth since 2008 has been stronger than the UK’s. Jobs growth has been particularly strong however productivity – output per workers has not kept up.	Ensure that findings are reflected in the development of the IIA Framework <b>IIA Objective 10</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Employment	Part-time employment in London Jan 2015	The report analyses changes in the profile of part-time jobs since 2008 – with the growth in London’s part-time jobs exceeded that of the UK overall, although is still lower than in the UK overall. Differing industries and occupational mixes within the London and the UK economies are only part of the explanation. This gap is driven by differences in employment rates amongst women, particularly those working part-time; and the gap is even starker when comparing women with dependent children.	Ensure that findings are reflected in the development of the IIA Framework  <b>IIA Objectives 1, 10</b>
Employment	Patterns of low pay July 2012	This report found that wage inequality in the UK has decreased slightly since the late 1990s, while wage inequality in the capital has increased significantly. This reflects above all an increase in wage dispersion among men.	Ensure that findings are reflected in the development of the IIA Framework  <b>IIA Objectives 1, 10, 12</b>
Education and Skills	GLA Equal life chances for all (revised 2014)	Sets out an approach that aims to bring Londoners together rather than dividing them. The framework promotes outcomes for a diverse range of communities and seeks to bring real changes to the quality of life for all Londoners, and sets out additional guidance and principles on how the objectives of the Mayors Equality framework should be met.	Ensure that the framework and the strategies objectives are reflected throughout the IIA framework.  <b>IIA Objectives 1, 12</b>
Education and Skills	Mayor’s Academic Forum Recommendations 2015	Sets out a series of recommendations which bear on how the London Plan might impact of higher educations: <ul style="list-style-type: none"> <li>• future student numbers</li> <li>• concentration/dispersal of student housing</li> <li>• affordable student housing</li> <li>• meeting strategic and local need</li> <li>• quality of student housing</li> <li>• partnership working</li> </ul>	Ensure that findings are reflected in the development of the IIA Framework  <b>IIA Objective 12</b>
Culture	World Cities Culture Report 2015 – measures and cultural assets	A detailed report centred on culture, providing global insights and statistics, which elaborate on how important culture is for a city. Including ways to make cities more vibrant, inclusive and liveable and how important it is for culture to be incorporated in urban policy, which tends to be vulnerable when budgets are cut.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objectives 10, 13</b>
Culture	Culture White Paper (March 2016)	The paper sets out a strategic vision for culture that promotes increased access for all, empowers communities and promotes increased international standing for culture.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	Open Studios Network and Artist Studios Report 2014	The report sets out the significance of affordable artists’ workspace to London’s culture, while identifying risks to future provision and makes recommendations to support a vibrant future for London’s artist population.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Culture	Arts Council England Strategy	Strategy promotes creating positive change throughout the arts, while helping create an environment where great arts and culture can thrive. It promotes investment in as well as support the development of world class museums and libraries to engage diverse audiences and describes how success will look and be measured against criteria and goals.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	The Mayor’s A-Z of Planning and Culture (October 2015)	A guide that demonstrates how the planning process can help support and sustain culture and makes planning terminology and processes more accessible.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	Mayor’s Culture Strategy, Cultural Metropolis (November 2010)	The Strategy considers how within this period of economic uncertainty and rapid change, it can maximise opportunities for the cultural life in London to flourish in preparation for the London 2012 Olympic and Paralympic Games.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	Mayor’s Cultural Strategy – achievements and next steps	The Strategy places emphasis on the success of London 2012 including the role of culture and creativity exhibited throughout the Olympic Games. The strategy outlines plans for the legacy of the Olympics and details the Mayor’s plan to revitalise the capital through culture.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	Mayor’s cultural tourism vision for London 2015 – 2017, Take a Closer Look	This vision identifies the importance of culture to the tourism industry, citing that four out of five visitors state that that ‘culture and heritage’ is their main reasons for coming to London. Offers ways in which London can maintain its position against international competition, by bringing the tourism and culture world’s closer together and spreading tourism benefits more evenly across the capital.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Culture	GLA Night Time Economy Commission, Strategic Case and Investment Proposal (2016)	A report outlining the findings of a six month investigation into what should be done to protect and manage the night time economy. The night time economy is a key part of the capital’s cultural offer, helping attract the millions of visitors that have helped the capital break records as the world’s most visited destination, with four out of five saying culture is a key reason for coming.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objectives 10, 13</b>
Culture	London’s Grassroots Music Venues Rescue Plan (October 2015)	Grassroots music venues are essential for success in the UK music industry while contributing to London’s desirability in all aspects, incorporates consultation with government, local authorities and the music industry. Explains issues that planning, licencing, policing and fiscal policy have balancing the needs of venues with the needs of residents and other businesses.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 13</b>
Air quality	EU Ambient Air Quality Directive (2008/50/EC)	A revision of previously existing European air quality legislation which sets out long term air quality objectives and legally binding limits for ambient concentrations of certain pollutants in the air. The directive replaced nearly all the previous EU air quality legislation and was made law in England through the Air Quality Standards Regulations 2010.	IIA to include objectives relevant to the achievement of the Directive standards.  <b>IIA Objectives 3, 14</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Air quality	EU Thematic Strategy on Air Pollution (2005)	Aims to cut the annual number of premature deaths from air pollution-related diseases by almost 40 per cent by 2020 (using 2000 as the base year), as well as substantially reducing the area of forests and other ecosystems suffering damage from airborne pollutants.	Ensure that the requirements of the strategy are reflected in the IIA framework. <b>IIA Objectives 3, 14</b>
Air quality	Air Quality Standards Regulations 2010	Establishes mandatory standards for air quality and set objectives for sulphur and nitrogen dioxide, suspended particulates and lead in air. Some pollutants have Air Quality Objectives (AQOs) expressed as annual mean concentrations due to the chronic way in which they affect human health or the natural environment (i.e. impacts occur after a prolonged period of exposure to elevated concentrations). Others have AQOs expressed as 24-hour or 1-hour mean concentrations due to the acute way in which they affect human health or the natural environment (i.e. after a relatively short period of exposure)	Give due consideration to how the plan can contribute to the objectives and targets of the Regulations. <b>IIA Objectives 3, 14</b>
Air quality	Environment Act 1995 (as amended)	Under "the 1995 Act" the Local Air Quality Management (LAQM) boroughs must regularly review and assess air quality within their boroughs and designate Air Quality Management Areas (AQMAs) where UK standards and objectives are currently not being met.  Currently all 33 London boroughs have designated AQMAs and the associated Air Quality Action Plans.	To be reflected in the London Plan <b>IIA Objectives 3, 14</b>
Air quality	Air Quality Strategy for England, Scotland, Wales and Northern Ireland	Ensure a level of ambient air quality in public places, which poses no significant risk to health or quality of life, for all to enjoy.	Ensure that the requirements of the Strategy are reflected in the IIA framework. <b>IIA Objectives 3, 14</b>
Air quality	National Planning Policy Framework (2012)	Paragraph 124 identifies that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.	IIA to include objectives relevant to the achievement of the NPPF objectives. <b>IIA Objectives 3, 14</b>
Air quality	UK's Air Quality Action Plan (Defra, revised January 2016)	Includes zone specific air quality plans which set targeted local, regional and national measures to ensure the UK air will be cleaner than ever before. There is an air quality plan for achieving EU air quality limit values for NO <sub>2</sub> in Greater London (September 2011). The plan identifies a variety of joint measures to improve NO <sub>2</sub> in the Greater London Urban Area agglomeration zone, including measures at different administrative levels (EU, national, regional and local). Some measures include, for example, promoting smarter travel, congestion charging, sustainable freight distribution, smoothing traffic flow, low-carbon vehicles, clean transport technologies and renewable energy sources	Reflect objectives in the IIA Framework. <b>IIA Objectives 3, 14</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Air quality	London Air Quality Network Summary Report 2014 (March 2016)	Details the results of air pollution measurements made on the London Air Quality Network during 2014 (and in 2016).  The London Air Quality Network (LAQN) is a unique resource, providing robust air pollution measurements that are essential to underpin air quality management and health studies.  Results on Carbon Monoxide, Nitrogen Dioxide, Nitrogen Oxides, Ozone, Sulphur Dioxide, PM <sub>10</sub> & PM <sub>2.5</sub>	To include an IIA objective which measures the extent to which the London Plan contributes to an improvement in air quality  <b>IIA Objectives 3, 14</b>
Air quality	Transport Emissions Roadmap (TERM), Cleaner transport for a cleaner London (TfL, September 2014)	Explains how new, innovative solutions may be required to meet the needs of London in a future where fewer vehicle kilometres are driven (to help achieve CO <sub>2</sub> targets and pollution limits). This has implications for policies related to car ownership, freight deliveries and road user charging.	Include IIA objectives that will test the whether London Plan policies give consideration to innovative solutions.  <b>IIA Objectives 3, 14</b>
Air quality	Transport Action Plan, Improving the health of Londoners (TfL, February 2014)	Recognises the importance of transport and street environments in improving people's health. It identifies air quality as one indicator of a healthy street environment and that poor air quality can impact upon cardiovascular disease and respiratory diseases depending on a number of factors such as a person's exposure to air quality and their vulnerability to disease.	To include IIA objectives in alignment with Transport Action Plan strategic direction.  <b>IIA Objectives 3, 14</b>
Air quality	Cleaning the Air, the Mayor's Air Quality Strategy (GLA, December 2010)	The strategy sets out a framework for improving London's air quality and includes a range of measures such as age limits for taxis, promoting low-emission vehicles, eco-driving and new standards for the Low Emission Zone aimed at reducing emissions from transport.	Include health IIA objectives which assess air quality of human health  <b>IIA Objectives 3, 14</b>
Air quality	Cleaner Air for London, the Progress Report on the delivery of the Mayor's Air Quality Strategy (GLA, July 2015)	Update report to the above strategy.	Include health IIA objectives which assess air quality of human health  <b>IIA Objectives 3, 14</b>
Air quality	WHO Air Quality Guidelines	The WHO Air quality guidelines provide an assessment of health effects of air pollution and thresholds for health-harmful pollution levels.  The Guidelines apply worldwide and are based on expert evaluation of current scientific evidence for: <ul style="list-style-type: none"> <li>particulate matter (PM)</li> <li>ozone (O<sub>3</sub>)</li> <li>nitrogen dioxide (NO<sub>2</sub>) and</li> <li>sulphur dioxide (SO<sub>2</sub>),</li> </ul>	Ensure that the objectives of the guidelines are reflected in the IIA framework.  <b>IIA Objectives 3, 14</b>
Air quality	Clean Air Act (1993)	An Act to consolidate the Clean Air Acts 1956 and 1968	Ensure that the objectives of the Act are reflected in the IIA framework.  <b>IIA Objectives 3, 14</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Air quality</b>	Mayor's Transport Strategy (2010)	Reducing air pollutant emissions from ground-based transport, contributing to EU air quality targets. It promotes incentives to use low emission vehicles, develops the current Low Emission Zone (LEZ) and takes a lead by promoting a cleaner public service fleet, including buses, taxis and Greater London Authority (GLA) Group vehicles.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objectives 3, 14</b>
<b>Climate Change</b>	United Nations Framework Convention on Climate Change	Aimed to mitigate the negative impacts of climate change and stabilise GHG concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system.	Include IIA objectives on Climate Change adaptation and mitigation.  <b>IIA Objectives 15, 16</b>
<b>Climate Change</b>	Kyoto Climate Change Protocol & UK Climate Change Programme	Requires the enhancement of energy efficiency in relevant sectors of the national economy. Limitation or reduction of methane emissions through recovery and use in waste management, as well as in the production, transport and distribution of energy.  Established to limit emissions of greenhouse gases. 6 gases addressed: Carbon dioxide, Methane, Nitrous oxide, Hydrofluorocarbons, Perfluorocarbons, Sulphur hexafluoride.	Sets targets relating to reductions of greenhouse gases. Kyoto Protocol sets a target to reduce greenhouse gas emissions by 5 per cent of 1990 levels, 2008-12. UK agreement is to reduce greenhouse gas emissions by 12.5 per cent below 1990 levels by 2008-12. UK Climate Change Programme national goal of a 20 per cent reduction in carbon dioxide emissions below 1990 levels by 2010.  <b>IIA Objectives 15, 16</b>
<b>Climate Change</b>	Climate Change Act 2008	Sets out a legally binding framework for national GHG emissions to be reduced by at least 80 per cent by 2050, compared to 1990 levels. The Act also paves the way for the UK to adapt to climate change.	Include IIA objectives on Climate Change adaptation and mitigation, measurable objectives with targets and indicators to reflect the Act.  <b>IIA Objective 15</b>
<b>Climate Change</b>	UK Low Carbon Transition Plan (2009)	Sets out how the UK will meet a 34 per cent cut in emissions on 1990 levels (or an 18 per cent cut on 2008 levels) by 2020 to deliver the UK's legally binding target to cut emissions by at least 80 per cent by 2050. It does this through setting five-year "carbon budgets" to keep the UK on track.	Include IIA objectives on Climate Change adaptation and mitigation. Set out measurable objectives.  <b>IIA Objectives 15, 16</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Climate Change</b>	London Climate Change Mitigation and Energy Strategy (2011)	Details the programmes and activities that are ongoing across London to further limit climate change and achieve the Mayor's target to reduce London's CO <sub>2</sub> emissions by 60 per cent of 1990 levels by 2025.	Include IIA objectives on Climate Change adaptation and mitigation.  <b>IIA Objectives 16, 17</b>
<b>Climate Change</b>	Mayor's climate change adaptation strategy, Managing risks and increasing resilience (2011)	The strategy aligns with the Mayor's other environment strategies and programmes which are built on three policy pillars: retrofitting London, greening London and cleaner air for London.	Include IIA objectives on Climate Change adaptation and mitigation.  <b>IIA Objective 15</b>
<b>Climate Change</b>	Transport Emissions Roadmap (TERM), Cleaner transport for a cleaner London (TfL, September 2014)	Explains how new, innovative solutions may be required to meet the needs of London where fewer vehicle kilometres are driven (to help achieve CO <sub>2</sub> targets and pollution limits). This has implications for policies related to car ownership, congestion and freight deliveries.	Include IIA objectives on Climate Change adaptation and mitigation. Set out measurable objectives.  <b>IIA Objectives 14, 15, 16</b>
<b>Climate Change</b>	EC White Paper: Adapting to Climate Change	Presents the framework for adaptation measures and policies to reduce the EU's vulnerability to the impacts of climate change. Outlines the need to create a mechanism by 2011 where information on climate change risks, impacts and best practices would be exchanged between governments, agencies and organisations working on adaptation policies. Since the impacts of climate change will vary by region, many adaptation measures will need to be carried out nationally or regionally. The role of the EU will be to support and complement these efforts through an integrated and co-ordinated approach, particularly in cross-border issues and policies which are highly integrated at EU level. Adapting to climate change will be integrated into all EU policies.	Give due consideration to how the plan can reflect climate change issues.  <b>IIA Objective 15</b>
<b>Climate Change</b>	Climate Change Risk Assessment	Outlines some of the most important risks and opportunities that climate change may present to the UK. It provides an overview but also focuses on five complementary themes: Agriculture & Forestry, Business, Health & Wellbeing, Buildings & Infrastructure and the Natural Environment. It provides an indication of the potential magnitude of impacts, when they might become significant and the level of confidence. The CCRA sets out the main priorities for adaptation in the UK. Forms one of the key components to the Government's response to the Climate Change Act 2008.	Ensure that the opportunities and risks are taken account of, and that these are addressed at an appropriate level, by the plan policies and IIA framework.  <b>IIA Objectives 15, 16</b>
<b>Climate Change</b>	National Adaptation Programme (NAP)	Sets out what government, businesses, and society are doing to become more climate ready. Developed in response to the UK Climate Change Risk Assessment. Forms one of the key components to the Government's response to the Climate Change Act 2008.	Ensure that the requirements of the Programme are reflected in the IIA framework.  <b>IIA Objective 15</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Climate Change	The Carbon Plan	The Climate Change Act established a legally binding target to reduce the UK's greenhouse gas emissions by at least 80 per cent below base year levels by 2050. The plan sets out how the UK will achieve decarbonisation within the energy policy framework: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households. Sets out proposals and policies for meeting the first four carbon budgets. Includes sectoral plans that set targets to contribute towards overall carbon budget and reiterates the commitment of working towards a zero waste economy. Targets of relevance are contained in the Low carbon industry sectoral plan (By 2027, emissions from industry should be between 20 per cent and 24 per cent lower than 2009 levels. By 2050, the Government expects industry to have delivered its fair share of emissions cuts, achieving reductions of up to 70 per cent from 2009 levels).	The plans policies and IIA framework should reflect the move towards a low carbon economy through measures such as diverting waste from landfill by driving it up the hierarchy and using alternate or low emission transport options where viable.  <b>IIA Objectives 15, 16, 23</b>
Climate Change	Promotion of the Use of Energy from Renewable Sources Directive (2009/28/EC)	Through this Directive the EU committed to providing 20 per cent of energy from renewable sources by 2020 and a mandatory 10 per cent minimum target should be achieved by all Member States for the share of biofuels in transport petrol and diesel consumption.  London aims to contribute to the national share of renewables generation, noting the additional challenges urban areas face.	Reflect objectives in IIA framework  <b>IIA Objectives 15, 16, 17</b>
Climate Change	Arup's Reducing Urban Heat Risk July 2014	Identifies the factors which contribute to urban heat risk, and has developed approaches and responses to address these factors	Reflect principles in IIA framework  <b>IIA Objective 15</b>
Climate Change	Joseph Rowntree Foundation's Vulnerability to Heatwaves and Drought- Adaptation to Climate Change Feb 2011	Sets out what it means to be vulnerable to climate change and how early examples of climate change adaptation may affect vulnerable groups in society.	Reflect principles in IIA framework  <b>IIA Objective 15</b>
Climate Change	The London Climate Change Partnership (LCCP) Overheating Thresholds Report June 2012	Summarises the findings of a small qualitative research project identifying some key hot weather related thresholds relevant to London and its urban systems. Focus is on some of the specific issues for the social housing and care home sectors.	Reflect findings in IIA framework  <b>IIA Objective 15</b>
Energy use and Supply	Scenarios to 2050: London Energy Plan	The London Energy Plan explores how much energy London would need in the future, where it might be needed and the different ways of supplying it. It is a set of interconnected data models for building demand, power, heat, decentralised energy and transport, which have been developed using the best available data and with input from a range of stakeholders.	Reflect targets in the relevant indicators in the IIA framework.  <b>IIA Objectives 11, 17</b>
Energy use and Supply	UK Renewable Energy Strategy 2015	Establishes the methods and reasons for increasing the use of renewable electricity, heat and transport. Models scenarios to show how targets might be met.	Ensure that the requirements of the Strategy are reflected in the IIA framework.  <b>IIA Objectives 11, 17</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Energy use and Supply	Energy White Paper: Meeting the Energy Challenge 2007	Sets out the government's international and domestic energy strategy to tackle climate change and secure clean and affordable energy. Recognises the need to save energy, develop cleaner energy supplies and secure reliable energy supplies at prices set in competitive markets. The key elements of the strategy are: <ul style="list-style-type: none"> <li>Establishing an international framework to tackle climate change.</li> <li>Providing legally binding carbon targets for the whole UK economy.</li> <li>More progress in achieving fully competitive and transparent international markets.</li> <li>Encouraging more energy saving through better information, incentives and regulation.</li> <li>Providing more support for low carbon technologies.</li> <li>Ensuring the right conditions for investment.</li> </ul>	Give due consideration to how the plan can contribute to meeting energy challenges. Ensure that the strategy is reflected in the IIA framework.  <b>IIA Objective 17</b>
Energy use and Supply	Mayor's Climate Change Mitigation and Energy Annual Report: 2013-2014 (June 2015)	The Mayor has set world-leading targets to reduce London's carbon dioxide (CO <sub>2</sub> ) emissions by 60 percent from 1990 levels by 2025. This report updates on London's progress towards meeting this target and Mayoral activity to reduce London's CO <sub>2</sub> emissions and secure its energy supply in 2013-14.	Reflect aims in the IIA framework.  <b>IIA Objectives 16, 17</b>
Energy use and Supply	London's Zero Carbon Energy Resource (2013)	Explores London's environment and waste heat sources that could supply energy to heat networks in the future. It suggests that London has sufficient environmental and waste heat to meet its building heat demand.	Reflects aims within the IIA framework  <b>IIA Objectives 17</b>
Energy use and Supply	London Infrastructure Plan 2050	This sets the context for increasing demand for energy and the services it provides due to population growth and associated development.	Reflects aims within the IIA framework  <b>IIA Objectives 11, 17</b>
Energy use and Supply	London Energy Plan forthcoming)- Scenarios to 2050: London Energy Plan	Aims to address issues in energy consumption, generation and distribution to support the development of new policies and programmes to achieve the Mayor's target	Reflect targets in the IIA framework.  <b>IIA Objective 17</b>
Water resources and quality	Water Framework Directive – 2000/60/EC	This Directive aims to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which: <ul style="list-style-type: none"> <li>Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems;</li> <li>Promotes sustainable water use based on a long-term protection of available water resources;</li> <li>Ensures the progressive reduction of pollution of groundwater and prevents its further pollution, and</li> <li>Contributes to mitigating the effects of floods and droughts</li> </ul>	Include objectives and indicators relating to water use and quality.  <b>IIA Objective 18</b>
Water resources and quality	Water Act 2003	National legislation which transposes the Water Framework Directive into UK law.	Include objectives and indicators relating to water use and quality.  <b>IIA Objective 18</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Water resources and quality	River Basin Management Plan (RBMP) for the Thames River Basin District (2009)	Implements the Water Act at a regional level, focusing on the protection, improvement and sustainable use of the water environment. Many organisations and individuals help to protect and improve the water environment for the benefit of people and wildlife. River basin management is the approach the Environment Agency is using to ensure combined efforts achieve the improvement needed in the Thames River Basin District.	Include objectives and indicators relating to water use and quality.  <b>IIA Objective 18</b>
Water resources and quality	Mayor's Water Strategy (2011)	The first water strategy for London and provides a complete picture of London's water needs. The strategy calls for organisations involved in the city's water management to: <ul style="list-style-type: none"> <li>invest in a water management and sewerage infrastructure system that's fit for a world class city and will create jobs;</li> <li>support and encourage Londoners to take practical actions to save water, save energy and save money off their utility bills; and realise the potential of London's sewerage as an energy resource to help reduce greenhouse gas emissions.</li> </ul>	Ensure that the requirements of the Strategy are reflected in the IIA framework.  <b>IIA Objective 18</b>
Water resources and quality	Thames River Basin Management Plan (2009)	Focuses on the protection, improvement and sustainable use of the water environment. Many organisations and individuals help to protect and improve the water environment for the benefit of people and wildlife. River basin management is the approach the Environment Agency is using to ensure combined efforts achieve the improvement needed in the Thames River Basin District.	Ensure that the requirements of the Strategy are reflected in the IIA framework.  <b>IIA Objective 18</b>
Water resources and quality	London Abstraction Licensing Strategy (2013)	Sets out how water resources are managed in the London area. It provides information on where water is available for further abstraction and an indication of how reliable a new abstraction license may be	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 18</b>
Flood risk	Water Framework Directive (WFD) 2000/60/EC (2000)	Expands the scope of water protection to all waters, surface waters and groundwater, and aimed to achieve 'good' status or potential for all waters by 2015, or under certain provisions, 2021 or 2025.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	Flood & Water Management Act 2010	Assigned new responsibilities to local authorities to work in partnership with the Environment Agency, water companies and others to manage various aspects of flood risk. It requires Lead Local Authorities to produce a local strategy setting out significant flood risks affecting their area, and how they intended to address them.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	UK Water Strategy (2008)	Builds on the principles of the existing Government Strategy for Flood and Coastal Erosion Risk Management - 'Making Space for Water' (2005) to ensure a fully integrated approach to flood risk and water management up to 2030.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	National Planning Policy Framework (March 2012)	Set out that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, including flooding.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	London's Regional Flood Risk Appraisal (2014)	A strategic level assessment of flood risks across London with a focus on main development locations and strategic infrastructure.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Flood risk	Thames Catchment Flood Management Plan (2009)	Provides an overview of the potential extent of flooding now and in the future, and enables policies to be set for managing flood risk within Thames Catchment. The plan, which contains a range of data and policies, is used to inform planning and decision making by key stakeholders.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	Securing London's water future, the Mayor's Water Strategy (2011)	Calls for organisations involved in the city's water management to work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	Thames Estuary 2100 Plan (TE2100 Plan) (November 2014)	Sets out the recommendations and actions needed to manage flood risk. It aims to direct future work on flood warning, flood plain management and expenditure needed to maintain and replace 330 km of walls, embankments, flood barrier and gates.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Flood risk	London Resilience Partnership Strategic Flood Response Framework (2015)	Considers flooding, of any kind, causing or with the potential to cause London-wide impacts. This includes flooding from rivers, the sea (tidal), surface water, groundwater, reservoirs, sewers, canals and artificial waterways. This may be severe flooding in one or more locations requiring a London-wide response, or a greater number of less severe flooding in multiple locations within London.	Ensure that water protection is reflected in the IIA objectives.  <b>IIA Objective 19</b>
Natural Environment and Natural Capital	Directive on the Conservation of Wild Birds 79/409/EEC	Provides a framework for the conservation and management of wild birds in Europe, including their habitats.	Ensure that the requirements of the Directive are reflected in the framework.  <b>IIA Objective 20</b>
Natural Environment and Natural Capital	EC Directive on the Conservation of Habitats and Wild Fauna and Flora 92/43/EEC	<ul style="list-style-type: none"> <li>Conserve fauna and flora and natural habitats of EU importance.</li> <li>Establish a network of protected areas throughout the community designed to maintain both the distribution and abundance of threatened species and habitats.</li> </ul>	Ensure that the requirements of the Directive are reflected in the framework.  <b>IIA Objective 20</b>
Natural Environment and Natural Capital	Conservation of Habitats and Species Regulations 2010	Provide for the designation and protection of a Natura 2000 sites, the protection of European protected species, and the adaptation of planning and other controls for the protection of European Sites in the UK	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan.  <b>IIA Objective 20</b>
Natural Environment and Natural Capital	Wildlife & Countryside Act 1981 (as amended)	The principal piece of UK legislation relating to the protection of wildlife. It consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain. The Countryside and Rights of Way Act 2000 was passed to provide additional levels of protection for wildlife whilst also strengthening the protection afforded to SSSI.	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan.  <b>IIA Objective 20</b>



Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Natural Environment and Natural Capita	Natural Environment and Rural Communities Act 2006	Designed to help achieve a rich and diverse natural environment and thriving rural communities. Section 40 of NERC Act carries a duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. Section 41 requires the Secretary of State to publish a list of the living organisms and types of habitat which it deems of principal importance for the purpose of conserving biodiversity.	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan. <b>IIA Objective 20</b>
Natural Environment and Natural Capita	England biodiversity strategy: Climate change adaptation principles	Sets out principles (and priorities) to guide adaptation to climate change and manage impacts of climate change on biodiversity, principles include: maintain and increase ecological resilience, accommodate change, take practical action now, develop knowledge and plan strategically, and integrate action across all sectors.	The plans policies and IIA framework should reflect the principles and seek to contribute towards the adaptation priorities. <b>IIA Objectives 15, 16, 20</b>
Natural Environment and Natural Capita	The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)	The guidance references a biodiversity indicator, which was developed as a result of a Defra commissioned research project in 2003/4. The indicator developed to measure local authority performance is: ‘Progress towards achieving a local authority’s potential for biodiversity’, which is based on four sub-indicators relating to: • The management of local authority landholdings (e.g. per cent of landholdings managed to a plan which seeks to maximise the sites’ biodiversity potential. • The condition of local authority managed SSSIs (e.g. per cent of SSSI in ‘favourable’ or ‘unfavourable recovering’ condition). The effect of development control decisions on designated sites (e.g. change in designated sites as a result of planning permissions).	IIA should include objectives relating to biodiversity. <b>IIA Objective 20</b>
Natural Environment and Natural Capita	UK post-2010 Biodiversity Framework	The purpose of this UK Biodiversity Framework is to set a broad enabling structure for action across the UK between now and 2020. It seeks a more joined up strategic approach in relation to planning for biodiversity (i.e. Biodiversity Action Plans). It identifies a set of strategic goals and key actions to achieve these. The framework takes account of international drivers such as the ‘Strategic Plan for Biodiversity 2011–2020’ (including the 20 Aichi targets), agreed at Nagoya, Japan in October 2010, and the EU Biodiversity Strategy (EUBS) May 2011.	The plans policies and IIA framework should give due consideration to resultant biodiversity strategies, policy and the London BAP (including its priorities and targets). <b>IIA Objective 20</b>
Natural Environment and Natural Capita	Biodiversity 2020	Sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. Identifies a vision, mission, outcomes and actions to show what achieving the overarching objective by 2020 will mean in practice. Vision for England - By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone.	The plans policies and IIA framework should support the 2020 mission and seek to enhance biodiversity and ecological networks. <b>IIA Objective 20</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Natural Environment and Natural Capita	The Natural Choice – securing the value of nature (2011)	Sets out the Government’s policy framework for ensuring that decisions by central government, local government and others properly value the economic and social benefits of a healthy natural environment. Introduces the concepts of green infrastructure, ecosystem services and natural capital.	Ensure relevant IIA objectives are consistent with Government policy framework <b>IIA Objective 20</b>
Natural Environment and Natural Capita	National Planning Policy Framework (2012)	Sets out how the planning system should contribute to and enhance the natural environment by: • protecting and enhancing valued landscapes, geology and soils; • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible	Ensure relevant IIA objectives are consistent with national planning policy <b>IIA Objective 20</b>
Natural Environment and Natural Capita	Mayor’s Biodiversity Strategy, Connecting with London’s Nature (GLA, July 2002)	Contains information about the ecology of London, the habitats present across the city and the wildlife these support. It also sets out the reasons for protecting and enhancing the natural environment including the benefits related to health and well-being, climate change adaptation and broader environmental objectives such as improved air and water quality. Set out the policies and proposals necessary for the conservation and promotion of biodiversity.	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan. <b>IIA Objective 20</b>
Natural Environment and Natural Capita	Mayor’s Biodiversity Strategy Update, A review of progress and priorities for action (GLA, 2015)	Sets out a summary of the current status of London’s habitats and wildlife, the progress which has been made on implementing the Mayor’s Biodiversity Strategy and priorities for action going forward.	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan. <b>IIA Objective 20</b>
Natural Environment and Natural Capita	London Underground Biodiversity Action Plan 2010, Connecting Nature (2010)	Identifies London Underground land holdings essential habitats for the wide range of plants and animals in London. Because of this, the railway lineside environment is increasingly recognised for its contribution to London’s greenspace and as a biodiversity asset for London.	Reflect importance in IIA Framework <b>IIA Objective 20</b>
Natural Environment and Natural Capita	Green Capital. Green Infrastructure for a future city (2016)	Sets out information and the importance of London’s Green infrastructure, including features such as street trees and green roofs. Benefits include • healthy living; • mitigating flooding; • improving air and water quality; • cooling the urban environment; • encouraging walking and cycling; and • enhancing biodiversity and ecological resilience.	Include Natural Environment topic in the IIA objectives to test sustainability of the London Plan. <b>IIA Objective 20</b>
Townscape and Landscape	National Planning Policy Framework (March 2012)	Sets out a number of policies on the protecting and enhancing valued landscapes through good design.	Ensure that priorities are reflected in the development of the IIA Framework <b>IIA Objective 7</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Townscape and Landscape</b>	European Landscape Convention (2000)	Established a definition of landscape and highlighted the importance of developing policies dedicated to the protection, management and creation of landscapes, and establishing procedures for stakeholders and the public to participate in policy creation and implementation. Promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	Plan policies to support overall objectives and requirements of the Convention. Ensure that the requirements of the Convention are reflected in the IIA framework.  <b>IIA Objectives 7, 20</b>
<b>Townscape and Landscape</b>	Countryside and Rights of Way Act 2000	Addresses the designation of Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs), Open Country and Common Land. It also adds provisions to the consideration and management of the Public Right of Way network.	Ensure that the requirements are reflected in the IIA framework.  <b>IIA Objective 20</b>
<b>Townscape and Landscape</b>	Streetscape Guidance (TfL, Third Edition, 2016 Revision 1)	Provides a standard for London's streets and spaces to be used by those who will be working on or affecting London's streets. Whether a one-off major project or a smaller local adjustment, it defines aspirations and outlines the criteria for good design, material selection, installation and maintenance.	Ensure that the principles and criteria for good design are embedded into the IIA framework.  <b>IIA Objectives 7, 21</b>
<b>Townscape and Landscape</b>	Publicly Accessible Space – London Assembly Report June 2011	A London Assembly report that highlights the trend the increase in privately owned space and therefore the importance on trying to increase the amount of public and privately owned spaces that can be accessed and used by the public.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objectives 7, 8</b>
<b>Historic Environment</b>	Planning (Listed Buildings and Conservation Areas) Act 1990	Builds on the framework set out in the European Conventions and includes the protection of Scheduled Monuments, Conservation Areas, Registered Parks and Gardens and Listed Buildings.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
<b>Historic Environment</b>	Ancient Monuments and Archaeological Areas Act 1979	Builds on the framework set out in the European Conventions and includes the protection of Scheduled Monuments, Conservation Areas, Registered Parks and Gardens and Listed Buildings.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
<b>Historic Environment</b>	National Planning Policy Framework (March 2012)	Paragraphs 126 states that the local authorities should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. It highlights the importance of conserving the significance of heritage assets and their settings.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objectives 7, 21</b>
<b>Historic Environment</b>	UNESCO guidelines on World Heritage Sites	Sets out guidelines for the conservation and management of World Heritage Sites.	Ensure that priorities are reflected in the development of the IIA Framework  <b>IIA Objective 7, 21</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Historic Environment</b>	Palace of Westminster and Westminster Abbey, including St Margaret's Church World Heritage Sites Management Plan 2007	Sets out the Westminster's World Heritage Sites Outstanding Universal Value and significance and key issues for the management of the site and its setting.	Ensure relevant objectives of the management plan are reflected in the IIA framework.  <b>IIA Objectives 7, 21</b>
<b>Historic Environment</b>	Tower of London World Heritage Site Draft Management Plan 2016	Sets out the Tower of London's World Heritage Sites Outstanding Universal Value and significance and key issues for the management of the site and its setting.	Ensure relevant objectives of the management plan are reflected in the IIA framework.  <b>IIA Objectives 7, 21</b>
<b>Historic Environment</b>	Maritime Greenwich World Heritage Site Management Plan 2014	Sets out the Greenwich Maritime World Heritage Sites Outstanding Universal Value and significance and key issues for the management of the site and its setting.	Ensure relevant objectives of the management plan are reflected in the IIA framework.  <b>IIA Objectives 7, 21</b>
<b>Historic Environment</b>	Royal Botanic Gardens, Kew World Heritage Site Management Plan 2011	Sets out the Kew Gardens World Heritage Sites Outstanding Universal Value and significance and key issues for the management of the site and its setting.	Ensure relevant objectives of the management plan are reflected in the IIA framework.  <b>IIA Objectives 7, 21</b>
<b>Historic Environment</b>	Historic Environment Good Practice Advice in Planning: 1 The Historic Environment in Local Plans March 2015	A good practice guide to implementing the NPPF in respect of the conserving the historic environment.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
<b>Historic Environment</b>	Historic Environment Good Practice Advice in Planning: 2 Managing Significance in Decision-Taking in the Historic Environment. March 2015	A good practice guide to help decision makers assess the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
<b>Historic Environment</b>	Historic Environment Good Practice Advice in Planning: 3 The Significance of Heritage Assets	A best practice guide on the importance of managing change within the settings of heritage assets, includes guidance on the extent of settings, views, and significance.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
<b>Historic Environment</b>	Conservation Area Designation, Appraisal and Management Historic England Advice Note 1	Provides information for local authorities and other interested parties on designating, appraising and managing conservation areas.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Historic Environment	Managing change to Heritage Assets Historic England Advice Note 2	Provides general advice on repair, restoration, addition, alteration, works for research, based on the types of heritage asset.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objective 21</b>
Historic Environment	Tall Buildings Historic England Advice Note 4	Updates previous guidance by English Heritage and CABE, produced in 2007. Provides information of the importance aspects to consider in respect of proposals for tall buildings and their impact on the historic environment.	Ensure principles are reflected in the development of the IIA Framework  <b>IIA Objectives 7, 21</b>
Historic Environment	Mayor's Culture Strategy, Cultural Metropolis (November 2010)	Makes a number of commitments which the Mayor, working with the London Cultural Strategy Group and range of partners, intends to deliver.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objectives 10, 13, 21</b>
Historic Environment	Mayor's cultural tourism vision for London 2015 – 2017, Take a Closer Look	Assesses and celebrates achievements since publication of the Strategy, offers an update and analysis, identifies some of the key issues and challenges still facing London's cultural sector	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objectives 10, 13, 21</b>
Historic Environment	Mayor's cultural tourism vision for London 2015 – 2017, Take a Closer Look	This vision identifies the importance of culture to the tourism industry, citing that four out of five visitors state that that 'culture and heritage' is their main reasons for coming to London. Offers ways in which London can maintain its position against international competition, by bringing the tourism and culture world's closer together and spreading tourism benefits more evenly across the capital.	Ensure that priorities are reflected in the IIA framework.  <b>IIA Objectives 10, 13, 21</b>
Historic Environment	World Cities Culture Report 2015 – measures and cultural assets	A detailed report centred on culture, providing global insights and statistics, which elaborate on how important culture is for a city. Including ways to make cities more vibrant, inclusive and liveable and how important it is for culture to be incorporated in urban policy, which tends to be vulnerable when budgets are cut.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objectives 10, 13, 21</b>
Geology and soils	EU Soil Strategy (2006)	Widely regarded as a precursor to the development of a Soil Framework Directive to protect and ensure the sustainable use of soil. Its aim was to prevent further soil degradation and restore degraded soil in line with its current and intended use.	Include protection of soil into the IIA framework  <b>IIA Objective 22</b>
Geology and soils	Seventh Environment Action Programme (2014)	Recognises that soil degradation is a serious challenge. It aspires that by 2020 land is managed sustainably, soil is adequately protected and the remediation of contaminated sites is well underway. It commits the EU and its Member States to increase efforts to reduce soil erosion and increase soil organic matter, and remediate contaminated sites.	Ensure that the objectives of the programme are reflected in the IIA framework.  <b>IIA Objective 22</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
Geology and soils	EU Environmental Liability Directive (99/31/EC)	Focuses on prevention and remediation of environmental damage, including land contamination, which presents a threat to human health. The Directive is based on the polluter pays principle, where polluters are responsible for remedying damage they cause to the environment.	Ensure that the requirements of the Directive are reflected in the IIA framework  <b>IIA Objective 22</b>
Geology and soils	Safeguarding our Soils – A Strategy for England (2009)	Sets out a vision to improve the sustainable management of soil and tackle degradation within 20 years. Aims to ensure that England's soils are better protected and managed. Four main themes: <ul style="list-style-type: none"> <li>• Sustainable use of agricultural soils</li> <li>• Role of soils in mitigating and adapting to climate change</li> <li>• Protecting soil functions during construction and development</li> <li>• Preventing pollution and dealing with historic contamination.</li> </ul> Details 16 key objectives for meeting these themes.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 22</b>
Materials and waste	EU Waste Framework Directive (2008/98/EC)	The aims of this Directive are: <ul style="list-style-type: none"> <li>• To provide a comprehensive and consolidated approach to the definition and management of waste.</li> <li>• To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society.</li> <li>• To ensure waste prevention is the first priority of waste management.</li> </ul>	The IIA framework to include objectives to minimise the production of waste and promotion of recycling.  <b>IIA Objective 23</b>
Materials and waste	Waste (England and Wales) (Amendment) Regulations 2014	Requirements of the EU Waste Framework Directive.	Ensure that IIA objectives reflect EU Waste Framework Directive  <b>IIA Objective 23</b>
Materials and waste	National Planning Policy for Waste (October 2014)	Sets out detailed waste planning policies and places responsibility on waste planning authorities to ensure that waste management is considered alongside other spatial planning concerns such as housing and transport; recognising the positive contribution waste management can make to developing sustainable communities. This includes preparing Local Plans which identify opportunities to meet the needs of their area for the management of waste streams	Reflect NPP for waste requirements in the IIA objectives  <b>IIA Objective 23</b>
Materials and waste	UK Waste Strategy for England (2007)	Describes a vision for better managing waste and resources and sets out changes needed to deliver more sustainable development in England.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 23</b>
Materials and waste	Mayor's Municipal Waste Strategy, London's Wasted Resource (November 2011)	Sets out policies and proposals for reducing the amount of municipal waste produced in London, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how, through the London Waste and Recycling Board, more waste management infrastructure will be developed in London.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 23</b>

Topic	Document Title	Key objectives, targets and indicators relevant to the London Plan and IIA	Implications for IIA
<b>Materials and waste</b>	Mayor's Business Waste Management Strategy (2011)	The first strategy for managing London's business waste. It sets out initiatives and case studies to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money, inspire new business ideas, and reduce harm to the environment.	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 23</b>
<b>Noise and vibration</b>	EC Noise Directive (2000/14/EC)	Addressing local noise issues by requiring authorities to draw up Action Plans to reduce noise where necessary and maintain environmental noise where it is good.	Ensure that the requirements of the Directive are reflected in the IIA framework.  <b>IIA Objective 24</b>
<b>Noise and vibration</b>	Noise Policy Statement For England (NPSE), March 2010	The NPSE sets out the long term vision of Government noise policy, promotes good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.  It sets out the following aims: <ul style="list-style-type: none"> <li>• Avoid significant adverse impacts on health and quality of life;</li> <li>• Mitigate and minimise adverse impacts on health and quality of life;</li> <li>• Where possible, contribute to the improvement of health and quality of life.</li> </ul>	Ensure principles are reflected in the IIA Framework  <b>IIA Objective 24</b>
<b>Noise and vibration</b>	National Planning Policy Framework (March 2012)	The NPPF contains a large number of national policies that are directly or indirectly related to the management of noise and the improvement of the acoustic environment. The Guidance makes clear that unacceptable adverse effects resulting from noise should be prevented. Paragraphs 109 and 123 contain important principles that directly relate to the management of noise.	Ensure principles are reflected in the IIA Framework  <b>IIA Objective 24</b>
<b>Noise and vibration</b>	Mayor's Ambient Noise Strategy (2004)	Sets out a long-term plan for dealing with noise from transport (including road traffic, rail traffic, aircraft and water transport) and fixed industrial sources, which are the main long-term, predictable, sources of 'ambient noise' (also called 'environmental noise'). Published in 2004 by the previous administration, Sounder City remains the Mayor's ambient noise strategy for London	Ensure that the objectives of the Strategy are reflected in the IIA framework.  <b>IIA Objective 24</b>