MAYOR OF LONDON

Sustainability Appraisal of the Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London)

Non-technical Summary

September 2006

Forum for the Future

ben cave associates

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In accordance with the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, a sustainability appraisal must be published with the draft alterations to the Strategy, together with a strategic environment assessment under the Environment Assessment of Plans and Programmes Regulations 2004.

Forum for the Future and Ben Cave Associates were commissioned by the Greater London Authority to undertake an independent sustainability appraisal as an iterative process during the development of the London Plan Further Alterations. This document is a non-technical summary of the Sustainability Appraisal/Strategic Environment Assessment, and therefore represents the views of Forum for the Future and Ben Cave Associates and not necessarily those of the Greater London Authority or the Mayor of London.

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In the face of the predicted development for London over the timeframe of the Plan, the GLA is presented with both a huge challenge and a real opportunity to transform Greater London into *an exemplary, sustainable world city*. History, and contemporary experience, shows us that development places enormous pressure on the environmental and social fabric of London. The London Plan sets a framework for London to develop in a way that not only maintains, but increases, quality of life for *all* Londoners.

The Sustainability Appraisal concludes that the alterations will help avoid many adverse impacts on biodiversity, health and wellbeing, equality and diversity, and will make an impact on carbon dioxide emissions, waste recycling and disposal.

The draft Further Alterations to the London Plan refines the London Plan. It ensures that the spatial development strategy sets the framework within which London's economic, social and environmental conditions continue to move in the right direction.

The Sustainability Appraisal concludes that the greatest improvements will be felt in transport and accessibility, the legacy of the 2012 Olympic and Paralympic Games, improved safety and security, the built environment, mitigating climate change, and the way in which the Plan is delivered across the sub-regions.

1. Introduction

This report is the non-technical summary from the Sustainability Appraisal of the draft Further Alterations to the London Plan. The full Sustainability Appraisal is available at: www.london.gov.uk.

The purpose of the Sustainability Appraisal is to assess the potential effects of the further alterations to the Plan, to identify recommendations for mitigation measures that would address any potentially adverse effects, and ultimately to improve the potential contribution of the London Plan to the sustainable development of London.

This summary highlights some of the significant sustainability challenges facing London, the issues and recommendations raised during the Sustainability Appraisal, and how these have been responded to by the GLA. It also includes a summary of the likely effects of the Plan and recommended mitigation and monitoring requirements.

The full report on the Sustainability Appraisal includes the appraisal framework, the relationship to relevant plans and policies, the evidence base, appraisal of alternatives and how the Sustainability Appraisal has influenced the Plan to date. The full appraisal findings include the likely impacts along with recommended mitigation measures, and recommendations for monitoring the effects of the Plan.

1.1 What is sustainable development?

The UK Sustainable Development Strategy *Securing our Future* sets out the guiding principles of sustainable development as: *"we want to achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science."* This places a clear change of emphasis on environmental limits. Put simply, sustainable development is about ensuring a better quality of life for everyone, now and for generations to come.

Good health is a key condition to enable both economic growth and sustainable development.[1] Longer, healthier, more productive human lives deliver concrete economic benefits. Good health in this sense is the very foundation of thriving modern societies and economies, and needs to be defined in much broader terms than simply the prevention of illness. The concept of good health embraces life-long physical and mental wellbeing that is essential for people to lead meaningful, enjoyable and productive lives.

1.2 Integrated appraisal

The European Directive 2001/42/EC on Strategic Environmental Assessment and guidance from the Department for Local Communities and Government, recommend the integration of the Strategic Environmental Assessment and the Sustainability Appraisal. This approach has been taken for the London Plan.

Human health is an integral part of sustainability and the Sustainability Appraisal provides a comprehensive appraisal of the London Plan including specific recognition of health issues. Forum for the Future has worked with Ben Cave Associates, who have provided health input to the SA. The SA team has not conducted an autonomous Health Impact Assessment (HIA) but has looked at health issues arising from the alterations to the London Plan as part of this wider SA process.

Documents from the health input to the Sustainability Appraisal are available on the London Health Commission's website.[2]

For the remainder of the report, the term *Sustainability Appraisal* also includes Strategic Environmental Assessment and Health Impact Assessment.

In addition, a screening exercise for an Appropriate Assessment under Article 6(3) and (4) of the Habitats Directive 92/43/EEC was undertaken. This was

[1] David Byrne, European Commissioner for Health and Consumer Protection

[2] See www.londonshealth.gov.uk

completed following the first three iterations of the SA and is presented as a separate report in appendix C.

The Sustainability Appraisal itself should provide an analysis of the London Plan along with an opportunity to comment on the process and the results.

1.3 The role of the London Plan

The London Plan is the development strategy for London, and sets out the strategic spatial framework for the future development of London up to 2025/26. The draft Further Alterations have been prepared in light of the Mayor's Statement of Intent on reviewing the London Plan. The review was tightly focused to address the key emerging issues facing London and other relevant matters, especially the need to adapt to and mitigate the effects of climate change.

The six objectives in the London Plan are to:

1. Accommodate London's growth within its boundaries without encroaching on open spaces
2. Make London a healthier and better city for people to live in
3. Make London a more prosperous city with strong, and diverse long-term economic growth
4. Promote social inclusion and tackle deprivation and discrimination
5. Improve London's accessibility
6. Make London an exemplary world city in mitigating and adapting to climate change and a more attractive, well-designed and green city.

The Government has recently proposed that the Mayor should be granted a strengthened role over planning, housing, adult skills, waste, culture and sport, health, energy and climate change. This will increase the Mayor's ability to deliver sustainable development, including through the London Plan.

The Greater London Authority (GLA) Act states that the GLA must take account of three cross-cutting themes:

- The health of Londoners
- Equality of opportunity
- Its contribution to sustainable development in the UK.

The Sustainability Appraisal adopted an integrated approach looking at the total effect of polices and how together they drive forward sustainable development. This approach is also reflected in the London Plan itself.

2. The Sustainability Appraisal process

There are five stages in the Sustainability Appraisal process. The first stage (Stage A), identifying the initial scope of the SA was undertaken by Entec UK. In consultation with stakeholders, Entec defined the objectives, developed a framework, reviewed relevant plans and policies, compiled the evidence base,

consulted on the scope and identified key significant issues to inform the full Sustainability Appraisal.

This report addresses Stages B and C of the Sustainability Appraisal – considering alternatives, assessing the effects and preparing the SA report. Stages D and E will be concluded later.

2.1 Appraisal framework

Twenty objectives were agreed during Stage A to assess the potential effects of the Plan and to identify ways in which it could be improved. The objectives were presented under the London Sustainable Development Commission Framework. Each objective is supported by a set of questions that prompt detailed consideration of the policies within the draft Further Alterations to the London Plan.

SA Objective
Managing Resources
1. Biodiversity. To conserve and enhance natural habitats and wildlife, and to bring nature closer to people.
2. Water Quality and Resources. To improve the quality of surface waters and groundwater, and to achieve the wise management and sustainable use of water resources.
3. Natural Resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured local products.
4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases and ensuring that London is prepared for its impacts.
5. Air Quality. To improve air quality.
6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.
7. Waste. To minimise the production of waste across all sectors and to increase re-use, recycling, remanufacturing and recovery rates.
Getting Results

SA Objective
8. Built and Historic Environment. To enhance and protect the existing built environment (including architectural distinctiveness, townscape/landscape and archaeological heritage), and to ensure new buildings are appropriately designed and constructed in a sustainable way.
9. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.
10. Accessibility / Availability (Transport). To maximise accessibility to key services and amenities and to increase the proportion of journeys made by public transport, by bicycle and on foot (relative to those taken by car).
11. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities, and to improve efficiency in land use through the sustainable re-use of previously developed land and existing buildings.
12. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.
13. Stable Economy. To encourage a strong, diverse and stable economy, and to improve the resilience of businesses and their environmental, social and economic performance.
14. Creativity and Innovation. To promote creativity and innovation in the environmental and social economy (including new clean technologies, renewable energy, pollution control and the skills sector).
Taking Responsibility
15. Liveability and Place. To create and sustain liveable, mixed-use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.
16. Education and Skills. To maximise the education and skills levels of the population.
17. Ownership and Participation. To promote civic participation, ownership and responsibility, and to enable individuals, groups and communities to contribute to decision-making at neighbourhood, borough and regional levels in London.
Developing Respect

SA Objective
18. Health and Well-being. To maximise the health and well-being of the population and to reduce inequalities in health.
19. Safety and Security. To enhance community safety by reducing crime, antisocial behaviour and the fear of crime.
20. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.

The London Sustainable Development Commission have developed three *virtuous cycles* as a way of integrating sustainability 'at source'. These *virtuous cycles* have influenced this SA to ensure integration of policy objectives rather than a single-issue approach. The Individual sustainability objectives are complemented by cross-cutting approach taken by these 'virtuous cycles',[3]. They are as follows:

- *Land use, energy use, resource flows, access, transport, and climate change policies that will achieve mutual and reinforcing goals of creating sustainable, compact, inclusive, mixed-use development.*
- *Employment, skills, mobility, and inequality policies that lead to creation of a sustainable, skilled and diverse workforce.*
- *Health, wellbeing, safety, environmental quality, participation, and diversity policies that deliver sustainable communities*

A steering group was established to oversee the Sustainability Appraisal comprising representatives from the GLA, the secretariat from the London Sustainable Development Commission and representation from the London Health Commission.

2.2 Consultation

In order to maximise the usefulness and influence of the ongoing Sustainability Appraisal, the SA team undertook four iterations all of which included significant engagement with stakeholders and the policy authors. A series of workshops was held with the SEA statutory consultees, health stakeholders, the LSDC and a number of other organisations.

The Sustainability Appraisal has been carried out parallel in to the preparation of the alterations to the Plan. This twin-track approach is central to SA. It has meant that the results of the Sustainability Appraisal and the consultation exercises have been fed back to the policy authors and considered at each stage.

[3] The Mayor recommends that SA is built around the LSDC Framework and the 4Rs.

2.3 Significant sustainability issues facing London

Many of the significant issues arising from the plan were highlighted in the Mayor's Statement of Intent and acted as a driver for the changes in the first place. The scoping report also identified the significant issues highlighted by stakeholders. The findings of stages B and C of the Sustainability Appraisal echo many of these issues and include:

- **Natural resources**: increasing demand for water, use of energy, pressure on biodiversity and open space arising from population growth and increased economic activity.
- **Housing**: the need for affordable and sustainable housing and different types of dwelling, spiralling housing costs and increased demand.
- **Climate change**: carbon dioxide emissions are on the increase and could be exacerbated by the proposed level of growth if not managed in an appropriate way. Climate change could have severe ramifications for London's population, economy, wildlife, cultural heritage, and material assets.
- **Equality and diversity**: meeting the needs of a growing population with a changing demography, greater diversity and worsening trends of social inequalities.
- **Regeneration and land use**: regeneration in the Thames Gateway and ensuring that the opportunities for generating a lasting and sustainable legacy from the 2012 Olympic and Paralympic Games are maximised, particularly for East London communities.
- **Accessibility/availability**: ongoing pressure to move around London and potential adverse impacts in the form of congestion, increased pressure on public transport systems and so on.
- **Air quality**: London still suffers from some of the worst air quality in the UK and is in breach of two EU targets.
- **Stable economy**: continued high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially.
- **Waste**: significant challenges to raise the level of recycling and self-sufficiency for waste disposal from the very low base in 2000. The challenge of maintaining a vibrant retail sector, whilst ensuring that the ethos of sustainable consumption is adhered to, including providing for new directives on waste disposal.
- **Safety and security**: high levels of crime and perception of crime, the continuing threat of terrorism and the need to make London safe for both visitors and residents.
- **Employment**: high levels of unemployment, particularly among Black, Asian, Ethnic and Minority groups, the removal of barriers to employment, and the key role played by London's economy within the whole UK economy.
- **Health and well-being**: poor health outcomes and a widening disparity of relative wellbeing across London boroughs (across a range of health

issues), high rates of child poverty and the relative impacts on the capacity of Londoners to engage economically and socially.

3. Influence of the SA

From the start of the process, the SA team found that the Plan contained an impressive suite of policies. The recommendations in the Sustainability Appraisal evolved as the alterations were drafted and sought to improve the Plan incrementally.

The aim was to increase consistency of implementation of policies and adequately address a number of key issues, rather than to propose radical revisions.

The early drafting of reports and direct engagement with the policy authors has enabled many of the recommendations made during the Sustainability Appraisal to be adopted into the Further Alterations to the London Plan. As a result, many changes have been made both to the policies and supporting text.

After consultation with the SA team the policy authors have adapted a number of policies. A few of the significant changes are listed below.

- Strengthening of the sub-regional policies in chapter five which were inconsistent with and inadequately reflected key policies in the rest of the Plan. The subsequent changes cover a range of issues including economic development, safety and security, biodiversity and climate change.
- Supporting the greater integration of climate change policies throughout the Plan and in particular, the chapters on housing and retail to reflect the Mayor's vision.
- Greater attention to the protection and enhancement of biodiversity in all areas of development, including European biodiversity sites.
- Acknowledgement of the problem of retrofitting sustainable design into buildings and giving greater emphasis to the potential benefits of retrofitting rather than demolition.
- Strengthening delivery of key targets such as renewable energy, across the boroughs.
- Strengthening the Mayor's commitments to mitigate and monitor the effects of a regional casino.

A full list of all adopted recommendations is available in the main report, and a further statement will be published, demonstrating how the Sustainability Appraisal has influenced the Plan once the London Plan has been adopted.

The Sustainability Appraisal also identified additional recommendations that would aid implementation of the Plan through key relevant strategies and supporting documentation, rather than in the Plan itself.

4. Recommendations for mitigation measures

The policy authors have not accepted all the recommendations from the Sustainability Appraisal and therefore potential mitigation measures are proposed to reduce or avoid any adverse effects. These additional measures include the following.

- Monitor the effectiveness of the plan in relation to delivering Mayoral objectives in delivering a sustainable London.
- Do more to direct the flow of benefits arising from economic development to disadvantaged communities and monitor the benefits and outcomes.
- Ensure that local communities do not suffer a disproportionate impact from the Olympics in the short-term, and benefit from the overall outcome of regeneration in the Lee Valley.
- Involve local communities in transport decisions.
- Minimise production of waste at source and encourage sustainable consumption and production to complement waste disposal policies.
- Avoid and if unavoidable, minimise, flood risk.
- Monitor and reduce adverse impacts from aviation, including noise and air pollution.

Again a full list of recommendations for potential mitigation measures is included in the main report.

5. The alternatives considered

A statutory part of the Sustainability Appraisal is the consideration of alternative ways of achieving a plan or programme. This encourages authorities to consider whether there are ways of achieving similar outcomes with reduced adverse economic, social and environmental effects. As the changes to the Plan are Further Alterations rather than a full replacement, two main options are considered:

1) Do nothing and continue applying the London Plan as it stands.

2) Make alterations, which strengthen policy in several areas in the pursuit of sustainable development.

The London Plan is not responsible for proactively encouraging growth, rather, it ‘s objective is to accommodate growth in London that is anticipated to happen in line with London’s role as a world city. Therefore, the options are based on this assumption rather than question the nature of the growth itself.

The Sustainability Appraisal concluded without doubt that - in the face of the anticipated increase in population and subsequent growth - doing nothing would result in adverse impacts on carbon dioxide emissions, biodiversity, health, equality and diversity, and waste recycling and disposal.

The draft Further Alterations to the London Plan provide the opportunity to refine the vision and framework for improving economic, social and environmental conditions across London. The greatest impact will be felt in affordable housing, transport and accessibility, the legacy of the 2012 Olympic and Paralympic Games, improved safety and security, the built environment, mitigating climate change and how the Plan is delivered across the sub-regions.

6. Likely sustainability effects of the Plan

In the face of the predicted development for London over the time frame of the Plan, the GLA is presented with both a huge challenge and a real opportunity to transform Greater London into *an exemplary, sustainable world city*. History and contemporary experience, show us that development places enormous pressure on the environmental and social fabric of London. The London Plan sets a framework for London to develop in a way that not only maintains, but significantly increases, quality of life for *all* Londoners.

This is exemplified through the aim of the Sustainability Appraisal, which is:

> ***To achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised.***

The radar diagram below presents the cumulative effect of the Plan against all 20 objectives used throughout the Sustainability Appraisal. The overall rating for these objectives is highlighted below, negative ratings appear towards the centre of the diagram and positive ratings towards the perimeter on a scale of 'significant negative, minor negative, mixed impact, minor positive to significant positive'. The full range runs from minus 18 to 18. Each rating has been derived from assessing the impact (positive, negative or mixed), magnitude (high, medium or low) and probability of occurrence (high, medium or low). These have been arrived at by a combination of looking at the evidence base, reviewing policies and professional judgement. The impact is rated according to the following scale:

+ + Significant positive impact (9 to 18)
+ Minor positive impact (3 to 8)
? Mixed impact or neutral (- 2 to 2)
- Minor negative impact or uncertain (- 3 to – 8)
- - Significant negative impact (-9 to –18)

The Sustainability Appraisal shows that the draft further alterations to the London Plan have real potential to contribute positively to this objective, and on the whole, the changes made to the Plan should increase sustainable development in London. This will be achieved through a series of policies that prioritise climate change, public transport and accessibility, affordable housing, renewable energy, waste facilities and health. These policies are

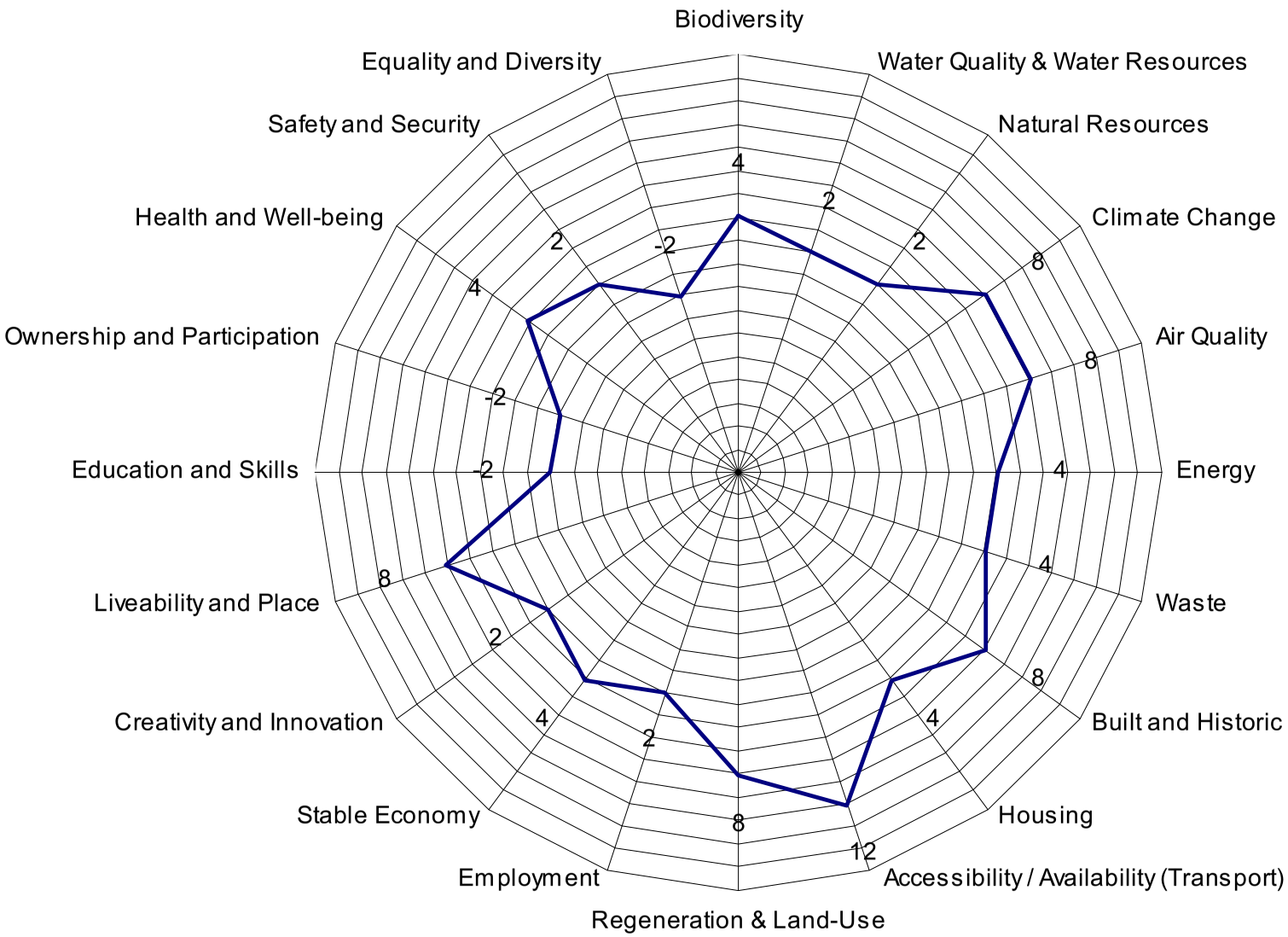
mutually reinforcing. For instance, by reducing congestion, you reduce air pollution, CO_2 emissions, improve health and reduce the burden to the economy.

Bold aspirations are evident in most policy areas, and sufficient clarity and guidance are provided against most areas (both within the Plan and through supporting documentation) to send a clear signal to developers and boroughs on how policies should be implemented.

Clearly accessibility is shown to have the most positive outcome, with ownership and participation and education and skills having a limited impact. All other changes should lead to some improvements against air quality, energy, waste, climate change, transport, built & historic environment, housing and regeneration and land use.

A successful economy is an important pre-requisite for enabling delivery of a range of social and environmental objectives, and it is in the way the economy is managed that will determine the extent of win-win-win outcomes. The Plan lays the foundation for reducing unemployment and stimulating economic activity by making provision for office space, promoting the central activity zone, opportunity areas, regeneration zones and sub-regional implementation. Questions remain over the resulting pressure on natural resources and whether benefit will accrue to those most in need. This will be determined on the ground during the actual implementation and monitoring.

Most of the ratings are relative to the actual scale of impact the Plan can have overall on a particular issue. This varies considerably according to the objective. For example, the Plan can significantly affect accessibility but has limited influence on safety and security. The alterations will help design out crime and the perception of crime, reduce the threat of terrorism in public transport, but significant changes will only result from a concerted effort across London. The policies on protecting open space are already working, but are unlikely to significantly enhance biodiversity and more likely to maintain the status quo in light of increased pressure from development. However, the whole range of policies that cumulatively make up liveability and place should help to make a reasonable improvement as is also the case with health and well-being. The combined effect of the impacts is predicted to be on the whole positive.


Biodiversity
Water Quality & Water Resources
Natural Resources
Climate Change
Air Quality
Energy
Waste
Built and Historic
Housing
Accessibility / Availability (Transport)
Regeneration & Land-Use
Employment
Stable Economy
Creativity and Innovation
Liveability and Place
Education and Skills
Ownership and Participation
Health and Well-being
Safety and Security
Equality and Diversity
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7. Key Issues

All issues, whether they are predominately mixed or positive, generally have a number of different impacts. The positive and mixed headings below denote the overall outcomes of the issues.

Positive

7.1 Accessibility

The importance of public transport provision is raised repeatedly in the Mayor's Statement of Intent on reviewing the London Plan, and is a core issue to the future development of London. The integration between the spatial and transport plans offers the opportunity to plan effectively for access at the outset, particularly in view of increased housing capacity and expansion of the economy, and is reflected in the alterations. The Plan endeavours to deliver a sustainable transport infrastructure that hits on CO_2 reduction targets, improves air pollution, reduces the need to travel, and increases social inclusion.

7.2 Climate change

In line with the potential scale of impact, climate change mitigation is prioritised throughout the Statement of Intent and in the Further Alterations. Clear criteria are set across a range of policy areas that will have a cumulative impact on climate change, notably protection of open spaces, transport, construction, waste, renewable energy generation and alternative industries. It is still uncertain how targets will be implemented and monitored, and performance could suffer under pressure from housing development, growth in aviation and commercial development. Targets set for renewable energy - particularly in the sub-regions - should act as a real driver to encourage alternative energy sources to replace fossil fuels. Whilst energy supply is clearly crucial to the delivery of the Mayor's aspirations on climate change, energy saving is at the top of the hierarchy.

The draft Alterations to the Plan have attempted to address the negative impact of aviation, particularly with regard to climate change. However, a fundamental conflict remains. Gains made in reducing emissions through public transport are likely to be matched by increases in emissions associated with aviation.

Recent years have seen the kind of weather patterns we might expect from climate change, and these have had clear impacts on the lives of Londoners. The health issues associated with climate change will become increasingly apparent. We will have to adapt to climate change across many areas of our lives. Some of the most important issues for the London Plan include: infrastructure resilience; the siting and type of future development; water security; flood risk; air pollution; and the potential impacts on biodiversity and wildlife.

7.3 The 2012 Olympic and Paralympic Games

The draft Further Alterations to the Plan have set the direction for the longer-term social and economic legacy of the Games. It is hoped that the Games will provide a real catalyst to providing incentives for developers to achieve high standards of construction, and through the assurance framework and other activities, to promote sustainable behaviours.

7.4 Waste

The move to become 85 per cent self-sufficient in waste disposal should be realised through the apportionment targets and ambitious recycling targets. The Plan still lacks sufficient detail on how to minimise waste at source, particularly in view of increased economic activity. We agree with the conclusions of the consultants who conducted the waste apportionment modelling, and think there is a real need for further iterations of the model using improved land availability data.

One of the most significant impacts on a range of natural resources - water, energy and waste - will arise from the significant increase of new build planned within greater London and this will be highly dependent on the methods and materials used. We have recommended that waste policies are consistently applied through planning including issues such as ensuring developers include infrastructure for waste minimisation in new developments.

7.5 Housing

The 50 per cent target set for affordable housing has been maintained in the alterations and should help to address affordability issues. Equally, the standards set for new build will raise the environmental performance of buildings. The pressure for development is likely to lead to increased vulnerability from flooding, despite policies to consider risk assessment and include appropriate adaptation measures. The plan has made some attempt to address retrofitting, but given the plan is focused on development, policies are almost exclusively focused on new build.

Mixed

7.6 Health

Many of the policies will have indirect and direct effects on human health. The population health outcome of the Plan depends upon the way in which the majority of non-health policies are implemented. The new objective on reducing health inequalities is a beneficial and highly positive addition, although questions remain about how this will be prioritised, achieved and measured throughout the Plan. Policies on health impact assessment (3A.20) and on the diverse needs of London's population (Policy 3A.14) are strongly supported.

Economic growth and economic development has beneficial and significant effects on people's health. London will derive the greatest benefits providing that this growth is located firmly in the context of wider community growth and community benefit, and not confined to the higher socio-economic groups. London continues to have pockets of extreme deprivation, to face high levels

of child poverty and high unemployment amongst BAME groups so it is vital that the benefits of economic growth are spread.

The policies on accessibility and transport are vitally important for health and wellbeing. The policies on play areas and on childcare are welcomed, as are the policies on trees and woodland. Access to green space is important for levels of physical activity and also for mental health. The SA raises concerns about the social and public health effects of Policy 3D.4i on the development of casinos and this has now been recognised in proposed mitigation measures within the Plan. We recognise that this policy is in line with government policy, and suggest further steps for mitigating potential adverse effects.

7.7 Biodiversity

The changes should undoubtedly help to enhance biodiversity and protect open space and this will be essential in the face of the development that is expected to occur over the lifetime of the Plan. Initiatives including the green grid and green arc should help to drive improvements. Policies are likely to bring people closer to nature through improved accessibility.

7.8 Economic development

The nature of economic growth will significantly influence the spread of poverty, mobility requirements, levels of resource efficiency and CO_2 emissions in London. The drive to deliver economic growth is not always compatible with protecting the environment, encouraging prudent use of natural resources, and reducing social exclusion. It is still unclear just how the proposed growth in London will impact on child poverty and high unemployment, particularly in Black Asian, Minority and Ethnic populations.

7.9 Ownership and participation

Generally, there are mixed references to ownership and participation within the existing Plan. Whilst some chapters have strongly and explicitly addressed involving community groups in decisions others make, there is little mention of community engagement. This may mean certain policies are more readily accepted and applied within communities, whilst others encounter opposition. A more consistent approach to ownership and participation needs to be taken.

7.10 Water Quality and Water Resources

Chapter 4A on climate change and London's metabolism, is excellent in its coverage of water issues and contains relevant policies on Sustainable Drainage systems (SUDs) and efficient use of water. The value of water as a resource is positively supported in the blue ribbon network, and in its role in supporting biodiversity, recreation and economic opportunities.

Policy 4B.4i London's building retrofitting aims to increase the efficiency of existing buildings and policy 4A.2i on sustainable design and construction also specifies making the most effective and sustainable use of water. This should go some way to addressing the substantial water supply deficit forecast which is likely to be exacerbated by further growth. The demand for

water needs to be tackled at every stage of development and prioritised, along with putting water supply and wastewater infrastructure in place ahead of planned growth. The emergent water action framework will support this aim, but a framework integrated into planning and development is urgently required.

7.11 Education and skills

More could be done to create the right infrastructure and physical environment for improved learning by applying high construction standards and improving accessibility to education facilities. Given the review of the Mayor's powers, more influence can be applied to this sector through his London Skills and Employment Board.

7.12 Equality and diversity

Considerable challenges remain given the current trends in unemployment, and participation rates amongst disadvantaged and BAME communities. The issues of high child poverty and the widening gap between rich and poor are clearly acknowledged in the Plan, but not always sufficiently reflected in the policies themselves. Overall trends will be affected by a range of other policies on the economy, environment, housing and transport. The use of the indicators as set out by the Child Poverty Commission would support monitoring here and inform future alterations to the Plan.

Further work on a separate Equalities Impact Assessment will be undertaken by the GLA.

8. Monitoring

The *London Plan Annual Monitoring Report* contains a concise list of 25 key performance indicators (KPIs) that monitor the effects of the Plan. This is supported by monitoring which occurs in a range of other sources and individual strategies complement this with further sets of indicators at the next tier down. There is no central framework that assesses all of these indicators and provides a picture of the wider impacts of the London Plan. This could pick up on some of the more sensitive issues for example, employment rates in London's most disadvantaged areas.

Many of the indicators are monitored and presented in other documents, but could be brought together under the London Sustainable Development Framework for London. Some of the indicators will be the outcome of many factors and information may only be available London wide, but as long as they are sensitive enough to reflect changes in London policy they will serve as a useful reflection on the impact of the policies within the LP.

Relevant indicators are highlighted within the main report. These could be integrated into the monitoring of the annual report, where relevant, along with other key relevant strategies. Some additional topics for monitoring are:

- The effectiveness of transport policies in improving accessibility and sustainable transport modes and where improvements have been directed e.g. by air pollution levels and traffic volumes mapped by locality.
- The contribution of alternatives to aviation e.g. high-speed rail links.
- The different attainment levels and employment participation of the different Black, Asian and Minority Ethnic (BAME) groups.
- Much stronger monitoring of greenhouse gas emissions to uncover whether that the intention to integrate measures to address climate change and other environmental impacts is followed through.
- Measuring income inequality between and within different groups in the sub-regions.
- Developing an overall measurement of the footprint of London. The GLA is currently undertaking work looking for an appropriate way of measuring this footprint.

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Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

Urdu

اگر آپ اِس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

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