

EARLY MINOR ALTERATIONS TO THE LONDON PLAN

***Integrated Impact Assessment Scoping report
Addendum***

The London Plan

(Spatial Development Strategy for Greater London)

January 2012

EARLY MINOR ALTERATIONS TO THE LONDON PLAN

IIA Scoping report - Addendum

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Early minor alterations to the London Plan

Integrated Impact Assessment Scoping report addendum

1. Introduction

1.1 Background

- 1.1 A draft Integrated Impact Assessment (IIA) scoping report was produced to inform stakeholders on the proposed approach to the IIA for the early minor alterations to the London Plan. The initial scoping report was developed with a range of input across the Greater London Authority (GLA), including the GLA Diversity and Social Policy Team and advice from independent consultants appointed by the GLA to prepare the full IIA. The consultants reviewed a draft of the scoping report as well as the Assembly/statutory consultee consultation version and provided feedback to ensure it met the requirements set out in legislation and guidance on each of the IIA elements.
- 1.2 The initial IIA scoping report was made available alongside the draft early minor alterations during their consultation to the London Assembly and functional bodies between 7th November and 20th December 2011. During this period the statutory consultees (Natural England, English Heritage and Environment Agency) were also consulted on the scope of the IIA. Two specific responses were received on the IIA scoping report and 15 on the early minor alterations to the London Plan. A summary of responses can be found on the GLA web-site.
- 1.3 A workshop was held on 18th November 2011 with stakeholders to obtain their opinion on the scope set out for the IIA. The minutes from the workshop are attached as Appendix 3. At the workshop several suggestions were made on how to update the scoping report and what should be considered in the full IIA. Suggestions relating to the IIA scoping report have been included in this addendum.
- 1.4 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) guidance sets out that the information in the scoping report should be kept up-to-date and relevant. Updates to the scoping report should capture any change in the policy context, the evidence base or the issues. This report is an addendum to the initial IIA scoping report prepared in November 2011 and incorporates relevant updates including:
 - updated proposed policies
 - updated baseline information
 - updated policy options and alternatives

2. Policy alterations

2.1 The proposed additional policy alteration

- 2.1.1 One additional policy alteration is proposed following the preparation of the initial IIA scoping report for the early alterations to the London Plan Assembly/statutory consultee consultation. The proposed alteration is additional wording to policy 5.22 - *Hazardous substances and installations* to make provision for the preparation of supplementary guidance on this matter.

2.2 Hazardous installations

- 2.2.1 In line with Policy 5.22 of the London Plan, Boroughs should, when assessing developments near hazardous installations, take account of site specific circumstances and proposed mitigation measures. The risks should be balanced with the benefits of development. The Health and Safety Executive (HSE) have identified consultation areas for developments located within specified distances of particular hazardous installations.
- 2.2.2 The HSE are a Government Agency responsible for regulating the safety of hazardous installations and assessing the potential hazards and risks of such developments. The HSE provides advice to planning authorities (PA's) on the suitability of proposed developments that are seeking planning permission within close proximity to hazardous installations.
- 2.2.3 In its role as a statutory consultee, the HSE adopted a revised land use planning process in 2006, which resulted in an increase in the size of the area around a hazardous installation that the HSE is being consulted on. These changes were introduced as a result of alterations to legislation governing hazardous installations, set out in the Seveso II Directive and the subsequent amended Planning (Control of Major Accident Hazards) Regulations 1999 (also referred to as COMAH), and the Planning Circular 04/2000 'Planning Controls for Hazardous Substances'.
- 2.2.4 The HSE does not have the power to direct refusal planning applications, however it will advise against what it considers to be insensitive development proposals. The consultation zones do not mean 'no' development. Although the risk or harm to an individual is greater the closer to the hazardous installation. Under specific circumstances a development proposal may be constrained by the advice of the HSE. Housing development is particularly sensitive. Depending on the number of persons connected with the development, their sensitivity (vulnerable populations such as children, old people) and the intensity of the development, the Executive may or may not advise against the proposal.
- 2.2.5 Although the HSE maintains a flexible approach to proposed development opportunities, some are high profile developments and regeneration opportunities and the existence of hazards could bear on the aspirations for the

area. Research¹ for the Mayor suggests that this issue could affect up to 10,000 units of housing.

2.2.6 There has been an element of uncertainty expressed by the boroughs and developers about the process regarding hazardous installations and the relative roles of the various organisations involved. Therefore the opportunity is being taken as part of the early minor alterations to the London Plan to make provision to publish guidance on development potentially affected by hazardous installations. This proposed alteration is to ensure appropriate weight can be given to any supplementary guidance in line with Circular 1/2008 which states planning guidance published by the Mayor should be based on published policy that has undergone Examination.

3. Plans, programmes and strategies

3.1 Additional plans, programmes and strategies

3.1.1 Below are the additional plans, programmes and strategies identified during the Assembly/statutory consultee consultation of the initial IIA scoping report for the proposed early minor alterations to the London Plan.

Table 1 Additional relevant plans, programmes and strategies

Plan, Programme or Strategy
<p>London's Places</p> <p>The impact of the Health and Safety Executive PADHI policy proposals on London Development Agency (LDA) and Greater London Authority policies and projects. Capita Symonds, 2007</p> <p>Summary</p> <p>This report details the implications that the HSE planning advice changes could have on delivering housing targets and the provision of strategic employment land. It outlines the HSE procedures and maps the hazardous installations and hazardous pipelines across London.</p>
<p>London's Economy</p> <p>The British cycling economy report. Gross Cycling Product Report. London School of Economics and Sky, 2011</p>

¹ The impact of the Health and Safety Executive PADHI policy proposals on London Development Agency (LDA) and Greater London Authority policies and projects. Capita Symonds, 2007

Summary

This report sets out the value of cycling to the UK economy, including aspects relating to manufacturing, cycle and accessory retail and employment as well as the benefits relating to health.

London's Transport

Analysis of cycling potential. Travel in London. Transport for London. 2010

Delivering the cycling benefits of cycling in outer London. London Councils and Mayor of London. 2010

National Travel Survey. Department for Transport. 2010

Summary

These reports outline a methodology and set out the potential for increases in cycling across London, including where and by whom potential additional cycle trips can occur. The reports include data on all transport modes, but especially cycling across the UK and London.

4. Additional and updated baseline information**4.1 Baseline information**

4.1.1 This section outlines the additional and updated baseline information identified during the IIA scoping workshop and the consultation period

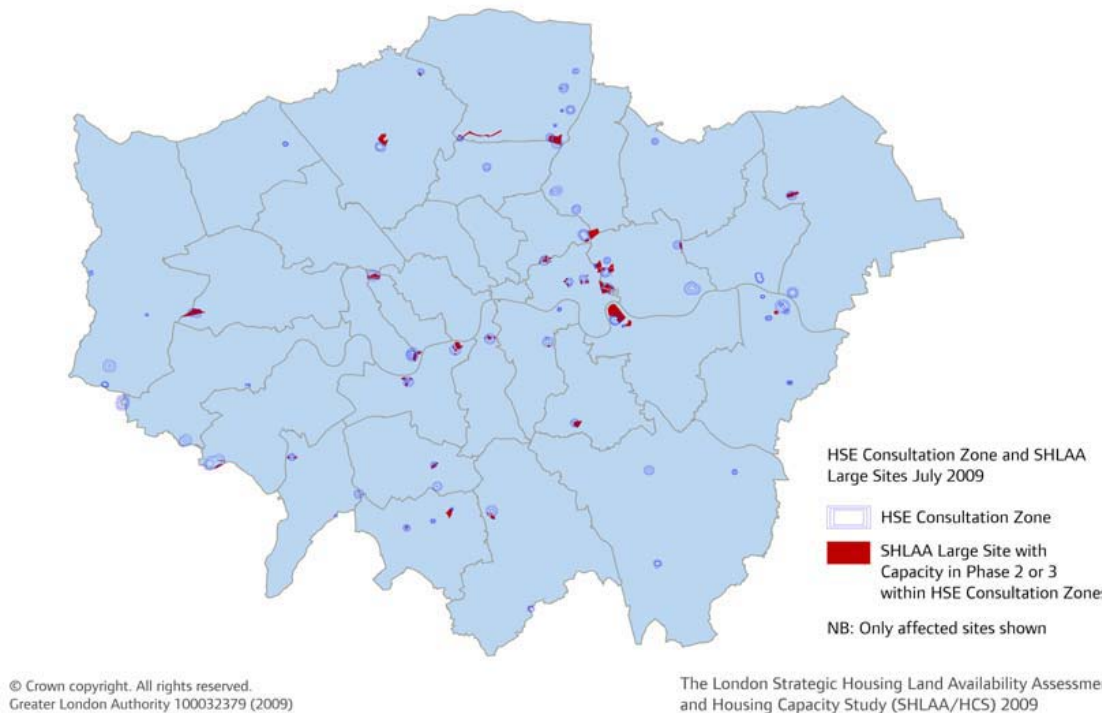
4.2 London's places

Hazardous installations

4.2.1 The Capita Symonds report², identified 71 hazardous installations and 119 hazardous pipelines across London in 2007. In addition, there are four major hazardous sites within the Greater London area. Of the 71 hazardous installations, 42 are gasholders. The SHLAA/HCS has identified 116 future housing sites that lie within or partially within a consultation zone. These sites have a total probable constrained capacity of 9,767 or 977 units per annum. 1,414 units have been identified within an 'inner zone', 4,221 units within the 'middle zone' and 4,132 probable units within the 'outer zone'. The map below (Map 1) shows the gasholder and hazardous installation sites in London, their consultation zone and the sites identified in the London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA&HCS) 2009 system.

² ibid

Map 1 Location of HSE gasholder installations

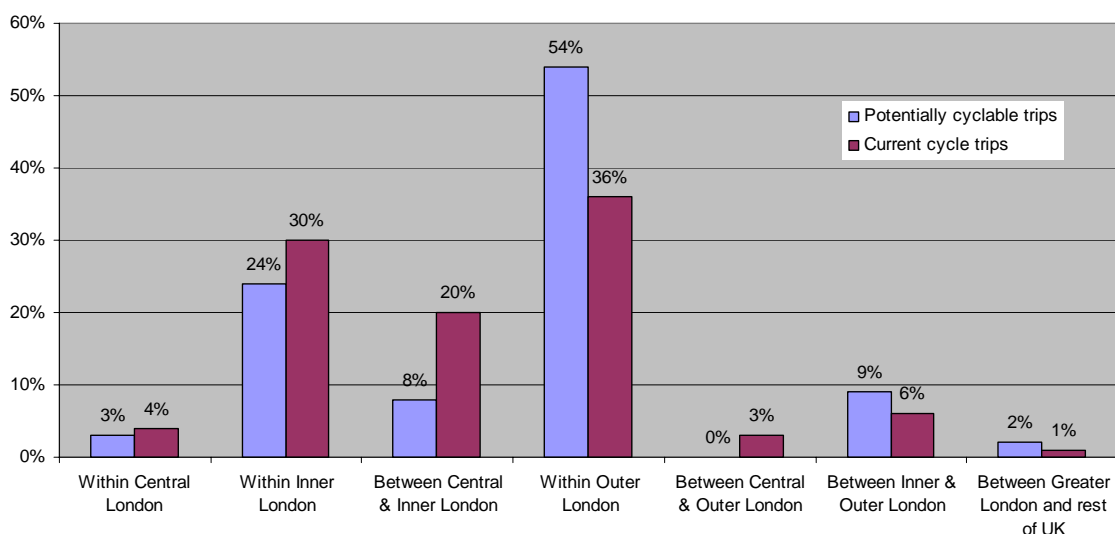


Cycling - Spatial element

4.2.2 The Mayor's *Analysis of cycling*³ potential outlines that a quarter of the potential growth in cycling is within inner London, 54 per cent within outer London and nine per cent travelling between the two regions. The inner London growth potential is concentrated in the West End (130,000) and Knightsbridge (50,000) in central London and in Kilburn (31,000), Hammersmith (27,000) and Lewisham (23,000) in inner London. Seven per cent of potential growth in cycle trips could originate in the 11 outer London Metropolitan town centres.

³ Analysis of cycling potential. Travel in London. Transport for London. 2010

Figure 1 Origin and destination of current and potential cycle trips, London residents⁴



4.2.3 There is a high density of potential growth in cycling within central and parts of inner London and around the outer London metropolitan town centres, especially in each of Croydon, Ealing, Bromley and Ilford town centres⁵.

4.2.4 Between 2005/06 and 2007/08, London residents made an average of 307,000 cycle trips per day⁶. Of these, the majority (192,800, 63 per cent) had an origin and/or destination in central or inner London and a quarter involved travel to or from central London from elsewhere in London. Figure 1 compares the origin and destination of current and identified potential growth in cycle trips.

4.2.5 Thirty eight per cent of cycle trips are made for work compared to only 23 per cent of all trips by all modes⁷. Whilst there is still potential for growth in work related cycle trips there is greater potential for growth in cycle trips for education and other purposes.

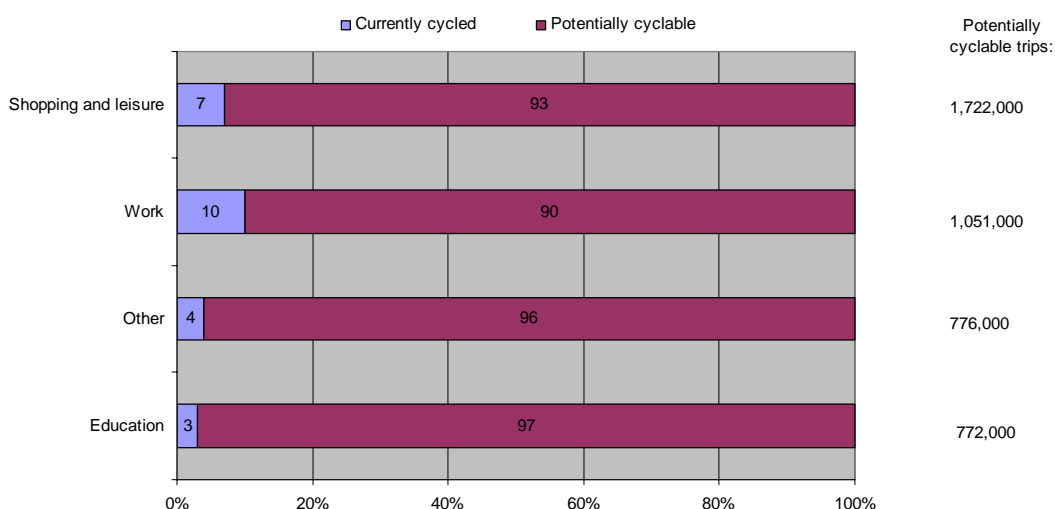
⁴ ibid

⁵ ibid

⁶ ibid

⁷ ibid

Figure 2 Current and potential cycle trips by journey purpose⁸



4.3 London's people

Demographics of people with disabilities

- 4.3.1 Analysis of the Annual Population Survey (APS) sample by Inclusion London⁹ revealed that 17.6% of the population in London is disabled. Based on a mid-2009 London population estimate of 7.75 million, this means that there are approximately 1.4 million disabled people living in London. Women are slightly more likely (55.1%) to be disabled than men (44.9%).
- 4.3.2 The analysis also identified that disabled people in London are younger than disabled people across the UK – 45.3% of disabled people in London are under 55 years of age compared with 40.7% of disabled people across the UK. Inclusion London suggest this could be because older disabled people tend to move away from London once they reach pensionable age because they can no longer afford to live in London when they are not working.
- 4.3.3 Among the different ethnic groups, Asian/Asian British groups (19.2%), Black/Black British groups (17.8%) and those that classify themselves as 'other' (19%) are most likely to be disabled¹⁰. Approximately 10% of young people between the ages 20–24 from a Pakistani background are disabled¹¹. This is just under double the proportion of all young people in London between the ages of 20–24 (5.2%) that are disabled.

⁸ ibid

⁹ The impact of spending cuts on deaf and disabled people in London. Inclusion London, 2011

¹⁰ ibid

¹¹ ibid

Income of people with disabilities

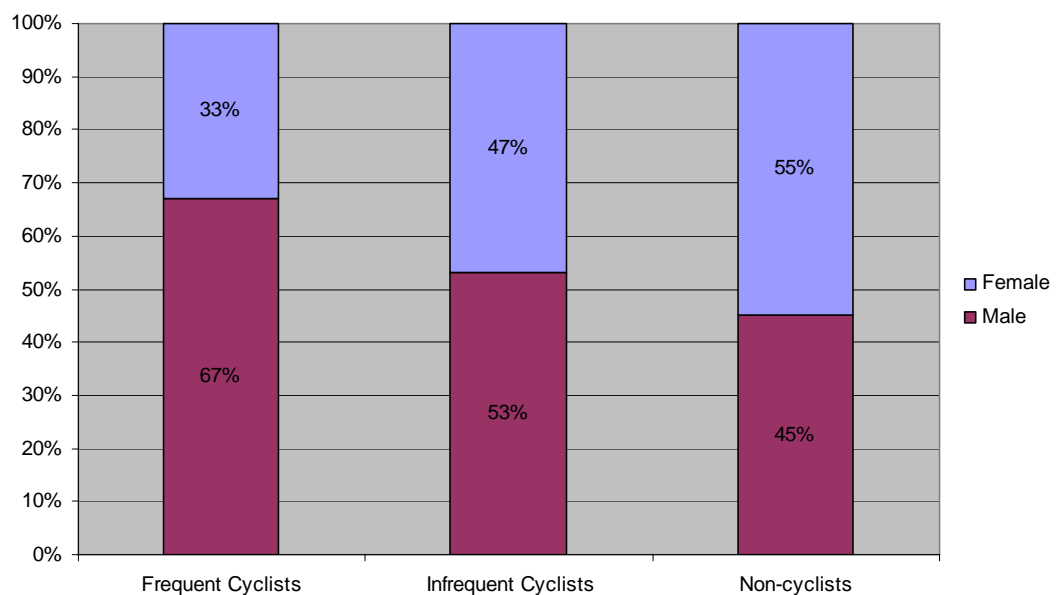
- 4.3.3 There is a marked difference in the weekly pay and income of disabled people compared with non-disabled people. Average net weekly pay for disabled people is £50 less than for non-disabled people: £344.90 compared to £389.40¹². One in three disabled adults earns less than £300 a week compared to less than one in five non-disabled adults¹³.

Demographics of cyclists

Gender

- 4.3.4 Men make up over 70 per cent of all bicycle trips in the UK¹⁴. However, cycling only accounted for three per cent of all trips undertaken by males aged 40-49 and only one per cent of trips for males aged over 60. Two thirds of frequent cyclists (those who cycle once a week or more often) and more than half of infrequent cyclists in London are men¹⁵. The proportion of men who cycle frequently is twice that of women (16 per cent compared to 8 per cent).

Figure 3 Cyclists by sex¹⁶



¹² ibid

¹³ ibid

¹⁴ The British cycling economy report. Gross Cycling Product Report. London School of Economics & Sky, 2011

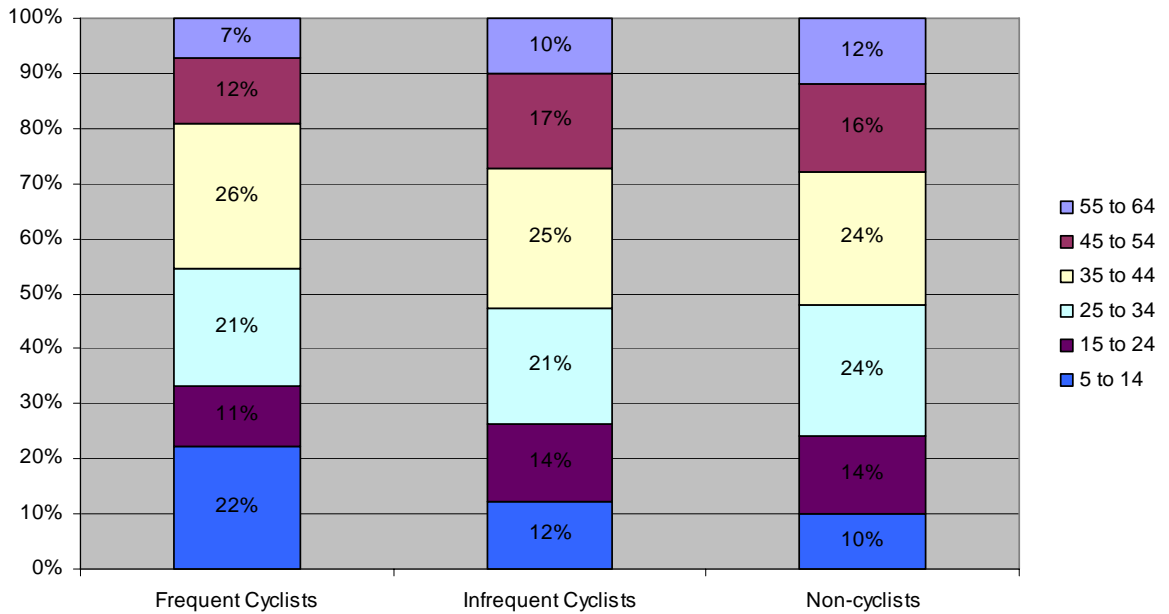
¹⁵ Analysis of cycling potential. Travel in London. Transport for London. 2010

¹⁶ ibid

Age

4.3.5 Nearly 50% of frequent and infrequent cyclists in London are aged between 25 and 44¹⁷. Only one in six frequent cyclists is over 45. Children under 14 are the age group most likely to cycle at least once a week. (shown in Figure 4)

Figure 4 Cyclists by age¹⁸



Ethnicity

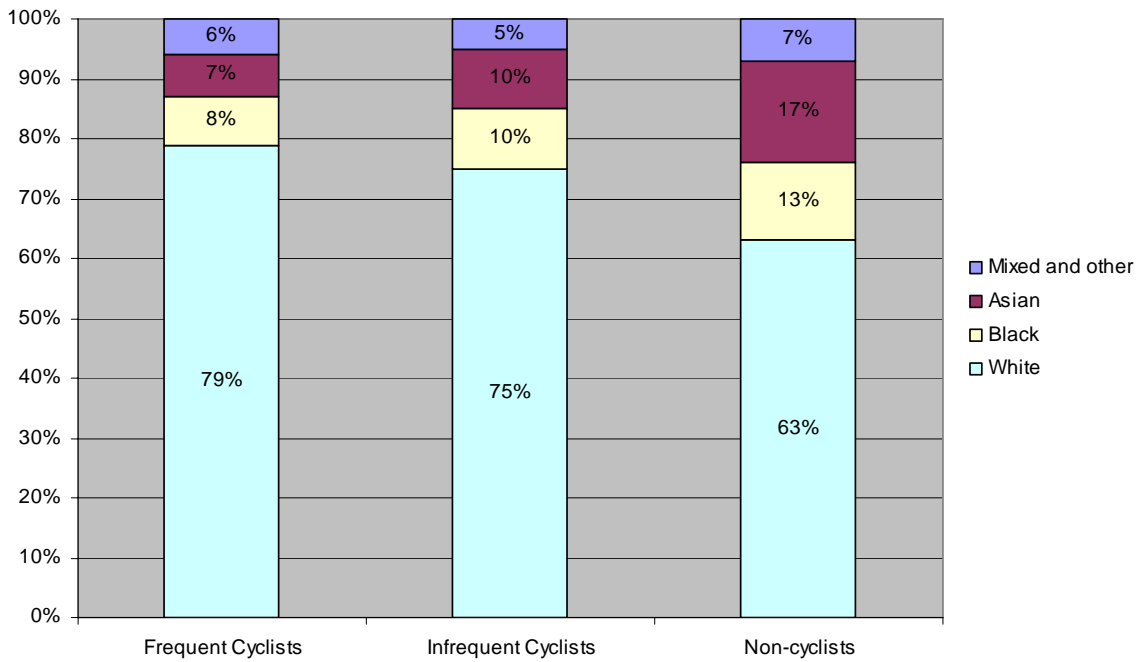
4.3.6 Eighty per cent of frequent cyclists and 75 per cent of infrequent cyclists in London are white¹⁹. Asian people are particularly unlikely to cycle frequently with only seven per cent of frequent cyclists being Asian, compared to 17 per cent of non-cyclists.

¹⁷ ibid

¹⁸ ibid

¹⁹ ibid

Figure 5 Cyclists by ethnicity²⁰



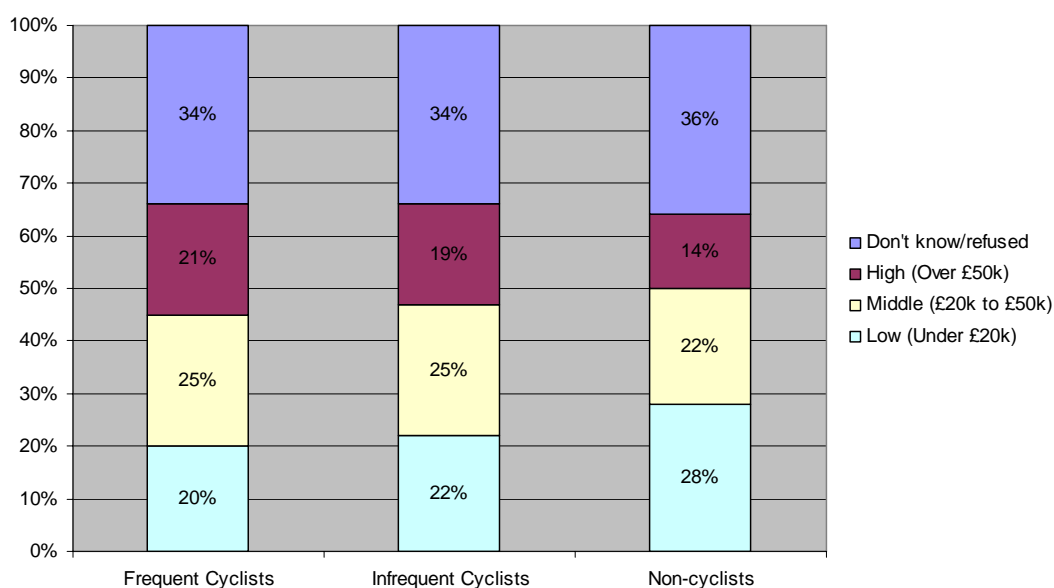
Income

4.3.7 Twenty eight per cent of non-cyclists have a household income below £20,000 per year, compared to 20 per cent of frequent cyclists²¹. Twenty one percent of frequent cyclists are high earners compared to 14 percent of non-cyclists

²⁰ ibid

²¹ ibid

Figure 6 Cyclists by income²²



4.4 London's economy

4.4.1 A report²³ on the contribution cycling makes to the British economy highlights the following findings:

Retail, manufacturing and services

- £2.9 billion gross value of cycling to the UK economy, equalling a gross cycling product of £230 per cyclist per year
- 3.7 million bicycles were sold in the UK in 2010 representing a 28 per cent increase over 2009 figures.
- bicycles sales in the UK in 2010 had a retail value of £1.62 billion
- £51 million of UK retail sales were for bicycles manufactured in the UK
- Around 2,000 retail stores currently operate across a spectrum of activities including sales, servicing, workshops, and other speciality areas
- There are around 1,000 additional independent specialist cycling shops

Value of individual cyclists

- the economic value of new recreational cyclists can be calculated as £320 per capita
- new cycle commuters are estimated to contribute £505 per head in terms of typical bicycle and accessory purchases

²² ibid

²³ The British cycling economy report. Gross Cycling Product Report. London School of Economics & Sky, 2011

Table 2 Value of individual cyclists by type²⁴

Major segments	Bike sales	Total Accessories	Total Market
Occasional Cyclist	£664m	£116m	£780m
Regular Cyclist	£529m	£106m	£635m
Frequent Cyclist	£430m	£530m	£960m
Total	£1.62bn	£752m	£2.9bn

Absenteeism and health factors

- Cycling to work is associated with less sickness absence, with regular cyclists taking on average 7.4 sick days per annum, compared to 8.7 sick days for non-cyclists
- Frequent cyclists save the economy £128 million in absenteeism per year and are projected to save a further £1.6 billion in absenteeism over the next 10 years

Projected socio-economic benefits of wider participation in cycling

- A 7 per cent rise in Frequent and Regular cyclists by 2013 could contribute £2 billion to the UK economy over the next two years
- Frequent and Regular cyclists could further save the economy £2 billion over a 10 year period in terms of reduced absenteeism
- A 20 per cent increase in current cycling levels by 2015 could save the economy £207 million in terms of reduced traffic congestion and £71 million in terms of lower pollution levels
- Latent demand for cycling could amount to around £516 million of untapped economic potential for the UK
- A 20 per cent increase in cycling levels by 2015 can save £107 million in reducing premature deaths and £52 million in NHS costs, and deliver £207 million and £71 million benefits in congestion and pollution

4.5 London's quality of life

4.5.1 The Inclusion London report²⁵ identified that disabled people living in London are more likely to live in rented accommodation with 48.7% of disabled people compared to 41% non-disabled people living in rented accommodation. More than half (53.1%) of disabled people rent their accommodation from the local authority or council whereas non-disabled people are most likely to rent from other individual private landlords (46.3%).

4.5.2 The Inclusion London report also noted that:
- the English House Condition Survey 2001 found that 36.5% of disabled people lived in 'non-decent housing' compared to 31.4% of non-disabled people.

²⁴ *ibid*

²⁵ Impact of spending cuts on deaf and disabled people in London. Inclusion London, 2011

- the GLA's London Housing Strategy (2010) states disabled people are more than twice as likely as non-disabled people to be living in unsuitable housing.
- A Habinteg Housing Association and London South Bank University survey (2010) which considered the 'unmet housing need' of wheelchair user households (i.e. only a section of disabled people) found that 78,300 such households had unmet housing needs in England, with an estimated 12,517 of these being in London.

4.5.3 With regards to household size, the Inclusion London report identifies:

- households with disabled adults are smaller than those without disabled adults. This difference is due to the number of dependent children living in both households: 21% of households with disabled adults have one or more dependent children living in them compared to 41.1% of households without disabled adults.
- households with disabled children are more likely to have a greater number of dependent children in them compared with households without disabled children
- households with disabled adults are most likely to consist of one adult (49.1%) whereas households without disabled adults are most likely to either consist of one (37%) or two adults (32%). This elements shows that disabled adults are more likely to live alone than non-disabled adults

4.5.4 The table below shows the comparison between the number of bedrooms per household for disabled and non-disabled people in London. The greatest difference is for the one bedroom category, which reflects the finding that 49.1% of households with a disabled adult are made up of that single adult.

Table 3 Percentage of disabled and non-disabled people by number of bedrooms in accommodation²⁶

Number of bedrooms	Disabled people	Non-disabled people
1 bedroom	19.6%	12.3%
2 bedrooms	28.6%	28.9%
3 bedrooms	37.4%	39%
4 bedrooms	11%	14%
5 bedrooms	2.7%	4.1%
6 bedrooms	0.7%	1.7%
Base	N=986	N=2,555

5. Sustainability objectives

5.1 Hazardous installations

5.1.1 Section 6 of the initial scoping report outlines that the establishment of appropriate objectives and guide questions is central to the sustainability assessment process and provides a way in which the performance and effect of the proposed early minor alterations can be identified and described.

²⁶ ibid

5.1.2 The initial IIA scoping report identified the objectives that related to the proposed changes associated with affordable rent and cycle parking standards. Below are the objectives considered relevant to hazardous installations.

Table 4 Key Sustainability Objectives for the IIA of Hazardous installations

Key Sustainability Objectives	Guide Questions	SEA Topic Requirement
<p>1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.</p> <p><i>Relates to Issue*: A</i></p>	<ul style="list-style-type: none"> • Will the regeneration have benefits for deprived areas? • Will it help to make people feel positive about the area they live in? • Will it help to create a sense of place and ‘vibrancy’? • Will it help reduce the number of vacant and derelict buildings? • Will it make the best use of scarce land resources and reuse brownfield sites? • Will it minimise impacts of development on the environment? • Will it help address contamination, including of land? 	<p>Material Assets, population</p>
<p>3. Health and Well-being. To maximise the health and wellbeing of the population and reduce inequalities in health.</p> <p><i>Relates to Issue*: D</i></p>	<ul style="list-style-type: none"> • Will it help reduce poverty and the impact of income inequality? • Will it help reduce health inequalities? • Will it help improve mental and emotional health? • Will it improve access to high quality public services (including health facilities)? • Will it help reduce the misuse of substances? • Will it help people to live an inclusive and active lifestyle? 	<p>Population, Health</p>
<p>4. Equalities. To ensure equitable outcomes for all communities, particularly those most at risk of experiencing discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings Londoners together.</p>	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas and communities most affected? • Will it remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination? • Will it promote a culture of equality, fairness and respect for people and the environment? • Will it promote equality for black and minority ethnic communities, women, women that are pregnant, people with children or caring responsibilities, disabled people, lesbians, gay men, bisexual and transgender people, people that are married or in a civil partnership, older people, young people, children and faith groups? • Will it meet the different needs of the equality target groups listed above? • Will it foster good relationships between people who share a protected character, as listed above, and those 	<p>Population, Health</p>

<p>Relates to Issue*: E</p>	<p>who do not have that characteristic, including tackling prejudice and promoting understanding?</p> <ul style="list-style-type: none"> • Will it promote adequate accessibility, in particular for older or disabled people? • Will it encourage persons in the groups listed above to participate in public life or in any other activity in which participation by such persons is disproportionately low 	
<p>5. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing.</p> <p>Relates to Issue*: C, F</p>	<ul style="list-style-type: none"> • Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate social and environmental infrastructure are in place for new residents? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it increase use of sustainable design and construction principles? • Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? • Will it ensure homes are well located in relation to flood risk? • Will it promote the increased supply of housing? 	<p>Population, Health, Material Assets</p>
<p>6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p> <p>Relates to Issue*: C, G</p>	<ul style="list-style-type: none"> • Will it help generate satisfying and rewarding new jobs? • Will it help to provide appropriate employment in the most deprived areas and stimulate regeneration? • Will it help reduce overall unemployment, particularly long-term unemployment? • Will it help to improve learning and the attainment of skills? • Will it encourage the development of healthy workplaces? • Will it provide employment in accessible locations? 	<p>Population, Material Assets</p>
<p>7. Stable Economy. To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green</p>	<ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it help to diversify the economy? • Will it support and prevent the loss of local businesses? • Will it encourage business start-ups and support the growth of businesses? • Will it encourage ethical and responsible investment? • Will it help reduce levels of deprivation? • Will it support the development of green industries and a low carbon economy? 	<p>Population, Material Assets</p>

<p>technologies) that minimise unsustainable resource use.</p> <p>Relates to Issue*: H, G</p>	<ul style="list-style-type: none"> • Will it support other niche or emerging sectors of the economy? • Will it help maintain London as an internationally competitive city? <p>Will it support the infrastructure required by a growing and changing economy?</p>	
<p>14. Liveability and Place. To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p> <p>Relates to Issue*: H, N</p>	<ul style="list-style-type: none"> • Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities? • Will it increase the provision of culture, leisure and recreational activities? • Will it support the provision of quality, affordable and healthy food? • Will it provide opportunities for people to choose an active, fulfilling life? • Will it increase the provision of key services, facilities and employment opportunities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it protect and enhance the provision of open space? • Will it help reduce actual levels of crime and antisocial behaviour? • Will it help reduce damage to the physical and natural environment? • Will it help reduce the perception of crime in an area? • Will it help reduce actual noise levels and disturbances from noise and other nuisance? • Will it protect and improve existing quality of life? • Will it help reduce the risk of terrorist attack? 	<p>Population, Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
<p>15. Open Space. To protect and enhance natural open space in London.</p> <p>Relates to Issue*: O</p>	<ul style="list-style-type: none"> • Will it protect and enhance areas of open space? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? • Will it address areas with deficiencies of access to open space? • Will it promote an appropriate range and type of open space uses? • Will it increase Londoners access for recreational purposes? • Will it promote urban greening? • Will it promote and support the function of the Blue Ribbon Network? 	<p>Biodiversity, Flora, Fauna, Landscape, Health</p>

* These objectives relate to a number of sustainability issues (presented in Section 5.2 of the initial IIA scoping report), however, only the principle issues are listed.

6. Options and alternatives for the sustainability appraisal

6.1 Developing the options and alternatives

- 6.1.1 As part of carrying out sustainability appraisal preferred policy options and alternative policy options are to be set out. A commentary should be provided to demonstrate why an option was chosen and others discounted. The initial IIA scoping report provided an early commentary on the options and alternatives for the proposed early minor alterations to the London Plan.
- 6.1.2 In considering potential options and alternatives to the approaches proposed, it is important to bear in mind two fundamental aspects of the proposed early minor alterations. First, they are based on a common approach to the two types of provision intended to meet the needs of those requiring affordable housing – affordable and social rent. This is based on the principle that they are intended to meet the same housing need, and that in practice there will be similarities between the two types of provision. Second, as required by Planning Policy Statement (PPS) 3 the approaches are informed by an appreciation of the scale and scope of the funding likely to be made available for affordable housing by national government. For the 2011-15 programme, it is clear that “Affordable Rent will form the principal element of the new supply offer”²⁷ and that “Social rent provision will only be supported in limited circumstances”²⁸. The preferred proposed approaches retain sufficient flexibility that policy can respond to any changes made for future programmes.
- 6.1.3 The definition of affordable rent was introduced through PPS3 for planning purposes. Ignoring this change to PPS3 would lead to a serious mismatch between London strategic planning policy, the Mayor’s London Housing Strategy and the Government’s affordable housing policies and programmes. Arguably, this would lead the Mayor to being in breach of his statutory duties to have regard to the need for consistency with national policy and between his own strategies; it would certainly result in a failure to provide the kind of strategic planning policy framework the London Plan is intended to give. The social rented and intermediate products are still available alternatives subject to resources, and the preferred options preserve flexibility to respond to any future changes in the balance between the two.

²⁷ DCLG/HCA, 2011-15 Affordable Homes Programme – Framework (2011), paragraph 1.3

²⁸ Ibid., paragraph 4.20

6.2 The Assessment

6.2.1 Below are the preferred option and alternative options for each of the proposed substantive changes to the London Plan. The preferred option is supported by a summary of the background to why it has been developed or why a change to policy is required. A consideration of whether changes need to be fully appraised is attached as Appendix 1.

Table 5 Proposed policy preferred options and alternatives

Policy	Alternatives	Reasons
Policy 3.10 Definition of affordable housing	Preferred option	
	A Affordable housing includes social rented, affordable rented and intermediate housing (see para 3.61), provided to specified eligible households whose needs are not met by the market and should:....	<ul style="list-style-type: none"> - the Government introduced the definition of affordable rent into PPS3 for planning purposes, resulting in the need to translate this into planning policy for London - prior to his endorsement of the London Plan, a commitment was made to the Secretary of State to introduce the definition of affordable rent into the London Plan - affordable rent is going to be the main product delivered based on the new funding model set out in the HCA's <i>Affordable Homes Programme Framework</i> and this has been taken forward by the Mayor and the Homes and Communities Agency in developing the 2011-15 London affordable housing programme and in proposals for a new London Housing Strategy. - the inclusion of the definition of affordable rent will enable the maximum delivery of affordable housing in London, enabling London to meet its housing target, also set out in the London Plan. This will have positive social and economic impacts for Londoners.
	Alternative options	
Not introducing the definition of affordable rent into the London Plan	<ul style="list-style-type: none"> - the definition of affordable rent has already been introduced at the national level in PPS3 and therefore would still apply for planning purposes - this would leave London's position ambiguous and could delay approvals and therefore delay the delivery of affordable housing as well as schemes required to delivery affordable housing as part of the wider proposal - if new affordable housing does not meet this definition, it is unlikely to receive funding and would result in less overall delivery of affordable housing in London due to viability of delivering schemes. This would have negative social and economic impacts for Londoners. 	

	Introducing a specific definition for London	<ul style="list-style-type: none"> - the definition of affordable rent for planning purposes would still exist in PPS3 - this would leave London's position ambiguous, in that it would be a departure from national policy, could delay approvals and therefore delay the delivery of affordable housing as well as schemes required to delivery affordable housing as part of the wider proposal - housing meeting another definition is unlikely to receive sufficient funding, and would result in less overall delivery of affordable housing. Other forms of below market cost/rent housing could still be provided where developers/land owners can fund such schemes without grant - this approach would not ensure the maximum provision of affordable housing nor assist in delivering London's housing target. It would not ensure the most efficient use of resources. This would have negative social and economic impacts for Londoners.
Policy 3.11 Affordable housing targets	Preferred option	
	<p>A The Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.</p> <p>LDF preparation</p> <p>B Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for:</p> <ul style="list-style-type: none"> • social/affordable rented; and • intermediate housing and reflect the strategic priority accorded to provision of affordable family housing. 	<ul style="list-style-type: none"> - the HCA's <i>Affordable Homes Programme Framework</i> sets out that social housing will only be funded in exceptional circumstances. Therefore, it will not be viable or feasible to continue to seek 60% of the overall provision of affordable housing solely as social rent. In addition, the PPS3 and the <i>Framework</i> imply that affordable rent is to meet the same housing need as social rent and therefore in line with the SHMA it is appropriate to seek 60% of the affordable housing proportion as social rent and affordable rent. Affordability will be addressed through the benefits system. - PPS3 excludes affordable rent from the definition of intermediate affordable housing - this approach will enable the maximum delivery of affordable housing and for London to meet its overall housing target. This would have positive social and economic impacts for Londoners.
Alternative options		

	<p>Not to include affordable rent as part of 60% target for overall proportion of affordable housing.</p>	<ul style="list-style-type: none"> - not identifying what proportion of affordable housing should be affordable rent in London would create uncertainty and delay the delivery of affordable housing as well as developments required to provide affordable housing as an element of the overall scheme - not identifying any proportion would also fail to provide strategic direction for London as to the mix of affordable homes that the Mayor would wish to see delivered to best meet London's housing need - this approach would not ensure the maximum provision of affordable housing and assist in delivering London's housing target. It would not ensure the most efficient use of resources. This would have negative social and economic impacts for Londoners.
	<p>To introduce a different split for delivery of social rent, affordable rent and intermediate affordable housing.</p>	<ul style="list-style-type: none"> - the HCA's <i>Affordable Homes Programme Framework</i> sets out that social housing will only be funded in exceptional circumstances. Therefore, it would not be viable or feasible to continue to seek any proportion of the overall provision of affordable housing as social rent. The need and ability to delivery intermediate housing remains largely the same, and the 40% target for intermediate housing was only recently tested through the London Plan replacement process including an examination in public. PPS3 and the <i>Framework</i> imply that affordable rent is to meet the same housing need as social rent and therefore in line with the SHMA it is not necessary to alter the proportions of the affordable housing elements. Affordability will be addressed through the benefits system. - there is no evidence to support a different split of affordable housing provision - this approach would not ensure the maximum provision of affordable housing and assist in delivering London's housing target. It would not ensure the most efficient use of resources. This would have negative social and economic impacts for Londoners.
	<p>To set separate targets for social and affordable rented housing.</p>	<ul style="list-style-type: none"> - this would be likely to reduce long-term flexibility and potentially require alteration of the London Plan for each affordable housing programme funding round as the balance between the two products shifts - in the short term, this approach would take insufficient account of the likely availability of resources, as under the current affordable housing programme social rent provision will only be supported in exceptional circumstances. Setting a separate target for social rented housing in these circumstances is unlikely to maximise affordable housing delivery.
Preferred options		

	<p>C LDF affordable housing targets should take account of:</p> <p>c the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.65 - 3.67, Supplementary Planning Guidance and the Mayor's London Housing Strategy</p>	<ul style="list-style-type: none"> - a reference to the Mayor's Housing Strategy reflects the Mayor's new role in delivery of housing in London. - referring to the Mayor's Housing Strategy in policy enables the Mayor to take the strategy into account in planning decisions - this will assist in maximising housing delivery in London, including affordable housing across London and good quality housing. This would have positive social and economic impacts for Londoners.
Alternative options		
	<p>Not including a reference to the Mayor's Housing Strategy.</p>	<ul style="list-style-type: none"> - this would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, potentially resulting in the housing target within the London Plan not being met. This would have negative social and economic impacts for Londoners - this could result in the Mayor being open to challenge that he has not had sufficient regard to the need to ensure consistency between his strategies (required by section 41(5) of the Greater London Authority Act 1999)
Preferred options		
	<p>D Affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the overall strategic priority to maximise affordable housing provision and the need to make best use of available resources, the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG. They should also provide a robust basis for implementing these targets through the development control process.</p>	<ul style="list-style-type: none"> - this reference will ensure the percentage of affordable housing sought is reasonable and delivery of affordable housing is maximised, in line with the overall housing target given constrained funding. This would have positive social and economic impacts for Londoners.
Alternative options		
	<p>Not to include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources.</p>	<ul style="list-style-type: none"> - without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. This would have negative social and economic impacts for Londoners.
Policy 3.12	Preferred option	

Negotiating affordable housing	A	The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to: g the priority to be accorded to provision of affordable family housing indicated in policies 3.8 and 3.11	<ul style="list-style-type: none"> - past funding models have made the delivery of affordable family sized housing less attractive - this approach is to ensure that the amount of family housing is maximised (based on the new agreements between the HCA and affordable housing providers), as families are one of the groups with the most need for affordable housing
	Alternative options		
		Not introducing a priority for family housing	<ul style="list-style-type: none"> - this approach could result in less delivery of family sized affordable housing; having negative social and economic impacts.
	Preferred option		
	C	Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.	<ul style="list-style-type: none"> - contributions towards affordable housing are occasionally being provided as payments in lieu but are being spent on affordable housing issues that do not result in the actual delivery of additional affordable housing. - this policy will give additional weight to the supporting text to ensure that the affordable housing provision results in additional affordable housing in line with the priorities outlined. In addition, it will enable the Mayor to ensure that boroughs' plans conform with this approach. - on-site provision is preferred due to the ability to design the additional provision into a scheme, and to ensure mixed and balanced communities.
	Alternative options		
	Not introducing the criteria into policy.	<ul style="list-style-type: none"> - boroughs and developers may be unclear about the priority the Mayor places on actual delivery of additional affordable housing and of mixed and balanced communities. This would not contribute towards meeting London's housing needs and would have negative social and economic impacts for Londoners. 	
	Setting out a different order of priorities or not covering some types of delivery such as funding agreed programmes for the provision of affordable homes.	<ul style="list-style-type: none"> - another approach would not maximise the delivery of additional affordable housing nor ensure mixed and balanced communities. - a less flexible approach could result in less efficient use of resources. This would not contribute towards meeting London's housing target and would have negative social and economic impacts for Londoners. 	
Policy 5.22	Preferred option		

Hazardous substances and installations	A The Mayor will work with all relevant partners to ensure that hazardous substances, installations and materials are managed in ways that limit risks to London’s people and environment. He will consider publishing supplementary guidance to support the application of this policy.	<ul style="list-style-type: none"> - developers and decision makers are sensitive about schemes near hazardous installations. These sensitivities could delay housing delivery and regeneration of areas. - this policy change will give additional weight to any SPG the Mayor publishes in relation to hazardous substances and assist in resolving sensitive matters in line with Circular 1/2008. This could give developers and decision makers the confidence to bring forward schemes near hazardous installations which would help meet London’s housing target and result in positive social, economic and environmental benefits.
	Alternative options	
	Not introducing a link to a potential SPG.	<ul style="list-style-type: none"> - this would limit the weight of any SPG on hazardous substances as paragraph 2.22 of Circular 1/2008 - Strategic Planning in London sets out that additional guidance set out by the Mayor <i>should clearly be referenced to the relevant plan policy which it supplements.</i>
Policy 6.9 Cycling	Preferred option	
	Updated standards as per the proposed table.	<ul style="list-style-type: none"> - increasing the number of people cycling and the cycling modal share is a priority for the Mayor. Paragraph 6A.11 of the London Plan states that TfL intends to carry out a review of cycle parking standards, and will bring forward early alterations to this Plan when new standards are available. - TfL has evidence to support new standards for some land uses. - this approach will result in additional cycle parking being provided predominantly on-site. This would give cyclists the confidence to bring their bicycles to work, live or places of interest as secure parking would be provided. - cycling generally has health, congestion and air quality benefits. - securing spaces predominantly on-site reduces clutter in the street, increasing pedestrian safety.
	Alternative options	
Not to update standards	<ul style="list-style-type: none"> - this would be contrary to the Mayor’s priority and the commitment made in the London Plan. - it would result in sustained or increased congestion for existing cycle parking and could result in additional clutter in the street. This in turn can create obstacles for pedestrians, especially for those with disabilities. - not providing additional cycle parking spaces at workplaces and other venues could deter people from cycling to work or around London due to lack of safe and easy storage for their bicycles. This would limit benefits to health, reducing congestion on the road and public transport and air quality. 	

	Up date all the cycle parking standards.	<ul style="list-style-type: none"> - there is insufficient evidence at this stage to update the remaining cycle parking standards. TfL are preparing further evidence and it is likely that additional alterations will be made to the London Plan in due course.
	Have lower or higher standards	<ul style="list-style-type: none"> - there is insufficient evidence at this stage to propose alternative cycle parking standards. - lower standards would not support the Mayor's ambitions that cycle represents 5% of the transport mode in London by 2026. This would limit benefits to health, reducing congestion on the road and public transport and air quality. - TfL are preparing further evidence and it is likely that additional alterations will be made to the London Plan in due course.

Appendix 1

Consideration of the need for full appraisal of proposed London Plan early minor alterations

Policy to be changed	Proposed change	Effect	Substantive change requiring IIA appraisal?
Overview and introduction	Insert paragraphs on the status of the London Plan following the consultation of the draft National Planning Policy Framework.	Provides clarity on the status of the London Plan in relation to changing national policy. No change to the overall policies in the Plan.	no*
Policy 3.8 Housing choice	Insertions into paragraphs to note affordable rent to meet same need as social rent, and to include references to affordable rent.	Adds and replaces references to affordable rent as part of affordable housing and notes the Government's intention that it meets the same need as social rent. No change to the overall policy, but provides consistency with affordable housing policies.	no
Policy 3.9 Mixed & balanced communities	Insertion of affordable rent into supporting text.	Notes affordable rent has a role to help achieve mixed and balanced communities. No change to the overall policy, but provides consistency with affordable housing policies.	no
Policy 3.10 Definition of affordable housing	Policy change to include affordable rent as part of affordable housing. In the supporting text includes a definition for affordable rent and updates definition of social rent and intermediate rent, including household income range.	Provides policy backing to affordable rent as affordable housing. Provides details and updates definitions for each element of affordable housing.	yes
Policy 3.11 Affordable housing targets	Policy change to include affordable rent as social rent and to note priority to maximise provision of affordable housing. Delete reference to Housing SPG in relation to affordable rent.	Provides policy backing for affordable rent as part of the 60% provision of overall affordable housing provision and reflects role of Mayor's Housing Strategy to deliver affordable housing in London.	yes
Policy 3.12 Negotiating affordable housing	Policy change to state the affordable housing priority is for family housing. Policy change to state how affordable housing should be delivered. Additional support text outlines how the policy should be applied.	Policy change gives more emphasis to provide affordable family housing. Policy change gives more weight to how affordable housing should be delivered.	yes

Policy 5.22 Hazardous substances and installations	Policy change to state the Mayor may produce guidance.	No change to the effect of overall policy but would give weight to any supplementary planning guidance produced in accordance with paragraph 2.2 of Circular 1/2008.	yes**
Policy 6.9 Cycling	Policy - Table 6.3 updated to increase cycling parking required in office developments, student housing and others. Supporting text - clarification on how cycle parking is to be provided	Requires more cycle parking spaces for some developments.	yes
Parking Addendum	Additional supporting text to reflect the Mayor's intentions with regards to car parking following statements by the Government. No change to policy.	Provides additional advise, but no change to policy.	no
Glossary	Delete the definition of 'air quality neutral'	No change to policy.	no*

* the independent consultants who will carry out the full IIA were asked their opinion as to whether these two specific proposed changes needed to be appraised. Their opinion was that they did not.

** this is change post Assembly and functional bodies consultation



Meeting Notes

Project Name: IIA workshop	Project No.:
Subject: Mayor's Housing Equalities Standing Group	Meeting No.: 1
Venue: GLA City Hall - Committee Room 4	Date and Time: 9.30am 18/11/11
Attendees	Apologies
Christopher Peck - CTC David Beyt - GLA - Health Louise Hurst - GLA Health Julie Fleck - GLA Access Sue Johnson - GLA Equalities Malcolm Souch - HUDU Salima Khatun - GLA Housing Tom Bogdanowicz - London Cycling Campaign Celeste Giusti - GLA London Plan Jane Carlsen - GLA London Plan Nicky Hodges - URS Scott Wilson Thomas Quick - URS Scott Wilson	

ITEM	NOTES
	<p>Cycle Standards Policy Changes</p> <p>Baseline Comment that the baseline information was not particularly up to date. Much of the data for the baseline referred to changes between 2008 and 2009. Referred to the <i>National Travel Survey</i> on the number of people commuting by bike</p> <p>Questioned whether it was appropriate to have a uniform cycling standard for inner and outer London given that there are divergent patterns of cycle usage between the two. The prevalence of cycling in outer London is much lower than in central London but is predicted to increase.</p> <p>A survey (TFL: <i>'delivering the benefits of cycling in outer London'</i>) concluded that 50% of trips undertaken in outer London are under 2 miles in distance and therefore cycling is an option. There is therefore great potential to increase cycling in outer London.</p> <p>Concern raised that many boroughs have incorporated existing guidance on cycle provision into their development plans. The guidance they are using relates to 2004 TFL data which in turn relates to 1998 standards.</p> <p>Cycle provision in offices: Referred to best practice demonstrated by Deloitte who had a ratio of bikes to user of 1:8. Also stated that where cycle provision is included in offices those spaces are used and not left vacant (anecdotal).</p>



Meeting Notes

Noted that the standards, while seen as a minimum in policy will often be treated as a maximum by developers.

Cycle security:

Referred to a *survey* which shows that about a quarter of people who have their bike stolen stop cycling and about 60% cycle less frequently. Therefore safe and secure provision is important..

Referred to the standards in *Cambridge and the standards in the Borough of Hillingdon* which were deemed Best Practice.

The London Plan standard does not specify that cycle storage should be covered and secure. Belief that there should be a statement in the plan requiring safe and secure facilities.

Student accommodation

Evidence from universities and student halls that cycle provision is inadequate at present (anecdotal)

The construction of student accommodation can be classified either as speculative development by private developers or provided specially by universities.

It was stated that speculative developments are much less likely to meet the standards than buildings designed specifically to be student residences.

Stated that there is insufficient cycle storage at stations at the moment.

Public health perspective

More information on demographics in the baseline would be helpful. For example, there is a ratio of 3:1 male to female cyclists at present. Evidence suggests that once there are greater numbers of cyclists on the roads the number of female cyclists increase. The provision of adequate cycle storage and facilities at places of work is also important.

Benefits of increasing cycle provision standards: health, community, safety and fitness.

For health data referred to *CILT site*, which provides comprehensive reviews of the data

Disabled User perspective:

If you increase cycle parking facilities then there will be fewer cycles tied up to 'street furniture', which is often difficult to get past for disabled people.

Expressed desire to see good practice guidance on the provision of cycle facilities for disabled people.

	<p>Equalities</p> <p>Cycling has a positive benefit on income equality as it is a cheap mode of transport.</p> <p>Other points</p> <p>Concern raised that these cycle standards refer to new developments. Due to the difficulty of retrofitting cycling facilities to old buildings, the point was raised that the new standards should be more ambitious to take up for existing poor provision.</p> <p>Clarification by GLA officer that the standards will apply to major refurbishments that apply for planning permission as well</p> <p>Provision of cycle facilities for residential buildings. While improving cycle facilities for offices is positive if there is no improvement for residential areas then beneficial impacts might be reduced (issues of bike security in residential flats)</p> <p>Additional studies</p> <p><i>Dr Bob Davis in Ealing and Trevor Parsons in Hackney have worked on provision of cycle facilities for residential users.</i></p> <p><i>'Age well project' has produced various statistics on the age profile of cyclists</i></p> <p><i>The British cycle economy – LSE study</i></p> <p><i>London Councils Report – Benefits of Cycling</i></p>
	<p>Affordable Rent Policy Changes</p> <p>Baseline</p> <p>More info on income levels and types of households that will typically use affordable housing should be included in the baseline. Demographic information is key. Note GLA decision to await 2011 census evidence.</p> <p>Referred to the <i>House and Communities Agency</i> which looks at what housing associations are intending to charge under the new context</p> <p>Spatial variation in terms of meeting needs in different parts of London</p> <p>Referred to the <i>CLG assessment of their housing strategy</i></p> <p>Disabled people</p> <p>The 10% guide which applies to both social and affordable housing. Asked what the impact of that universal guideline would be</p> <p><i>Inclusion London</i> – done some work on the impact of the changes to the housing benefit on disabled people.</p>



Meeting Notes

Possible benefit of the plan. The fact that if a developer cannot provide disabled access on the site they are required to provide it somewhere else.

Benefits

Main benefit is that it will keep the supply of housing going. It will increase house and jobs. This is guaranteed up to 2015.

Noted that there had been a dramatic decrease in government contribution to affordable rent. It used to be around 100K per XX but is now down to 30K. RPs may be able to pick up the slack but there are limits to their borrowing powers.

Health

Currently overcrowding is a big issue with poor sanitation and psychological illnesses resulting from the cramped conditions.

Chartered institute for Environmental Health has done some work on this.

Pointed out the large uncertainties surrounding the potential impacts

Other points

People will have to be more mobile which will have a range of detrimental impacts stemming from uprooting individuals from social infrastructure and communities. However, it was noted that there might be some beneficial impacts with people who are no longer able to manage their large house getting newer and more manageable houses.

Notes By: Thomas Quick / Nicky Hodges