

# **THE LONDON PLAN**

SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON

**REVISED EARLY MINOR ALTERATIONS**

# **SUSTAINABILITY STATEMENT**

**OCTOBER 2103**

**GREATERLONDONAUTHORITY**

## **Revised Early Minor Alterations to the London Plan Sustainability Statement**

### **1. Introduction**

- 1.1 This Sustainability Statement, also known as a post adoption statement for the purposes of the Environmental Assessment of Plans and Programmes (EAPP) Regulations 2004, confirms that the Revised Early Minor Alterations (REMA) to the London Plan have been published on 11<sup>th</sup> October 2013 and along with this Sustainability Statement can be viewed at City Hall free of charge, during its opening hours or found on the Greater London Authority's web-site [www.london.gov.uk](http://www.london.gov.uk). Publication is confirmed by a statutory notice published in the London Gazette on the same day and an advertisement in the London Evening Standard.
- 1.2 In accordance with the requirements of Article 9(1) of the European Directive 2001/42/EC1 (known as the Directive on Strategic Environmental Assessment (SEA)), the EAPP Regulations 2004 and Government guidance on sustainability appraisal this statement outlines the sustainability considerations that have been integrated into the REMA<sup>1</sup> prior to their publication, the reasons for choosing the preferred policies, and measures for monitoring the REMA as part of the overall London Plan. Appendix 1 sets out the specific environmental aspects considered during the development of REMA, as required by the European Directive on SEA and EAPP Regulations 2004. Appendix 2 sets out the specific considerations in relation to equalities to demonstrate the Mayor and the GLA have met their requirements under the GLA Act 1999, as amended and the Equality Act 2010.
- 1.3 The following information reflects the outcomes of the Integrated Impact Assessment (IIA) including the sustainability appraisal that was undertaken, and comprises the final step of the assessment process as part of the implementation, monitoring and formal publication process of REMA.
- 1.4 The IIA was undertaken by independent consultants and was produced in an integrated way to meet the requirements of strategic environmental assessment, health impact assessment, equalities and community safety legislation. The result was an Integrated Impact Assessment Report, which enabled the Mayor both to meet the requirements of the European Directive on Strategic Environmental Assessment, and to meet his duties under the Greater London Authority (GLA) Acts 1999 and 2007, equalities and other legislation to take account of a range of matters including:
- Economic development and wealth creation;
  - Social development;
  - Improvement of the environment;
  - Community safety;
  - Health inequality and promoting Londoners' health; and
  - Equality of opportunity, elimination of discrimination and the promotion of good community relations.
- 1.5 This integrated approach reflects the Greater London Authority's agreed methodology for impact assessment of strategies and policies, and has been used consistently in assessing the London Plan and alterations to it.

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<sup>1</sup> REMA includes an earlier proposed alteration known as the Early Minor Alterations (EMA) to the London Plan.

- 1.6 In keeping with best practice, the IIA for REMA has built on that carried out for what became the replacement London Plan published in July 2011.

## **2. The Alterations**

- 2.1 The REMA to the London Plan incorporates two sets of alterations.

### **The early minor alterations to the London Plan**

- 2.2 The early minor alterations (EMA) to the London Plan were first published for consultation with the London Assembly and GLA functional bodies. However, the GLA practice had been to also make this consultation available for comment from the wider public. The consultation ran over November and December 2011. These alterations dealt with:
- the (then forthcoming) draft National Planning Policy Framework,
  - affordable housing,
  - cycle parking standards, and
  - a clarification of a definition in the London Plan glossary for 'Air Quality Neutral'.
- 2.3 On 1<sup>st</sup> February 2012, the Mayor approved publication of the EMA to the London Plan for a 12 week period for the purposes of public consultation. In addition to the above alterations, alterations relating to planning for hazardous installations were included for this round of consultation.

### **The revised early minor alterations to the London Plan**

- 2.4 In March 2012, the Government published its National Planning Policy Framework (NPPF). This sought to provide a concise statement of national planning policy, replacing the former national Planning Policy Guidance (PPG) and Planning Policy Statements (PPS). To ensure the London Plan reflects the NPPF, revised early minor alterations (REMA) were proposed. These alterations dealt with:
- updating cross references to reflect changes in national guidance;
  - consistency with the NPPF, including adding references to local energy generation, local open spaces, noise, marine policy, definition of heritage assets;
  - updates to reflect the changes in health and social care provision, including the Mayor's role to address health inequalities;
  - housing, including affordable housing, for service families, for gypsies and travellers (to reflect new national planning policy for travellers sites); and
  - the Community Infrastructure Levy.
- 2.5 The REMA to the London Plan were consulted on for a six week period from June 2012.
- 2.6 Not all of these alterations involved significant policy changes that needed to be appraised through the IIA. A justification as to which policies involved substantive changes and therefore required appraisal is contained in the Appendix to the Scoping Reports<sup>2</sup>.

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<sup>2</sup> The Scoping report for the Early Minor Alterations to the London Plan (Assembly and Functional bodies version) November 2011- <http://www.london.gov.uk/sites/default/files/early-minor-alteration-lp-scoping-report.pdf>  
The Early Minor Alterations to the London Plan Scoping report addendum January 2012 - <http://www.london.gov.uk/publication/early-minor-alterations-london-plan>

### **3. Integrated Impact Assessment**

- 3.1 The EAPP Regulations 2004 require this Sustainability Statement to set out how the environmental considerations have been integrated into REMA. The substantive policy changes proposed by EMA and REMA were informed by Integrated Impact Assessments (IIAs). The IIA not only considered the environmental aspects of the alterations but also the Mayor's other duties as outlined below.
- 3.2 The Mayor has legal duties to consider the following:
- Economic development and wealth creation (GLA Act 1999, as amended);
  - Social development (GLA Act 1999, as amended);
  - Protection and improvement of the environment (European Directive 201/42/EC on SEA, The Environmental Assessment of Plans and Programmes Regulations 2004, GLA Act 1999, as amended);
  - Health inequality and promoting Londoners' health (GLA Act 1999, as amended);
  - Community safety (Crime and Disorder Act 1998, Police and Justice Act 2006); and
  - Equality of opportunity, elimination of discrimination and the promotion of good community relations (GLA Act 1999, as amended, Equality Act 2010).
- 3.3 The GLA adopts an integrated approach to demonstrate how these duties have been considered in the form of an Integrated Impact Assessment. This enables any common themes to be considered together.
- 3.4 The EMA and REMA IIA built on the IIA that informed the replacement London Plan 2011. The IIA was undertaken by independent consultants.

#### *Habitats Regulation Assessment*

- 3.5 Regulation 48(1) of the Habitats Regulations 1994, which implements Article 6(3) of the Habitats Directive (92/43/EEC) requires an appropriate assessment also known as a Habitats Regulation Assessment (HRA) to be undertaken in respect of any plan or project which:
- a. either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and
  - b. is not directly connected with the management of the site for nature conservation.
- 3.6 As outlined in the Scoping Report to EMA, the proposed alterations were limited in scope, and only concern policies that the original HRA concluded have no mechanisms for impact on any European sites. Therefore the early minor alterations and updates to the existing HRA of the London Plan were scoped out. Natural England indicated that it was happy with this approach.

#### **Scoping reports**

- 3.7 The role of the scoping report is to set the framework for the IIA by identifying the sustainability objectives and framework as well as providing background to and identifying trends in the policy areas being altered.

- 3.8 The EMA IIA Scoping Reports were prepared in-house with a ‘critical friend’ review by the independent consultants who carried out the full IIA assessment. The guide questions were updated during the review of the overall sustainability objectives. Taking into account the ‘critical friend’ review the draft scoping report was updated to:
- include discussion on the key documents and strategies
  - discuss the link of the proposed policy changes on wider plans, programmes and strategies
  - identify potential implications of not introducing the proposed policy
  - identify possible gaps in the baseline information
  - identify further baseline information, where available in relation to the objectives on regeneration and land-use, health and well-being, equalities, housing, built and historic environment, liveability and place and air quality
  - refer to the stakeholder input during the development of the IIA Scoping report
- 3.9 A further Scoping Report was prepared for REMA to address the additional policy areas that were proposed to be altered covering housing for service families and identifying sites for gypsies and travellers. This followed the same format as the Scoping Report for EMA, taking into account the advice from the consultants.

*Consultation and engagement*

- 3.10 The Scoping Reports were developed with a range of input across the GLA, including the GLA Diversity and Social Policy Team, the Housing Team and advice from independent consultants appointed by the GLA to prepare the full IIA. The consultants reviewed a draft of the scoping report and provided feedback to ensure it met the requirements set out in legislation and guidance on each of the IIA elements. The scoping report and full IIA were prepared in conjunction with that for the Mayor’s draft Housing Strategy. This enabled the synergies between the two strategies to be identified.
- 3.11 A workshop with stakeholders was held on 18 November 2011. The suggested relevant baseline information and issues identified were included in the draft Scoping Report. The meeting note for the workshop is attached as Appendix 2 to The Early Minor Alterations to the London Plan Scoping report addendum January 2012<sup>3</sup>.
- 3.12 As required by the Regulations, the statutory consultees (Natural England, the Environment Agency and English Heritage) were invited to comment on the Scoping Report prior to the formal consultation of the IIA, alongside EMA and then REMA.
- 3.13 The Environment Agency responded, stating that:  
‘We support the approach taken by the GLA for this IIA, which is based upon the baseline data, IIA key issues and objectives identified for the IIA of the London Plan 2011. We agree with the proposed use of only the IIA objectives that are relevant to the scope of the early alterations.’

As we provided input at various stages of the IIA process for the London Plan 2011 and as these alterations have limited applicability to our core remit, we do not have any specific comments to make.’

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<sup>3</sup> <http://www.london.gov.uk/priorities/planning/london-plan/early-minor-alterations>

- 3.14 English Heritage responded, stating that:  
‘In terms of the IIA we acknowledge that the nature of the alterations proposed may have limited impact upon the historic environment. However we would still suggest that the IIA considers the historic environment in its broadest sense, and does not limit itself to designated heritage assets only. A robust baseline understanding of the London’s historic environment is important so that its contribution to the sustainable development can be established. The subsequent analysis should then identify any potential issues and opportunities which may need to be addressed as a result of the proposed alterations to the London Plan.’
- 3.15 Following the receipt of these comments no substantial changes were made to the Scoping Report. It is considered that the built and historic environment was considered sufficiently in the Scoping Report through the background information, the sustainability objectives and clear links to the IIA for the full London Plan 2011.

### **The Integrated Impact Assessment**

#### *The Integrated Impact Assessment findings*

- 3.16 The full IIA report was prepared by consultants who used the assessment to also prepare a specific Equalities Impact Assessment. The consultant’s assessment was informed by the Sustainability Appraisal contained in the Scoping Report, including the alternative options. The Sustainability Appraisal assessed the preferred proposed alterations and their alternatives against the sustainability objectives. These objectives included environmental considerations such as biodiversity, air quality and climate change as well as equalities considerations plus health and well-being and accessibility and mobility. Following are the key findings from the IIA on the main policy areas that were altered.

#### *Alterations to Affordable Housing Policy*

‘These alterations are likely to support the sustained delivery of new affordable housing. This should have an overall positive impact on regeneration and land use, equalities, health and wellbeing, housing, employment, stable economy, liveability and place and other objectives.

However, uncertainty regarding the national introduction of Affordable Rent and the complex relationship with the welfare reforms makes it difficult to be certain about how households will respond to offers of Affordable Rent housing. This makes uncertain the extent to which potential positive impacts for equality, health and well-being as well as for regeneration and liveability objectives will be realised. Both the EMALP and the revised LHS, supported by negotiations by the Mayor/HCA with registered providers, include measures to mitigate problems of affordability.’

#### *Alterations to Hazardous substances and installations policy wording*

‘This alteration is likely to provide greater certainty for developers and more robust assessments, in order to support increased delivery of new housing schemes as well as potential new green open spaces on large SHLAA sites near hazardous installations. This can support regeneration and more efficient land use, as well as supporting health and well-being, housing, liveability and place objectives. These benefits are likely to be particularly important in areas of existing deprivation, so

may contribute to achieving equality objectives and addressing health inequalities. Evidence shows that there are already a higher number of sites in deprived areas near Hazardous Installations, so this will potentially further the positive impacts of the EMALP.’

#### *Alterations to Cycle parking standards*

‘The alterations will increase provision of cycle parking, including more secure off-street/on-site parking. This may contribute towards the achievement of the Mayor’s target to improve rates of cycling in London.

The improved standards will encourage more cycling, enhancing health and wellbeing, promoting widened uptake of cycling and improving the quality of life for those living and working in London.

The standards may achieve some economic benefits, in part by encouraging more active, healthier lifestyles.’

#### *Housing for specific groups*

‘It is considered that there are unlikely to be any major significant effects due to the introduction of the proposed revised early minor alterations to the London Plan. This is mainly because the policy approaches have already been introduced through national policy.

Overall there will be a minor positive effect due to the introduction of the proposed revised early minor alterations to the London Plan as they provide a London context to a national policy approach. The important elements are that the revisions seek to ensure London’s housing needs are met and that these needs are to be identified through the London SHMA as well as boroughs’ SHMAs and Local Plans.’

- 3.17 One of the roles of the IIA is to recommend improvements to policies, or groupings of policies as well as recommend measures for monitoring. The proposed policy changes are considered minor and are not a full review of the London Plan so the assessment took into account the wider London Plan policies which remain largely unchanged in protecting the environment and seeking social benefits from developments including mixed and balanced communities. The IIA recommendations are set out below. Section 4 of this report sets out how REMA responded to these recommendations as well as the consultation responses.

#### *Alterations to Affordable Housing Policy*

‘We recommend the Mayor work closely with the Department for Work and Pensions and the Department for Communities and Local Government to monitor and review the actual cumulative effects of these policy changes for Londoners, with an emphasis on identifying patterns that indicate groups of people sharing protected characteristics are differently affected.’

#### *Alterations to Hazardous substances and installations policy wording*

‘No recommendations.’

*Alterations to Cycle parking standards*

‘We recommend the Mayor:

- with TfL and other partners, consider how future changes to standards regarding cycle parking provision at domestic and other use classes can support increased uptake of cycling by lower income individuals and households. This is principally in order to contribute to equality and health equality objectives;
- reflect further on the merits of the alternative option of higher standards of cycle parking, drawing on the suggestions put forward by the London Cycle Campaign. This should include balancing up the potential health and economic benefits of increased cycling rates, as identified in the LSE/Sky report, against the costs associated with higher levels of cycle parking provision;
- continue to promote measures to reduce incidences of cycling accidents in London, in order to contribute to health equality and liveability objectives;
- consider including explicit wording to ensuring improved provision includes cycle parking suited to the needs of disabled cyclists;
- consider responses by the City of London officer and the London Cycle Campaign to introduce specific cycle parking standards for stations or to strengthen the power of TfL to require implementation of agreed cycle parking provision at stations; and
- consider the response by LB of Bromley to strengthen wording in para 6.35 to safeguard against developers unwilling to meet the improved cycle parking standards.

*Housing for specific groups*

‘In preparing this IIA a limited number of recommendations have been identified. These include:

- as for the IIA for the early minor alterations that the Mayor works with the Department of Work and Pensions and the Department for Communities and Local Government to monitor and review the cumulative effects of the overall affordable housing policy changes for Londoners, with an emphasis on identifying patterns for groups of people sharing protected characteristics
- to consider service personnel in the London Strategic Housing Market Assessment
- to engage with Mayor’s Housing Team and Department for Communities and local Government about planning requirements for service personnel
- to monitor gypsy and traveller sites and pitches outputs by boroughs’

**Consultation responses to EMA and REMA**

- 3.18 There are requirements to consult on the proposed policy changes as well as the IIA that informed the proposed alterations. The EAPP Regulations 2004 require this Sustainability Statement to set out how any opinions received have been taken into account.

*Responses from the statutory consultees*

- 3.19 Following are the responses received from the statutory consultees. Section 4 of this report sets out how REMA responded to these recommendations.



*The Early Minor Alterations*

3.20 English Heritage stated:

‘Based upon the information provided, English Heritage has no comments to make on the proposed alterations to the London Plan.

In terms of the IIA we acknowledge that the nature of the alterations proposed may have limited impact upon the historic environment. However we would still suggest that the IIA considers the historic environment is in its broadest sense, and does not limit itself to designated heritage assets only. A robust baseline understanding of the London’s historic environment is important so that its contribution to the sustainable development can be established. The subsequent analysis should then identify any potential issues and opportunities which may need to be addressed as a result of the proposed alterations to the London Plan.’

3.21 The Environment Agency confirmed:

‘We have no comments to make on the Addendum to the Integrated Impact Assessment Scoping Report or the Integrated Impact Assessment Report itself.

*The Revised Early Minor Alterations (Supplementary IIA)*

3.22 The Environment Agency state it had

‘No comments to make’.

3.23 English Heritage stated

‘the historic environment should be considered in its broadest sense, and not be limited to designated heritage assets only. A robust baseline understanding of London’s historic environment is important so that its contribution to sustainable development can be established. The subsequent analysis should then identify any potential issues and opportunities which may need to be addressed as a result of the proposed alterations to the London Plan.

An example of where the impact of the revised minor alterations to the London Plan on the historic environment appears not have been fully explored is in relation to the Key Sustainability Objectives (Table 1). There is no mention of the historic environment or cultural heritage in any of the sustainability objectives listed. Where an opportunity does exist to make a link to the historic environment (e.g. under point 14 Liveability and Place) there are no questions posed in the ‘Guide question’ that asks what impact would the revised London Plan have upon the conservation of heritage assets and the wider historic environment. This lack of consideration of the historic environment as a component of sustainable development should be addressed.’

3.24 Natural England stated

‘the issues of interest to Natural England have been considered within this document and the approach and methodology used is acceptable.’

*Wider consultation responses*

3.25 Following is a short summary of the wider responses relevant to the IIA considerations received to the consultation of EMA and REMA. All the comments received during the EMA consultation to the Assembly and the GLA functional bodies are published on the

GLA web-site<sup>4</sup>. The Statements on matters for the Examination in Public are also available from the GLA web-site<sup>5</sup>.

*The Early Minor Alterations*

- 3.26 Approximately 41 responses from a range of boroughs, developers, amenity groups, public bodies and other stakeholders were received on EMA.
- 3.27 Most comments were generally supportive but there were detailed comments in support and objecting to various proposed policies, especially the proposed affordable housing policies where further evidence was also requested. There were requests to consider local circumstances for the proposed affordable housing policies and cycle parking standards.
- 3.28 One objection states that no real evidence has been produced to show what the likely implications of affordable rent might be. It was suggested that:
- ‘Equalities implications of different tenures of affordable housing should also be considered. Registered providers should also be mindful of the above considerations when designing new schemes and in determining the rates of conversion of their existing social stock to AR, particularly in areas such as inner London where house prices and rent levels are very high and the differences between rent levels in social rented housing and AR housing would be very significant.’
- 3.29 The objection states that the Mayor should produce evidence regarding the equalities impacts or should enable flexibility to the boroughs to tailor their policy approach to affordable rent to mitigate negative equalities impacts. Another respondent stated that the proposed changes to affordable housing conflict with the Mayor’s duties to tackle deprivation and inequality among Londoners.

*The Revised Early Minor Alterations (Supplementary IIA)*

- 3.30 Approximately 69 responses from a range of boroughs, developers, amenity groups, public bodies and other stakeholders were received on REMA.
- 3.31 Again there were quite detailed submissions in support of and objecting to the changes in affordable housing policy. There were significant concerns raised regarding the boroughs not being able to set local rents and the impact on equalities. One borough stated its evidence indicated specific equalities groups are likely to be more affected by affordable rent housing, while a number of others put forward information about likely local impacts of the policy. It was suggested that the equalities implications of different tenures should be considered and where boroughs can demonstrate that a particular type of affordable housing might have equalities implications on certain equalities groups locally, those boroughs should be able to tailor their local policies to reduce the likelihood of such potential implications occurring.

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<sup>4</sup> <http://www.london.gov.uk/priorities/planning/london-plan/early-minor-alterations>

<sup>5</sup> <http://www.london.gov.uk/priorities/planning/london-plan/examination-in-public/statements-matter-1>

- 3.32 Equalities and human rights were raised in regards to the proposed approach to gypsy and traveller policies. It was suggested that the Mayor should use his strategic role to fulfil his duty for equalities with regards to identifying gypsy and traveller sites.
- 3.33 Pan London housing targets were sought for specific groups with protected characteristics.
- 3.34 It was suggested that there should be an improved collection of data on protected characteristics, including sexual orientation and gender identity to support health inequalities being addressed.
- 3.35 A respondent agreed that the cumulative impact of these changes are uncertain, but that monitoring would be insufficient and that a review of the Housing Needs Assessment needed to be carried out and review housing targets reviewed regularly.
- 3.36 There was general support for the proposed alterations that acknowledged the changes in the health system, but respondents requested that the Mayor's role in reducing health inequalities be noted by the alterations. It was also suggested that a greater link be made to the spatial elements of health inequalities.
- 3.37 There was general support for the deletion of the 'air quality neutral' glossary definition whilst noting the importance of air pollution in London.
- 3.38 Several respondents wanted the alterations to include a specific definition for 'sustainable development', including one that highlights the five sustainability objectives including environment and social elements. There was also support for the strengthening of some environmental policies such as flooding, climate change biodiversity.

### *The Inspectors report*

- 3.39 With regards to the European Directive on SEA, the Inspector's Report (para 8) concludes  
'a Sustainability Appraisal (SA) of the REMA has been carried out as part of an Integrated Impact Assessment (IIA) and is adequate. The IIA also includes an equalities impact assessment, which examines the impact of the Alterations on equalities groups, and health and community safety impacts. This is also satisfactory and meets the requirements of the GLA Act and the Equalities Act 2010.'
- 3.40 With regards to sustainable development, the Inspector's Report concludes:  
'The Mayor argued that the concept of achieving sustainable development underpinned both the LP and the REMA and I found no evidence to seriously question this position.'
- 3.41 With regards to affordable housing, the Inspector's Report concludes:  
'The revised definition is factually accurate and follows closely the wording of the NPPF, particularly concerning eligibility, which is to be determined with regard to local incomes and local house prices. Although it is not justified by any new evidence, the revision to policy 3.10 is a pragmatic approach in the circumstances.'

and

‘The National Audit Office Report indicates that the mechanism which will ensure that such housing remains affordable to those in need would be by increases in housing benefit. The details of how this mechanism would work for occupiers, in particular those families who would be subject to an overall benefit cap, remain uncertain.’

3.42 With regards to balanced and sustainable communities, the Inspector’s Report does conclude:

‘evidence of rent and income levels indicates that there is a very real risk of significant change in the amount of family housing in inner London, which has the potential to undermine social cohesion and the development of mixed sustainable communities.’

and

‘Increased housing benefits may redress any shortfall of affordability, but the new regime is not fully in place and at present the implications of the overall benefit cap are unclear.’

3.43 The Inspector’s Report recommends that the proposed alterations do not prevent the boroughs from setting local rent levels through their planning powers, where this can be justified.

3.44 With regards to gypsies and travellers the Inspector’s Report noted that the representors did not object to the additional words of the REMA regarding site provision but wanted the Mayor to take a proactive role at a sub-regional level to meet identified needs. The report noted that the evidence required to support this approach go beyond the remit of the examination, which is limited to a consideration of the submitted alterations.

3.45 With regards to cycle standards, the Inspector’s Report concluded  
‘Based on the available survey evidence, I agree with the Mayor that the revised London standards present a reasonable compromise between the need to encourage more cycling through better parking provision and the impact on development viability.’

3.46 With regards to health inequalities, the Inspector’s Report concluded  
‘I consider the text of the REMA properly reflects the strategic responsibilities of the Mayor; other minor improvements which do not go to the soundness of the Plan would not require further consultation.’

#### **4. Influence of the IIA and consultation responses on the alterations**

4.1 One of the purposes of IIAs is to promote sustainable development through the better integration of economic, social and environmental considerations into the preparation, adoption and monitoring of plans. The work on the REMA<sup>6</sup> and the associated IIA has ensured that all relevant sustainability and equality considerations have been addressed in the development of policies, including through a Sustainability Appraisal that considered alternative policy options. Stakeholder engagement during the scoping workshop and Examination in Public have also ensured that this work has been carried out robustly.

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<sup>6</sup> Including EMA to the London Plan

- 4.2 An important aspect for this statement is to highlight the influence the IIA, (including the specific Equalities Impact Assessment) has had on the development of the REMA.
- 4.3 In this instance most of the minor alterations were factual, reflecting Government policy and funding priorities, the NPPF and changes to health service. Plus, the wider environmental, social and economic policies in the London Plan remain in place to mitigate any potential negative effects of the proposed policies if applied in isolation.

*Affordable housing*

- 4.4 The main policy change in this area is the introduction of the definition of Affordable Rent – which is a new affordable housing product introduced by the Government. As this is a national policy, the definition already exists through the NPPF. The Government stated that Affordable Rent is intended to meet needs of those eligible for social rent. Rents can be up to 80% of market rent. It should be noted that the Government's definition of 'affordable housing' changed between the consultation of EMA and REMA. The revised national definition, introduced through the NPPF, alters the definition so that eligibility for social housing is based on local incomes and local house prices. At a strategic level the policy is to be implemented by the Mayor through his housing investment role. Contracts between the Mayor and providers will ensure affordable housing is delivered across London.
- 4.5 Given the introduction of affordable rent through national policy and the focus of national funding for this product, in this instance the IIA to the EMA/REMA has had limited influence on informing the development of the policy. The IIA for EMA/REMA was developed in conjunction with that for the Mayor's draft Housing Strategy which sets the Mayor's ambitions for housing in London, including his approach to use of the affordable rented housing product. As recommended in the IIA the implications of introducing the affordable rent product through the IIA will be monitored.
- 4.6 To address some of the comments received on equalities during consultation a sentence was added to London Plan paragraph 3.58 to note the close link between allocation policies, tenancy strategies and homeless strategies to ensure the policy is delivered to support mixed and balanced communities. In addition the policy alterations prioritise the provision of affordable family housing.
- 4.7 Potential flexibility in the application of the policy has been implied by paragraph 3.68 but linking any flexibility to the Mayor's Housing Strategy to ensure the overall delivery of affordable housing is still maximised.
- 4.8 As outlined in the IIA, these alterations support the key IIA sustainability objectives of development and regeneration, managing continued population growth, improving and protecting health and wellbeing, equalities and delivering appropriate housing. As outlined in the Sustainability Appraisal there is no significant effect of these policies on the environment. In support of the preferred policies, under the regeneration and land use objective it was noted that wider London Plan policies support the predominant use of brownfield sites for redevelopment which is likely to support the efficient and sustainable use of land.
- 4.9 As recommended by the IIA, the Mayor will monitor the investment and delivery of housing and affordable housing as part of the Annual Monitoring Report and the Housing Strategy. The Government also monitors housing delivery.

- 4.10 It should also be noted that under section 41 of the GLA Act 1999, as amended the Mayor must have regard to the need to ensure that the alterations are consistent with national policies, European Union and other obligations of the United Kingdom, consistency with other statutory Mayoral strategies, the resources available for the implementation of the revised Strategy.
- 4.11 The Mayor has received a letter from the Secretary of State for Communities and Local Government confirming that ‘...the approach set out in your revisions is aligned to my Department’s objective of increasing the delivery of affordable housing. Imposing rent controls through local planning policies would hinder this objective, and risks letting Londoners down by limiting the supply of affordable housing, and reducing choice for tenants.’

*Housing for specific groups*

- 4.12 These policy alterations reflect specific changes in order for the London Plan to be consistent with national policy to address provision for service families and the identification of sites for gypsies and travellers.
- 4.13 As outlined in the IIA, for service personnel the specific need in London is unknown, therefore this group will be a specific consideration in the Strategic Housing Market Assessment (SHMA) to inform future policy alterations. This is noted in the supporting text to the policy. As the changes were factual and at this stage there is limited information on the specific needs of service families there were no specific recommendations arising from the IIA to influence this policy change.
- 4.14 For gypsies and travellers it is considered that the national policy, and the London Plan are sufficiently robust to ensure the needs for gypsies and travellers are addressed by the boroughs. The three aspects of sustainability – economic, social and environmental were identified as considerations when identifying sites for gypsies and travellers. Provision for gypsies and travellers will be monitored through the Mayor’s Annual Monitoring report and by the Government.
- 4.15 Consultation responses suggested the Mayor use his strategic role to ensure delivery of sites, however as noted in the supporting text the Mayor agrees that the boroughs are best placed to, and should work with gypsies and travellers to identify local needs and appropriate locations for sites.
- 4.16 These alterations support the key IIA sustainability objectives of improving and protecting health and wellbeing, equalities and delivering appropriate housing. The Sustainability Appraisal notes that the proposed approach for gypsies and travellers to identify sites to meet the needs of gypsies and travellers is likely to limit the pressure for unauthorised sites, which have tended to be on green belt sites which could have had detrimental impacts on biodiversity. There are wider policies in the London Plan to protect biodiversity so that any sites identified are unlikely to have significant effects on biodiversity.

*Hazardous installations*

- 4.17 This proposed alteration to support the Mayor in providing guidance on development in the vicinity of hazardous installations is relatively minor and proactive. It was concluded

in the IIA that overall the policy change would have positive sustainability effects. Therefore no recommendations were identified through IIA appraisal process and public consultation for improvements to this policy.

- 4.18 The policy is considered to support the key IIA sustainability objectives of development and regeneration, managing population growth, improving and protecting health and wellbeing, equalities and delivering appropriate housing. The Sustainability Appraisal identifies that due to wider London Plan policies the preferred approach is likely to make the best use of scarce land resources and re-use brownfield sites.

*Cycling parking standards*

- 4.19 The IIA recommended further improvements to the proposed cycling standards, including provision to meet the needs of disabled people. Comments were also received in support of increased cycle provision during the public consultation, however some respondents wanted a more flexible application of the proposed standards. At this stage, as also noted by the Inspector, there is no evidence to support further changes. New London Plan paragraph 6A.12 states that 'the Mayor is continuing to review these cycle parking standards to ensure they support delivery of the significant increases in cycling.' This will inform future alterations.
- 4.20 In response to the IIA recommendation that the alterations consider the provision for disabled cyclists, TfL has stated that further information relating to provision of cycle facilities for disabled people will be included within the revised version of the London Cycling Design Standards which are due for publication later this year. This document is still being developed.
- 4.21 The policy is considered to support the key IIA sustainability objectives of managing population growth, improving and protecting health and wellbeing, equalities, responding to climate change, increasing transport accessibility, promoting safety and security and improving air quality.

*Other alterations*

*Health*

- 4.22 The proposed alterations included factual changes to reflect the changes to the provision of health services in London. Whilst these are not policy changes, they note the Mayor's role along with the boroughs on the establishment of the London Health Improvement Board and its priorities for health improvement work. It notes the local health and wellbeing strategies and the spatial potential to improve health and reduce health inequalities through the designated opportunity and intensification areas. These alterations respond to some of the comments received during the public consultation.
- 4.23 During the Examination in Public process small alterations were recommended by GLA officers following comments received during the public consultation. These changes were to reflect the changes in health provision and to ensure the spatial implications were taken into account to enable the best use of resources.

*Sustainable development*

- 4.24 A reference to sustainable development was included in the London's economy and the climate change chapters to reflect that sustainable development encompasses a range of considerations. A few changes were also made to environmental sections to reflect the National Planning Policy Statement. Whilst further strengthening of some environmental policies were sought such as sustainable drainage and flooding were sought by respondents, the REMA was not a full review of the Plan and therefore at this stage no changes were made. These will be reviewed in future alterations or a full review of the London Plan.

**5. Monitoring**

- 5.1 The European Directive 2001/42/EC on SEA requires monitoring of the significant environmental effects of implementing the Plan. The monitoring of REMA will cover significant environmental effects as well as the wider sustainability effects as required in the sustainability appraisal process. This monitoring will be an integral aspect of a more comprehensive approach to the monitoring and implementation of the London Plan which will bring together monitoring the delivery of each plan policy through the publication of an Annual Monitoring Report and a regularly updated Implementation Report. The processes for monitoring are set out below.
- 5.2 Table 1 below sets out the relevant sustainability objectives and the proposed measures for monitoring the specific sustainability effects of implementing the REMA to the London Plan. Being an alteration to the London Plan the indicators are those set out in Chapter 8 of the London Plan. Only the indicators that would be influenced by these alterations have been identified as being relevant. There are wider indicators that would monitor the overall sustainability objectives for the overall policies in the London Plan. For further information see the most recent London Plan Annual Monitoring Report (AMR) which is available on the GLA website<sup>7</sup>.
- 5.3 It is important to note that delivery of REMA can also be monitored through the Mayor's other plans and strategies. These include indicators used in the monitoring of the Mayor's strategies and priorities that take forward aspects of the London Plan, which include: air quality, biodiversity, health inequalities, housing, rough sleepers and transport. In particular, the Mayor is developing his Housing Strategy and has a Transport Strategy.
- 5.4 In addition to the measures outlined in the table below, there are other actions undertaken to monitor the effectiveness of REMA to the London Plan policy on an annual basis. For example, the London Development Database collects information on planning applications in London and can provide a number of statistics regarding new development.
- 5.5 This range of monitoring and reporting will contribute to future evidence bases and the monitoring of sustainability in London. This is a well-established process.

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<sup>7</sup> <http://www.london.gov.uk/priorities/planning/research-reports/monitoring-london-plan>



**Table 1: The Indicators relevant to monitor the proposed alterations**

<b>Sustainability topic</b>	<b>Sustainability Objectives</b>	<b>KPI</b>
<b>1. Regeneration &amp; Land-Use</b>	To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.	<p><b>1</b> Maximise the proportion of development taking place on previously developed land. Maintain at least 96 per cent of new residential development to be on previously developed land.</p> <p><b>2</b> Optimise the density of residential development. Over 95 per cent of development to comply with the housing density location and the density matrix (Table 3.2).</p> <p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>5</b> An increased supply of affordable homes. Completion of 13,200 net additional affordable homes per year.</p> <p><b>24</b> Protecting and improving London's heritage and public realm. Reduction in the proportion of designated heritage assets at risk as a percentage of the total number of designated heritage assets in London.</p>
<b>2. Biodiversity</b>	To protect, enhance and promote the natural biodiversity of London.	<p><b>1</b> Maximise the proportion of development taking place on previously developed land. Maintain at least 96 per cent of new residential development to be on previously developed land.</p> <p><b>3</b> Minimise the loss of open space. No net loss of open space designated for protection in LDFs due to new development.</p> <p><b>18</b> Protection of biodiversity habitat. No net loss of designated Sites of Importance for Nature Conservation.</p>
<b>3. Health and Well-being</b>	To maximise the health and wellbeing of the population and reduce	<b>3</b> Minimise the loss of open space. No net loss of open space designated for protection in LDFs due to new

	<p>inequalities in health.</p>	<p>development.</p> <p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>5</b> An increased supply of affordable homes. Completion of 13,200 net additional affordable homes per year.</p> <p><b>6</b> Reducing Health Inequalities. Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</p> <p><b>7</b> Sustaining economic activity. Increase in the proportion of working age London residents in employment 2011–2031.</p> <p><b>11</b> Increased employment opportunities for those suffering from disadvantage in the employment market. Reduce the employment rate gap between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England &amp; Wales average.</p> <p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole.</p> <p><b>15</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p>
<p><b>4. Equalities</b></p>	<p>To ensure equitable outcomes for all communities, particularly those most at risk of experiencing discrimination, poverty and social exclusion. To also promote the cultural,</p>	<p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>5</b> An increased supply of affordable homes. Completion of 13,200 net additional affordable homes per year.</p>

	ethnic, faith and racial diversity of London in a way that brings Londoners together.	<p><b>6</b> Reducing Health Inequalities. Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</p> <p><b>11</b> Increased employment opportunities for those suffering from disadvantage in the employment market. Reduce the employment rate gap between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England &amp; Wales average.</p>
<b>5. Housing</b>	To ensure that all Londoners have access to good quality, well-located, affordable housing.	<p><b>2</b> Optimise the density of residential development. Over 95 per cent of development to comply with the housing density location and the density matrix (Table 3.2).</p> <p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>5</b> An increased supply of affordable homes. Completion of 13,200 net additional affordable homes per year.</p>
<b>6. Employment</b>	To offer everyone the opportunity for rewarding, well-located and satisfying employment	<p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>11</b> Increased employment opportunities for those suffering from disadvantage in the employment market. Reduce the employment rate gap between BAME groups and the white population and reduce the gap between lone parents on income support in London vs England &amp; Wales average.</p>
<b>7. Stable Economy</b>	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	<p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p>

	economy (including new green technologies) that minimise unsustainable resource use.	
<b>9. Climate change Mitigation and Energy</b>	To ensure London contributes to global climate change mitigation, achieves greater energy efficiency and reduces its reliance on fossil fuels.	<p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole.</p> <p><b>15</b> Achieve a reduced reliance on the private car and a sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p> <p><b>20</b> Reduce carbon dioxide emissions through new development. Annual average percentage carbon dioxide emissions savings for strategic developments proposals progressing towards zero carbon in residential development by 2016 and zero carbon in all development by 2019.</p>
<b>12. Accessibility and Mobility</b>	To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).	<p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole.</p> <p><b>15</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p>
<b>13. Built and Historic Environment</b>	To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.	<b>24</b> Protecting and improving London's heritage and public realm. Reduction in the proportion of designated heritage assets at risk as a percentage of the total number of designated heritage assets in London.

<p><b>14. Liveability and Place</b></p>	<p>To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p>	<p><b>2</b> Optimise the density of residential development. Over 95 per cent of development to comply with the housing density location and the density matrix (Table 3.2).</p> <p><b>3</b> Minimise the loss of open space. No net loss of open space designated for protection in LDFs due to new development.</p> <p><b>4</b> Increase the supply of new homes. Average completion of a minimum of 32,210 net additional homes per year.</p> <p><b>5</b> An increased supply of affordable homes. Completion of 13,200 net additional affordable homes per year.</p> <p><b>6</b> Reducing Health Inequalities. Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</p> <p><b>15</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p>
<p><b>15. Open space</b></p>	<p>To protect and enhance natural open space in London.</p>	<p><b>1</b> Maximise the proportion of development taking place on previously developed land. Maintain at least 96 per cent of new residential development to be on previously developed land</p> <p><b>2</b> Optimise the density of residential development. Over 95 per cent of development to comply with the housing density location and the density matrix (Table 3.2).</p> <p><b>3</b> Minimise the loss of open space. No net loss of open space designated for protection in LDFs due to new development.</p> <p><b>18</b> Protection of biodiversity habitat.</p>

		No net loss of designated Sites of Importance for Nature Conservation.
<b>16. Air quality</b>	To improve London's air quality.	<p><b>6 Reducing Health Inequalities</b> Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</p> <p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole.</p> <p><b>15</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p>

## 6. Conclusion

- 6.1 The REMA to the London Plan seek to support the sustainable development of London. The REMA policies have been assessed by the IIA process to be a sustainable response to some of the pressures facing London, whilst making the best use of available resources. The IIA Report concludes that:  
 'Overall, the assessment found the alterations were likely to be broadly positive when considered against the IIA objectives.'
- 6.2 It will be critical to ensure significant negative effects do not arise during the implementation of the policies. This can be achieved by implementing the London Plan as a whole. The ongoing annual monitoring through the AMR, the Mayor's Housing Strategy and wider Government statistics as well as the use of the measures outlined above will serve as a way of reviewing the impacts and effectiveness of policies over time and of the plan as a whole. This will be reinforced by regular Implementation Reports, which will set out the progress in delivering REMA.

## Appendix 1 – Environmental considerations in the development of REMA

The European Directive 2001/42/EC1 on Strategic Environmental Assessment requires plans and programmes that are considered to have significant effects on the environment to be assessed for their environmental impact. The SEA Directive has been transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004.

This Sustainability Statement or post-adoption statement is prepared in accordance with s16 of the Environmental Assessment of Plans and Programmes Regulations 2004. This Appendix to the overall sustainability statement specifically addresses the requirements of s16(4) of the Regulations.

### (a) how environmental considerations have been integrated into the plan or programme;

Environmental considerations were considered through the development of the Integrated Impact Assessment for the REMA, which includes a Strategic Environmental Assessment, as part of the Sustainability Appraisal element of the IIA.

The Sustainability Appraisal assessed the potential impacts of the preferred policy options and alternative options on the Sustainability Objectives. The Sustainability Objectives specific to the environment included biodiversity, flood risk and climate change adaptation, climate change mitigation and energy, water quality and water resources, waste, air quality. Where the policies related to the sustainable use of land the objective relating to regeneration and land-use is also relevant.

Only significant policy alterations are required to be appraised through the IIA process. For the substantive policy alterations the following potential environmental effects were identified.

Policy area	Potential effect on the environment
Affordable housing	No significant effect, although due to wider London Plan policies the preferred approach is likely to make the best use of scarce land resources and re-use brownfield sites.
Hazardous installation	No significant effect, although due to wider London Plan policies the preferred approach is likely to make the best use of scarce land resources and re-use brownfield sites.
Cycling	Overall positive effect, especially with regards to climate change mitigation and energy and air quality.
Housing choice – service families	No significant effect.
Housing choice – gypsies and travellers	Overall positive effect, especially with regards to biodiversity.

See the full IIA Scoping Reports<sup>8</sup> for full details on the Key Sustainability Objectives and the Sustainability Appraisals.

Whilst not substantive policy changes to the London Plan, additional environmental considerations were incorporated into the wider alterations to ensure the overall Plan is

<sup>8</sup> <http://www.london.gov.uk/priorities/planning/london-plan/early-minor-alterations>

consistent with the National Planning Policy Framework and its underpinning principle of sustainable development. See paragraph 4.24 of this report for more details.

**(b) how the environmental report has been taken into account;**

As identified above, the only substantive policy alteration that was identified to have a potential direct effect on the environment was that relating to cycle parking standards. The IIA recommended further improvements to the proposed cycling standards, including provision to meet the needs of disabled people.

The Sustainability Appraisal identified that the two alternatives options to 'update all the cycle parking standards' and 'to have higher cycle parking standards' were appraised to have a likely overall positive effect on the environmental objectives of climate change mitigation and energy and air quality. These options were not chosen due to the lack of evidence to support them at this stage and therefore the policy change would be found 'unsound'.

Given the REMA are minor alterations, at this stage there was insufficient evidence to support further changes. However TfL are constantly monitoring cycling and developing an evidence base for cycle parking. To reflect this, new London Plan paragraph 6A.12 states that 'the Mayor is continuing to review these cycle parking standards to ensure they support delivery of the significant increases in cycling.' This will inform future alterations to the London Plan. For further details see paragraph 4.19-4.20 of this Sustainability Statement.

**(c) how opinions expressed in response to—**

**(i) the invitation referred to in regulation 13(2)(d);**

**(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;**

Section 3 of this statement summarises the relevant consultation responses in relation to the proposed alterations, the IIA and the Mayor's and the GLA's duties. Section 4 sets out how the consultation responses influenced the alterations.

With regards to the IIA, English Heritage requested more integration of historic assets in the scoping reports. It is considered that the built and historic environment was considered sufficiently in the Scoping Report through the background information, the sustainability objectives and clear links to the IIA for the full London Plan 2011. The other statutory consultees were satisfied with the Scoping Report and IIA.

Some respondents to the consultation requested further improvements and strengthening of the proposed cycling standards, however some respondents wanted a more flexible application of the standards.

Given the REMA are minor alterations, at this stage there was insufficient evidence to support further changes. However TfL are constantly monitoring cycling and developing an evidence base. To reflect this, new London Plan paragraph 6A.12 states that 'the Mayor is continuing to review these cycle parking standards to ensure they support delivery of the significant increases in cycling.' This will inform future alterations to the London Plan. For further details see paragraph 4.19-4.20 of this Sustainability Statement.



There was general support for the deletion of the 'air quality neutral' glossary definition whilst noting the importance of addressing air pollution in London.

Several respondents wanted the alterations to include a specific definition for 'sustainable development', including one that highlights the five sustainability objectives including environment and social elements. There was also support for the strengthening of some environmental policies such as flooding, climate change biodiversity.

Minor alterations to the text were included to reflect these comments and the NPPF, including a reference to sustainable development was included in the London's economy and the climate change chapters to reflect sustainable development encompasses a range of considerations. A few changes were also made to environmental paragraphs to reflect the National Planning Policy Statement. It is considered that the London Plan overall is a strategy for sustainable development. The REMA was not a full review of the Plan and therefore at this stage no further environmental changes were made. The wider environmental policies will be considered for review as part of the further alterations or a full review of the London Plan.

With regards to sustainable development, the Inspector's Report concluded  
'The Mayor argued that the concept of achieving sustainable development underpinned both the LP and the REMA and I found no evidence to seriously question this position.'

**(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;**

n/a

**(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;**

The Sustainability Appraisal appraised the preferred options and alternative options for the proposed policies. The chosen policies were those that were appraised to have a likely overall positive effect against the sustainability objectives. There were a few options appraised as having likely positive effects that could not be chosen as there was a lack of evidence to support them, or they were contrary to national policy and would not be 'sound' options.

The cycle parking standards were the only policy alteration identified to have direct likely effects on the environmental sustainability objectives. Two options 'not to update standards' and 'to have lower standards' were appraised to have an overall negative effect on climate change mitigation and energy and air quality objectives and therefore were not chosen. The options to 'update all the cycle parking standards' and 'to have higher cycle parking standards' were appraised to have an overall positive effect on the same environmental objectives. However, these were not chosen due to the lack of evidence to support them at this stage and therefore the likelihood that the policy change would be found 'unsound'. The original preferred option of updating some of the standards was also appraised as having an overall positive effect on the two relevant environmental objectives and therefore was carried forward.

**(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.**

Following are the relevant monitoring indicators to monitor the potential environmental impacts of the REMA. See Section 5 of this Sustainability Statement to see all of the relevant indicators to the REMA.

**The Indicators relevant to monitor the environmental effects of the proposed alterations**

<b>Sustainability topic</b>	<b>Sustainability Objectives</b>	<b>KPI</b>
<b>2. Biodiversity</b>	To protect, enhance and promote the natural biodiversity of London.	<p><b>1</b> Maximise the proportion of development taking place on previously developed land. Maintain at least 96 per cent of new residential development to be on previously developed land.</p> <p><b>3</b> Minimise the loss of open space. No net loss of open space designated for protection in LDFs due to new development.</p> <p><b>18</b> Protection of biodiversity habitat. No net loss of designated Sites of Importance for Nature Conservation.</p>
<b>9. Climate change Mitigation and Energy</b>	To ensure London contributes to global climate change mitigation, achieves greater energy efficiency and reduces its reliance on fossil fuels.	<p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole</p> <p><b>15</b> Achieve a reduced reliance on the private car and a sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p> <p><b>20</b> Reduce carbon dioxide emissions through new development. Annual average percentage carbon dioxide emissions savings for strategic developments proposals progressing towards zero carbon in residential development by 2016 and zero carbon in all development by 2019.</p>

<p><b>16. Air quality</b></p>	<p>To improve London's air quality.</p>	<p><b>6</b> Reducing Health Inequalities. Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women).</p> <p><b>14</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Zero car traffic growth for London as a whole.</p> <p><b>15</b> Achieve a reduced reliance on the private car and a more sustainable modal split for journeys. Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026.</p>
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## Appendix 2 – Equalities considerations in the development of REMA

The Mayor and GLA have “general public sector duties” under equality and wider legislation. As set out in paragraph 3.16 of this Sustainability Statement, the IIA process included an Equalities Impact Assessment of the REMA to the London Plan.

The public sector equality duty under Equality Act 2000 covers age, being or becoming a transsexual person, being married or in a civil partnership, being pregnant or having a child, disability, race including colour, nationality, ethnic or national origin, religion, belief or lack of religion/belief, sex, sexual orientation. These are the grounds upon which discrimination is unlawful and are referred to as ‘protected characteristics.’ The Duty requires the Mayor when exercising his functions to have ‘due regard’ to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equalities Impact Assessment was carried out as part of the wider IIA (see paragraph 3.16 of this Sustainability Statement) of the REMA. *Equalities* was one of the key sustainability objectives that all the proposed alterations and their alternative options were appraised against. *Health and well-being* and *access and mobility* are key sustainability objectives linked to equalities. The appraisal of the proposed policies against these objectives was integrated into the outputs of the full IIA report. The specific outputs of the Equalities Impact Assessment for the early minor alterations (EMA) to the London Plan were also published as a separate report to the overall IIA report.

The separate Equalities Impact Assessment for EMA sets out the evidence available for each alteration. For REMA additional evidence was contained in its Scoping Report. The Scoping Reports identified that for housing there was very little data based on people’s sexual orientation or gender reassignment. This was the same for cycling, where in addition, there was also little information based on religious belief and pregnancy or parenthood.

Below are the summarised findings of the specific Equalities Impact Assessment:

### *Affordable housing*

‘The early alterations to Affordable Housing Policy should provide increased certainty regarding Affordable Rent housing in London, which should support the sustained delivery of new affordable housing. The alterations are likely to contribute positively to provision of family housing and for creating mixed, sustainable communities, with likely positive benefits for relations between different groups. However, significant uncertainty regarding the national introduction of Affordable Rent and the complex relationship with welfare reforms is likely to affect the extent to which the benefits for groups of people sharing protected characteristics will be realised.

It remains uncertain how people sharing protected characteristics will respond to the combination of changes facing Londoners as a result of: welfare reform; the national introduction of Affordable Rent; the early alterations to London Plan policies on Affordable Housing; and new housing strategies for England and for London. We consider that the Mayor’s proposals for ongoing monitoring and review of the impact of the revised London Housing Strategy are also relevant for monitoring the early alterations to the London Plan affordable housing policies.’

In this regard, the Equalities Impact Assessment recommended:

‘the Mayor works closely with the Department for Work and Pensions and the Department for Communities and Local Government to monitor and review the actual cumulative effects of these policy changes for Londoners, with an emphasis on identifying patterns that indicate groups of people sharing protected characteristics are differently affected.’

#### *Hazardous Installations*

The specific Equalities Impact Assessment found:

‘The alterations to the policy wording regarding hazardous installations are likely to have positive impacts for regeneration, which are likely to be particularly important in areas of existing deprivation, with the potential of contributing towards equality objectives.’

There were no equalities recommendations in relation to hazardous installations.

#### *Cycle parking standards*

The specific Equalities Impact Assessment found:

‘The alterations to the cycle parking standards may have a positive impact on equalities objectives, by promoting improved provision, which may support widened uptake of cycling.’

The Equalities Impact Assessment recommended:

‘Consider further strengthening of policy or advice to support the inclusion of cycle parking suited to the needs of disabled cyclists (see 4.5.6).’

In response to this recommendation, TfL has stated that further information relating to provision of cycle facilities for disabled people will be included within the revised version of the London Cycling Design Standards which are due for publication later this year. This document is still being developed.

### **Equalities objections to the EMA**

Following is a summary of the objection received on EMA in relation to equalities considerations:

- the housing element conflicts with the Mayor's expressed strategic intent in the London Plan to 'tackle the huge of deprivation and inequality among Londoners': (Chapter 1 - 1.Mayor's vision and objectives; Chapter 2, paragraph 2.1; Chapter 3, paragraph 3.1, Policy 3.1A).
- failing to address the needs of households who have incomes below the median level in London will increase inequalities and the polarisation of London's communities.
- there is a lack of evidence to support conclusions of EqIA with regards to Affordable Housing/Rent
- the Mayor should provide comprehensive evidence that demonstrates there will not be significant negative equalities impacts arising from the Alterations

- alternatively the Mayor should allow flexibility to boroughs who have evidence suggesting that Affordable Rent provision in their area might have negative equalities impacts, to tailor their policy approach to Affordable Rent in a way that mitigates against such impacts
- failure to address fully and mitigate against likely negative equalities impacts might result in challenges to the Mayor's Alterations and/or borough plans under the equalities legislation.
- proposed wording - 'Equalities implications of different tenures of affordable housing should also be considered. Registered providers should also be mindful of the above considerations when designing new schemes and in determining the rates of conversion of their existing social stock to AR, particularly in areas such as inner London where house prices and rent levels are very high and the differences between rent levels in social rented housing and AR housing would be very significant.'
- will affect gypsies and travellers facing rents they cannot afford already and we deal with increasing housing crisis, evictions and homelessness

### **Equalities objections to the REMA**

- in some boroughs it is likely that significant equalities implications might arise from the introduction of "unrestricted rent" Affordable Rented housing. The Mayor's EQIA has not explored these in detail. A study undertaken by Islington indicates that specific equalities groups are likely to be more affected by Affordable Rented housing than others – irrespective of what proportion of market rent is used.
- where boroughs can demonstrate that a particular type of affordable housing might have equalities implications on certain equalities groups locally, those boroughs should be able to tailor their local policies to reduce the likelihood of such potential implications occurring.
- the Mayor should play a strategic role in highlighting and tackling inequalities around housing and health within London and support equality groups
- the Mayor should ensure local plans address the needs of groups with protected characteristics, including through the use of targets
- the Mayor should improve collection of data around sexual orientation and gender identity to enable issues to be addressed at a local level
- proposals do little to address housing affordability and inequality
- IIA recommendations to monitor do not go far enough to address potential impacts
- agree with the EMA equality impact assessment (EIA) that it is uncertain how the cumulative impact of these changes will impact on people on low incomes, particularly disabled people and people with long term health conditions who need accessible and adaptable housing or wheelchair accessible housing.

As stated above, the Equalities Impact Assessment outlines that the proposed affordable housing policies should provide increased certainty regarding the delivery of Affordable Rent housing in London, which should support the sustained delivery of new affordable housing, in general. However, significant uncertainty regarding the national introduction of Affordable Rent and the complex relationship with welfare reforms is likely to affect the extent to which the benefits for groups of people sharing protected characteristics will be realised.

The amendments to the REMA as a result of the IIA and consultation responses are identified in paragraphs 4.6 – 4.7 of this statement.

It should be remembered that Affordable Rent is a national definition and housing product. The significant proportion of funding from the Government for affordable housing between 2013

and 2015 will be for affordable rent. The Government's Equalities Impact Assessment states that

'Although some households are not likely to realise the same degree of benefits as would have been the case had they been allocated a social rented property (e.g. in terms of the introduction of time-limited tenure and potential for higher rents) the policy will also bring substantial advantages to the same type of households by increasing supply – i.e. in the absence of this policy limited supply could have had the effect that they would not have received any form of social tenancy and would have remained in the private rented sector.'

'Any households potentially disadvantaged by the new policy are nevertheless expected to benefit from a social housing property with rents set (and maintained) at a minimum of 20 per cent below market rate. Households who are let properties on Affordable Rents who would otherwise have been housed in the private rented sector are likely to experience beneficial impacts such as a lower rent, reduced poverty trap and improved security of tenure.'

The Government's Equalities Impact Assessment notes the interaction with the wider changes to social benefits, and states that this will be assessed during the development of those policies.

The objections to Affordable Rent and how it is to be applied in London and therefore REMA and its Equalities Impact Assessment argue that even at 20% below the market rate, affordable rent housing will not be affordable to many households in London requiring affordable housing given the high market rates in London and that the Mayor has no evidence to demonstrate there will be no equalities impact.

Only providers with a contract with the Mayor can deliver the affordable rent product and the intention is that rents will be below the local housing allowance to ensure Affordable Rent homes are affordable to those who occupy them. Occupiers may be affected by Universal Credit but as outlined in the Equalities Impact Assessment, it is unclear how occupiers sharing protected characteristics will respond to this cap on overall benefits. In addition, the Universal Credit does not affect all households in need of affordable housing. It does not apply to the households where one person is in work for at least 16 hours a week or are in receipt of certain benefits<sup>9</sup>. The number of exemptions, especially that relating to the hours in work, make it particularly difficult to identify which household may or may not be able to afford an affordable rent property and therefore positively affected by the overall housing policies to delivery more housing and affordable housing, or negatively affected by the combined changes of the alterations relating to affordable rent and the welfare system.

For the Affordable Rent product, the rent is set (and therefore affordability secured) through the Mayor's housing investment rather than his planning role, ie through the London Housing Strategy and the Mayor's contracts with registered housing providers to deliver the programme. The Mayor's duty on equalities applies to this role as it does to his planning role, and a similar duty on equalities applies to boroughs with regard to their tenancy strategies and housing allocation policies, which must be in general conformity with the London Housing Strategy. Equalities has been a consideration in the development of the London Housing Strategy, which

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<sup>9</sup> Personal Independence Payments, Attendance Allowance, the support component of Employment and Support Allowance, Industrial Injuries Benefits, war disablement pensions and payments, Armed Forces Compensation Scheme), War Widows and War Widowers pension, a person normally receiving Disability Living Allowance, Attendance Allowance or a War Disablement Pension but are in hospital or a care home, a child or young person receives certain benefits, been in employment for at least 12 months.

sets out the Mayor's investment plans and his expectations with regard to local tenancy strategies and allocations policies.

Where required by policy, developers not providing affordable housing in conjunction with a registered provider that has a contract with the Mayor will still need to provide affordable housing in accordance with London Plan Policy 3.11, which includes a requirement for social rent housing and boroughs can use their own resources to provide affordable housing at lower rents.

The Mayor has considered the potential impacts of the REMA on groups with protected characteristics. For some groups it is acknowledged that there is a lack of existing data as there is no local collection of data for example on sexual orientation or gender reassignment. Overall, the proposed alterations are considered to result in an increased supply in affordable housing and especially family housing. Allocation to this housing is still controlled by the boroughs and therefore will meet local need in accordance with their allocations strategies which will have been subject to equalities assessment. The impacts of REMA will be monitored through Government data and the Housing Strategy.