

THE LONDON PLAN
SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON

**SUPPLEMENTARY
INTEGRATED IMPACT
ASSESSMENT REPORT**
INCLUDING THE SCOPING REPORT

**REVISED
EARLY MINOR ALTERATIONS**
CONSISTENCY WITH THE
NATIONAL PLANNING POLICY FRAMEWORK

This version of the document is the “sustainability appraisal” for the purposes of regulation 7 (2) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000

15 June 2012

Revised early minor alterations to the London Plan

Integrated Impact Assessment report

1. Introduction

1.1 Background

The London Plan

- 1.1.1 The Greater London Authority (GLA) Act 1999 (as amended) requires the Mayor to produce a Spatial Development Strategy (which is generally known as the London Plan) and to keep it under review. The latest London Plan was published on 22 July 2011. During the later stages in the process to adopt this Plan, the Government announced proposals to change the planning system and land use policies, including introducing the affordable rent product. It was not possible to include these changes within the Plan at that time.
- 1.1.2 Prior to publication a commitment was made by the Mayor to the Secretary of State that he would bring forward a rapid formal early minor alteration to the new London Plan to address implications of the Government's new policy direction on affordable housing. The Secretary of State accepted this approach and was content to see the new London Plan published on this understanding.
- 1.1.3 Proposed early minor alterations were developed and published for consultation, firstly with the Assembly and functional bodies (November to December 2011) and then, incorporating an additional early minor policy alteration, with the public (February to March 2012). The proposed early minor alterations to the London Plan addressed:
- the emerging National Planning Policy Framework
 - the definition of affordable rent
 - new cycle parking standards
 - development near hazardous installations
 - the glossary definition of air quality neutral
- 1.1.4 Since consultation on these proposed early minor alterations to the London Plan, the Government has published its National Planning Policy Framework (NPPF) and planning policy for traveller sites. As indicated in the proposed early minor alterations Overview and Context Chapter of the London Plan, the opportunity has now been taken to review all the London Plan policies in light of the published national planning policy documents. Proposed revisions to ensure consistency between the London Plan and the two national policy documents have now been developed and are known as 'revised early minor alterations' to the London Plan. The proposed revisions mainly comprise policy responses to changes in national legislation and policy and other developments since the publication of the Plan. They do not constitute a full review of the approach taken in all the London Plan policies. An initial scope (see Appendix 1 of the Supplementary scoping report) has identified that the only substantive changes proposed to London Plan policies relate to housing. Specifically, these are:
- making provision for housing for service families

- confirmation that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers
- a revised definition of affordable housing

Integrated Impact Assessment

- 1.1.5 The Mayor adopts an integrated approach to assessing the impacts of his strategies, which incorporates the following legal requirements:
- the impact of policies and plans on the environment (meeting the requirements of the Strategic Environmental Assessment as set out in the European Directive 2001/42/EC)
 - a Sustainability Appraisal (as required by the Town and Country Planning (London Spatial Development Strategy) Regulations 2000)
 - a Health Impact Assessment (related to the duty to reduce health inequalities as set out in the GLA Act 1999 as amended)
 - an Equalities Impact Assessment (meeting the duties under the GLA Act 1999, as amended and the Equality Act 2010)
 - a Community Safety Impact Assessment (meeting the duties set out in section 17 of the Crime and Disorder Act 1998 and in the Police and Justice Act 2006).
- 1.1.6 Carrying out an Integrated Impact Assessment (IIA) enables any synergies and cross-cutting impacts of the assessments to be identified. Further details on the legal and policy requirements and background to these assessments can be found in the scoping report and IIA for the early minor alterations to the London Plan.

Relationship with previous IIAs

- 1.1.7 This IIA report for the revised early minor alteration builds on:
- the Scoping report for the replacement London Plan 2011¹
 - the IIA report for the replacement London Plan 2011²
 - the IIA Supplementary report for Gypsies and Travellers and Aggregates³ relating to the policies contained in the London Plan 2011
 - the Scoping report for the Early Minor Alterations to the London Plan (Assembly and Functional bodies version)⁴
 - the IIA report for the Early Minor Alterations to the London Plan⁵, including the:
 - o Equalities Impact Assessment
 - o IIA non-technical summary
 - o Scoping report addendum

Habitats Regulation Assessment

- 1.1.8 As for the proposed early minor alterations to the London Plan, these proposed revised early alterations are limited in scope, and only concern policies that the

¹ <http://www.london.gov.uk/shaping-london/london-plan/docs/ia-scoping-report.rtf>

² <http://www.london.gov.uk/shaping-london/london-plan/docs/ia-2a-final-report-oct09.pdf>

³ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

⁴ <http://www.london.gov.uk/sites/default/files/early-minor-alteration-lp-scoping-report.pdf>

⁵ <http://www.london.gov.uk/publication/early-minor-alterations-london-plan>

original HRA concluded have no mechanisms for impact on any European sites, and therefore have been scoped out at this stage. At the initial scoping stage Natural England indicated that it is happy with this approach.

2. IIA Methodology

2.1.1 The methodology adopted for undertaking the IIA is based on a ‘whole plan’ approach. This means that the policy effect of the plan as a whole is appraised instead of the effect of the individual policies. In this instance all the proposed policy revisions relate to housing, which was also an element of the IIA and scoping report on the early minor alterations to the London Plan.

2.1.2 The policy topics are appraised against the key sustainability objectives. The key sustainability objectives were developed for the scoping of the London Plan and updated as part of the scoping of the early minor alteration to the London Plan. Table 1 provides a summary of the topics and key sustainability objectives relevant to the proposed revised early minor alterations to the London Plan and are used in this assessment. The table identifies the key sustainability objectives against which the revised early minor alterations to the London Plan should be appraised and a set of guide questions.

Table 1 Key Sustainability Objectives relevant to housing for the IIA

Sustainability topic	Sustainability Objectives	Guide Questions
1. Regeneration & Land-Use	To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.	<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?
2. Biodiversity	To protect, enhance and promote the natural biodiversity of London.	<ul style="list-style-type: none"> • Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)? • Will it improve the quality and extent of designated and non-designated sites? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Will it protect and enhance the region’s waterbodies to achieve a good ecological status? • Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment? • Will it bring nature closer to people, especially in the most urbanised parts of the city? • Will it promote respect and responsibility for the wise

		<p>management of biodiversity?</p> <ul style="list-style-type: none"> • Will it improve access to areas of biodiversity interest? • To enhance the ecological function and carrying capacity of the green space network?
3. Health and Well-being	To maximise the health and wellbeing of the population and reduce inequalities in health.	<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?
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.	<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 who do not have that characteristic, including tackling prejudice and promoting understanding? • 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
5. Housing	To ensure that all Londoners have access to good quality, well-located, affordable housing.	<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?

		<ul style="list-style-type: none"> • Will it promote the increased supply of housing?
6. Employment	To offer everyone the opportunity for rewarding, well-located and satisfying employment	<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?
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 technologies) that minimise unsustainable resource use.	<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? • Will it support other niche or emerging sectors of the economy? • Will it help maintain London as an internationally competitive city? • Will it support the infrastructure required by a growing and changing economy?
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.	<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?

- 2.1.3 To comply with SEA requirements the following questions will also be addressed:
- what will be the situation with the proposed revised early minor alterations to the London Plan?

- how can the effects of the proposed revisions be enhanced or mitigated?
- how can the impacts of the proposed revisions be monitored?

3. The revised early minor alterations to the London Plan

3.1 Introduction

3.1.1 The Greater London Authority (GLA) Act 1999 (as amended) requires the Mayor to produce a Spatial Development Strategy (which is generally known as the London Plan) and to keep it under review.

3.2 Why are these revisions needed?

3.2.1 The latest London Plan was published on 22 July 2011. During the later stages in the process to adopt this Plan, the Government announced proposals to change the planning system and land use policies. These included detailed changes to affordable housing policy, including the introduction of a new affordable rent product and their intention to consolidate national planning guidance into a single National Planning Policy Framework document. It was not possible to include these changes within the Plan at the time. As such, prior to publication a commitment was made by the Mayor to the Secretary of State that he would bring forward a rapid formal early minor alteration to the new London Plan to address implications of the Government's new policy direction on affordable rent.

3.2.2 Proposed early minor alterations were developed and published for consultation, firstly with the London Assembly and Greater London Authority functional bodies (November to December 2011) and then, incorporating an additional early minor policy alteration, with the public (February to March 2012). The proposed early minor alterations to the London Plan addressed:

- the emerging National Planning Policy Framework
- the definition of affordable rent
- new cycle parking standards
- development near hazardous installations
- the glossary definition of air quality neutral

3.2.3 Since the consultation of the proposed early minor alterations to the London Plan the Government published in March 2012 its National Planning Policy Framework (NPPF) and planning policy for traveller sites. As indicated in the proposed early minor alterations to the Overview and Context Chapter of the London Plan, the opportunity has now been taken to review the London Plan policies in light of the published national planning policy documents. Proposed revised early minor alterations to ensure consistency between the London Plan and the two national policy documents have been developed. The proposed revisions mainly comprise policy responses to changes in national legislation and policy and other developments since the publication of the Plan in July 2011. They do not constitute a full review of the approach taken in all the London Plan policies. An initial scope (see Appendix 1 of the Supplementary scoping report) has identified that the only substantive revisions to London Plan policies relate to housing. Specifically, these are:

- making provision for housing for service families
- confirmation that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers
- a revised definition of affordable housing

3.3 Relationship with other strategies

3.3.1 The proposed revised early minor alterations are the Mayor's response to changes in national legislation and policy. The main national documents and policies include the NPPF, the planning policy for traveller sites and the Affordable Homes programme framework. When reviewing some of the new national policy approaches it was noted that some of the national planning policy changes are included to facilitate wider Government priorities such as helping service families into housing, supporting needed gypsy and traveller provision in appropriate locations and providing flexibility in the affordable housing tenancy whilst ensuring the delivery of affordable housing with a new funding model.

Service families

3.3.2 With regards to helping service families into housing, including purchasing their own homes⁶, the Government's wider strategies and programmes include:

- the ability for local authorities to prioritise service personnel in housing allocation policies,
- prioritising service personnel for the FirstBuy scheme and all other Government-funded home ownership schemes eg shared ownership
- working to ensure personnel are not disadvantaged when applying for a mortgage
- funding for groups that work with the homeless
- supporting self-build housing
- accelerating the Government release of land for housing building
- supporting adapted housing for injured personnel, including through planning policies that support applications from disabled ex-service personnel for homes

3.3.3 Most of these measures are not within the direct remit of the planning system and involve a wide number of organisations. The Mayor has recently taken over the housing powers from the Homes and Communities Agency in London and may be able to facilitate the implementation of some of these measures in London. The proposed revised early minor alteration aims to ensure that planning for the housing needs of service families is pro-active.

Gypsies and travellers

3.3.4 The Government's traveller site planning policy is part of a wider package of measures that will work alongside the reform of the planning system. These measures include⁷:

- Traveller Pitch Funding from April 2011,

⁶ <http://www.communities.gov.uk/housing/about/armedforceshousing/prioritylchoschemes/>

⁷ Planning policy for traveller sites. Impact assessment. Communities and Local Government, 2012

- the inclusion of traveller sites in the New Homes Bonus scheme since April 2011,
- reforms to enforcement measures to tackle unauthorised sites (via the Localism Act),
- improved protection from eviction for local authority traveller sites, and
- training for local authority councillors on their leadership role in site provision.

The Government has stated that these measures are aimed at securing fair and effective provision of authorised sites for travellers.

3.3.5 In line with the Government's planning reforms, the existing approach to planning for gypsies and travellers in the London Plan recognises that boroughs are best placed to assess the needs of, and make provision for these groups. The proposed alterations to the supporting text will continue this approach and encourage boroughs to work with gypsies and travellers and other stakeholders to identify local needs for temporary and permanent sites, and develop fair and effective strategies to meet need through the identification of land for sites.

Affordable housing

- 3.3.6 As outlined in the IIA for the early minor alterations to the London Plan, the Government has published its approach to delivering affordable housing. This includes a new funding model, including the ability for registered providers to charge up to 80% of local market rents in some instances. This is in part to support registered providers that wish to raise additional borrowing capacity. From April 2012 responsibility for affordable housing investment in London devolved to the Mayor. The draft London Housing Strategy⁸ sets out how affordable housing will be delivered in London and how the Mayor will work with the boroughs.
- 3.3.7 The Government has stressed the importance of publicly owned land in contributing to delivery of additional affordable housing and encourages providers to work with public bodies to build out their land banks⁹. In doing this they should aim to minimise other forms of subsidy such as HCA funding or contributions from the conversion of social to Affordable Rent housing.
- 3.3.8 Along with the proposed early minor alterations, the Mayor issued for consultation a draft supplementary planning guidance on how these new arrangements should be taken into account in the planning process in London¹⁰.
- 3.3.9 The proposed revised early minor alterations to the London Plan are to ensure the definition of affordable housing in the London Plan is the same as the national definition for affordable housing as set out in the National Planning Policy Framework.

⁸ Mayor of London. A revised London housing strategy – initial proposals. Consultation with the London Assembly and GLA Group. GLA, 2011

⁹ Affordable Homes Programme Framework. Homes and Communities Agency, 2011

¹⁰ <http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance>

3.4 How the IIA has informed the revisions, and how these have been taken into account

3.4.1 This IIA report for the revised early minor alteration builds on the following reports, drawing on the evidence base for the London Plan:

- the Scoping report for the replacement London Plan 2011¹¹
- the IIA report for the replacement London Plan 2011¹²
- the IIA Supplementary report for Gypsies and Travellers and Aggregates¹³
- the Scoping report for the Early Minor Alterations to the London Plan (Assembly and Functional bodies version)¹⁴
- the IIA report for the Early Minor Alterations to the London Plan¹⁵, including the:
 - o Equalities Impact Assessment
 - o IIA non technical summary
 - o Scoping report addendum

3.4.2 The development of the revised early minor alterations to the London Plan has included the following:

- a review of the London Plan policies to assess consistency with the NPPF
- a review of the London Plan policies to assess consistency with the planning policy for traveller sites
- a review of the London Plan to take account of legislation that has received Royal Assent since July 2011
- the development of proposed policy options, including alternatives. This involved:
 - o a review of evidence from a range of sources, including the evidence base for the London Plan 2011, the early minor alterations to the London Plan, previous IIAs and Equalities Impact Assessments, national policy and other evidence which has informed specific policy areas;
 - o consideration of comments received on the scoping report for the early minor alterations to the London Plan;
 - o production of a Scoping Report for the revised early minor alterations to the London Plan.

3.5 Wider input into the IIA

3.5.1 The development of the early minor alterations and its IIA was informed by a workshop held on 18th November 2011 with stakeholders to obtain their opinion on the scope of the IIA. The minutes of the workshop are included in the Scoping report addendum for the early minor alterations to the London Plan. Suggestions relating to the IIA scoping report were included in that report. Those relating to housing have also been considered in the scoping report and this IIA report for the revised early minor alterations to the London Plan. This

¹¹ <http://www.london.gov.uk/shaping-london/london-plan/docs/iaa-scoping-report.rtf>

¹² <http://www.london.gov.uk/shaping-london/london-plan/docs/iaa-2a-final-report-oct09.pdf>

¹³ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

¹⁴ <http://www.london.gov.uk/sites/default/files/early-minor-alteration-lp-scoping-report.pdf>

¹⁵ <http://www.london.gov.uk/publication/early-minor-alterations-london-plan>

report also considers the 'critical friend' feedback from the consultants who prepared the initial IIA on the early minor alterations to the London Plan.

- 3.5.2 The early minor alterations to the London Plan had two rounds of consultation, firstly with the London Assembly and Greater London Authority functional bodies followed by a public consultation. Comments received during the consultation with the London Assembly and Greater London Authority functional bodies were addressed in the IIA for the Early Minor Alterations to the London Plan. Comments received during the public consultation on the IIA relate to:
- the limited impact of the policy areas upon the historic environment and the importance of considering the historic environment in its broadest sense,
 - factual changes regarding the HSE assessment processes and objection to some of the baseline information set out in the Capita Symonds report,
 - the proposed changes to housing policy conflict with the Mayor's duties to tackle deprivation and inequality among Londoners,
 - an argument regarding identifying likely equalities implications and what these could be, including different for tenures of affordable housing,
 - on the same subject, that as an alternative the Mayor should provide 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 such impacts
(this is strictly an argument regarding the substance of the proposed alterations rather than the IIA itself).
- 3.5.3 Most of these comments are not relevant to the changes covered by the revised early minor alterations. A full integrated appraisal of affordable rent, including an equalities assessment was carried out as a part of the early minor alterations to the London Plan. This includes the background to the introduction of affordable rent and baseline information, but acknowledges that there is uncertainty over the introduction of the Government's affordable rent product and the complex relationship with the welfare system. Monitoring will be required to review the actual cumulative effects of the proposed policy change, with an emphasis on identifying patterns that indicate groups of people sharing protected characteristics are differently affected. An element of this uncertainty is due to the potential choices occupiers could take to balance income and size and location of their accommodation.
- 3.5.4 There have been no changes to the Government's definition of affordable rent or the allocation of public resources for affordable housing since IIA for the early minor alterations to the London Plan. The changes made by the Government to the definition of affordable housing in the NPPF (and reflected in the proposed revised early minor alteration to Policy 3.10) do not give rise to any need to change the view taken in the IIA. The Mayor's priority remains to optimise housing delivery, including maximising the output of affordable housing. Therefore the evidence and integrated appraisal for affordable rent remains valid.

3.6 Consideration of alternatives

- 3.6.1 As part of the SA process options and alternatives to the proposed revised early minor alterations approach need to be identified during the development of the proposed revised policies, including alternative policies. The scoping report sets out the potential implications of not including the alternatives (see Section 3 of the supplementary scoping report - attached as an Annex 1) and a detailed assessment appraises the identified alternatives against the sustainability objectives (see Table 6 and section 6.3 of the supplementary scoping report - attached as Annex 1).
- 3.6.2 In considering potential options and alternatives to the approaches proposed, it is important to bear in mind these proposed revised early minor alterations are in response to published policy changes at national level. The introduction of the proposed revised early minor alterations to the London Plan are in response to the NPPF's requirement that plans are consistent with it and to ensure there is no mismatch between national and London policy approaches and to provide clarification of the London approach where there is possible ambiguity.
- 3.6.3 The options developed and reviewed are:
- *adopting the approach set out in national policy.* This was deemed to have a generally positive effect as it would prevent any ambiguity between the approach to these elements in London and national guidance. This would facilitate the delivery of housing for the disadvantaged groups specified. New housing can be designed in a way to suit those with a specific need. Development in turn can facilitate the delivery of infrastructure, specialist services for those being housed.
 - *not setting out the approach set out in national policy.* The approach is considered only to have minor negative effect as the policy would still exist at a national level but has the potential to stall development due to potential perceived ambiguity between London policy and national policy, enabling developers and boroughs to interpret policy in different ways.
 - *setting out a specific London policy approach.* This only applies to the affordable housing element. This could have a potentially overall negative impact due to the reduced resources to fund affordable housing. The Government has stated that most new affordable housing will be in the form of affordable rent and therefore this approach is likely to be contrary to the national approach and deliver fewer homes, especially affordable homes.

3.7 Consultation of this IIA

- 3.7.1 This IIA is being published for consultation alongside the proposed revised early minor alterations. The consultation period will run for a minimum of eight weeks from 6th June to 31st July 2012.

4 Appraisal of alterations

4.1 Introduction

4.1.1 In line with the approach to appraise the overall plan and not individual policies. This section appraises the proposed revised early minor alterations to the housing policies as a whole.

4.2 Summary of revised alterations with a substantive impact

- 4.2.1 The proposed policy alterations are:
- an additional clause to make provision for housing for service families
 - additional wording confirming that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers
 - revised wording to the definition of affordable housing
- 4.2.2 To support these proposed policy alterations, it is proposed to amend wording in the supporting text as follows:
- additional paragraph reinforcing the pressing need for housing in London
 - revised wording confirming that the Mayor supports the Government guidance on delivering sites for gypsies and travellers to need their needs
 - additional wording supporting the NPPF approach to address the need for service families and people wishing to build their own homes
 - additional wording that the needs of these additional groups in society will be considered through the London Strategic Housing Market Assessment
 - additional wording confirming that boroughs should use measures beyond planning to maximise the delivery of affordable housing
 - additional wording confirming that boroughs are to consider the funding available when considering affordable housing policies as well as negotiating the level of affordable housing in individual schemes
- 4.2.3 For a full list of proposed changes, refer to the matrix setting out the Mayor's response to the NPPF which accompanies the proposed revised early minor alterations to the London Plan.

5. Baseline summary

5.1 As part of impact assessment, it is important to understand the existing situation for the policy areas that could potentially be affected by the policy revision.

5.1.1 The previous IIAs and Scoping Reports listed in paragraph 1.1.7 provide a more detailed baseline that informed this appraisal. The IIA report for the early minor alterations to the London Plan provides a summary of some the headline figures to provide a context for important appraisal findings. This section only provides a summary of the baseline relevant to these proposed alterations.

5.2 Population and growth

5.2.1 Population growth is an important consideration for the London Plan and has a major influence on policy development. London accounts for 41 percent of natural population growth in England and Wales (2007 figures). Unless there is a reversal of current population growth trends related to natural growth and migration, London will have to plan for continued population growth to 2031 and beyond.

5.2.2 There are about 5,000 service personnel living in London¹⁶. There is no comprehensive information about the number of service families. Figure provided by the housing providers resettling serve personnel leaving the armed forces, show that 5.3% were resettled in Greater London¹⁷. There is an estimate of between 13,537¹⁸ and 30,000¹⁹ gypsies and travellers living in London in approximately 779 caravans²⁰.

5.3 Poverty and inequality

5.3.1 The level of poverty in London, particularly child poverty, is a major long-term cause of health inequalities across the city. Levels of poverty and deprivation correlate closely with levels of poor health. People's employment status and the nature of their work also have a direct bearing on their physical and mental health, and even on their life expectancy. Across London average life expectancies vary, reflecting different concentrations of deprivation between boroughs. Londoners' self-reported health is slightly better than the national average for England. However, there are significant health inequalities within London.

5.3.2 Accommodation issues for the gypsy and traveller communities can have a substantial effect on their quality of life²¹. The lack of suitable, secure accommodation underpins many of the inequalities experienced by the gypsy and traveller communities because it increases the lack of security over accommodation, can aggravate health conditions and can lead to activities that reinforce preconceptions, such as antisocial behaviour²². Gypsies and travellers have significantly poorer health and more self-reported symptoms of ill-health than other UK resident English speaking ethnic minorities and economically disadvantaged white UK residents²³. Service and ex-service personnel are known to have higher rates of homelessness and mental illness²⁴.

¹⁶ The Annual Population Survey. Office of National Statistics, 2011

¹⁷ Homelessness within Ex-Armed Forces personnel. Riverside echg. 2011

¹⁸ London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, Fordham Research 2008.

¹⁹ Gypsy and Traveller Accommodation in London A Strategic View. London Gypsy and Traveller Unit. 2009

²⁰ Gypsy and traveller caravan count – January 2011. Department of Communities and Local Government, 2011

²¹ IIA Supplementary report for Gypsies and Travellers and Aggregates, ENTEC, 2010

²² Inequalities Experienced by Gypsy and Traveller Communities: A Review, Equalities and Human Rights Commission, 2009

²³ IIA Supplementary report for Gypsies and Travellers and Aggregates, ENTEC, 2010

²⁴ Homelessness within Ex-Armed Forces personnel. Riverside echg. 2011

5.4 Housing demand and delivery

- 5.4.1 The London Plan identifies London's housing requirements in the capital as 34,900 per year. The GLA report *Housing: A growing city* shows that 24,300 homes were provided in London in 2009/10 through new development, conversions and changes of use.
- 5.4.2 There are at least four specialist groups providing housing for ex-service personnel. These providers supply over 600 units of various forms including family housing, single person units and units suitable for personnel with disabilities or that provide managed services. There are no accurate figures for ex-service personnel in other forms of housing.
- 5.4.3 Many gypsies and travellers have a "cultural aversion" to living in fixed 'bricks and mortar' housing²⁵. The feeling of enclosure, isolation and inequalities can cause great anxiety to members of the gypsy and traveller community and such issues are further compounded by other deeply interrelated factors beyond the supply of suitable accommodation. Due to uncertainties surrounding the population of gypsies and travellers within London, there is a range of calculated estimates for the number of additional pitches required. It is estimated²⁶ that between 2012 and 2017 a range of 96 to 149 residential pitches will be required, along with another 138 houses (assuming the upper estimate of pitches is met), and an additional 25 plots for travelling show people. However the London Gypsy and Traveller Unit states that between 2012 and 2017 an additional 197 pitches and 53 yards will be required due to number of gypsies and travellers who currently are situated in fixed housing but who would like to be considered for pitches.
- 5.4.4 The Government's gypsies and traveller count states that in 2000 there were 496 authorised council sites in London. This rose to a peak of 512 in 2001 before steadily decreasing to 473 by 2010, a decrease of approximately five per cent²⁷. However the accuracy of these figures is questionable due to poor reporting.

5.5 What would the situation be without the revised early minor alterations?

- 5.5.1 The approach of the proposed revised early minor alterations to the London Plan relating to housing has already been introduced at the national level through the NPPF and planning policy for traveller sites. These national documents already set the guidance for developing planning policy and determining planning decisions in London. Housing will still be delivered in London without the proposed revised early minor alterations but not introducing these revisions into the London Plan could result in boroughs or developers not giving them sufficient priority or claiming uncertainty between the approach in the London Plan 2011 and the national policy documents.
- 5.5.2 The ambiguity between the national and London approach may result in boroughs and developers wanting to negotiate over what the housing priorities

²⁵ IIA Supplementary report for Gypsies and Travellers and Aggregates, ENTEC, 2010.

²⁶ London Boroughs' Gypsy and Traveller Accommodation Needs Assessment. Fordham Research, 2008

²⁷ London Sites 1981 – 2010. Department Communities and Local Government, 2010

should be. This in turn could delay the approval of schemes, resulting in additional costs at application stage and less funding for wider benefits such as social and physical infrastructure.

Health

- 5.5.3 Not clarifying the requirement for boroughs to plan for the housing needs of the disadvantaged groups outlined in national policy in London could reduce the opportunities to provide specialised housing for these groups limiting the ability to address the specific health and well-being issues these groups tend to suffer from including overcrowding, depression, homelessness and alcoholism.

Equalities

- 5.5.4 Not clarifying the requirement for boroughs to plan for the housing needs of the disadvantaged groups outlined in national policy in London could mean that inequality issues are not addressed and reduced, especially for traveller and gypsies, service families and those on a low income who have a higher proportion of young and elderly members and is over represented by people with disabilities. This approach would not help alleviate some of the issues faced by people with or that share protected characteristics.

5.6 Assessment of the proposed revised early minor alterations.

- 5.6.1 This assessment considers the potential impacts of the identified substantive revised early minor alterations to the London Plan for the selected key sustainability objectives. The overall impacts are limited as the approach of the proposed revised early minor alterations to the London Plan relating to housing has already been introduced at the national level through the NPPF and planning policy for traveller sites. The proposed revised early minor alterations aim to ensure sufficient priority is given to the proposed approach and prevent the claim that there is ambiguity between the approach in the London Plan 2011 and the national policy documents.

Regeneration and land use

- 5.6.2 The proposed revisions identify the requirement to meet the housing needs of specific groups in the community and highlight their importance to the Government and the Mayor. This in turn ensures that sites for these groups in the community will be identified, such as through the London Strategic Housing Market Assessment (SHMA) or boroughs' Local Plans. This is also likely to mean that the most appropriate sites are identified for housing, potentially contributing to the regeneration of an area. The proposed revisions are likely to enable policies to consider the Government's wider programmes to assist the delivery of housing for specific groups in society. The proposed revisions will be implemented in conjunction with the existing London Plan policies, especially those relating to the delivery of housing, providing housing choice and mixed and balanced communities.
- 5.6.3 A clear approach to the delivery of housing is more likely to enable schemes to include an appropriate housing mix, facilitating mixed and balanced communities. The delivery of housing in general can support and stimulate regeneration.

Biodiversity

- 5.6.4 The element of the proposed revised early minor alterations that relates to this key sustainability objectives is that for gypsies and travellers. The revisions are likely to lead to the timely identification of needed sites for gypsy and traveller pitches. This is likely to reduce the pressure for unauthorised sites, which have tended to be on vacant land, open space or green belt, which potentially had negative effects on biodiversity.
- 5.6.5 Sites identified for any required additional gypsy and traveller pitches are unlikely to be on land high in biodiversity value as these are protected by other national, London and local policies.

Health and well-being

- 5.6.6 The proposed revisions are likely to increase and improve the provision of high quality accommodation for specific groups in society, especially those that are disadvantaged and suffer from poor health such as service personnel, gypsies and travellers and those on a low income. The resulting likely provision of appropriate and secure accommodation can help alleviate health conditions and well-being issues these groups tend to suffer from including overcrowding, depression, homelessness and alcoholism. Assessing the housing needs of these groups can also help address overcrowding and poor standards of housing and assist in enabling stable access to health and social services. The proposed approach set out by the revisions will work in conjunction existing London Plan policies, especially on health and well-being, mixed and balanced communities and housing choice which seek to meet the housing needs of other groups in the community with specific requirements.
- 5.6.7 As stated in the IIA for the early minor alterations to the London Plan the uncertainty over the affordable housing regime could contribute to poor health. However, the changes in the affordable housing regime are proposed by the Government and are not as a result of proposed revision to the London Plan. The Government's Impact Assessment on Affordable Rent²⁸ has acknowledged that the additional cost will be addressed through the benefits system. In London with the Government's proposed overall cap on household benefits, the impacts are uncertain. However, the revised London Housing Strategy sets out how the Mayor proposes to ensure a range of rents are provided.
- 5.6.8 Overall the proposed revised alterations are likely to have a positive impact on health and well-being due to the provision of additional specialist housing, however as stated in the IIA, uncertainty in the cost of new affordable housing and the relationship with the benefits system will result in some health impacts related to the uncertainty in housing costs and overall income.

Equality and diversity

- 5.6.9 The clear support for boroughs to consider the needs for specific groups in the community, including those with protected characteristics is more likely to result in the delivery of specialist housing, including for those on a low income,

²⁸ <http://www.communities.gov.uk/publications/housing/rentimpactassessment>

gypsies and travellers, ex-service personnel as well as their families, including children. This need can be used to justify increased provision of low-cost, family and wheelchair or other adapted housing, as required. As well as housing with specialist management to help service personnel with particular issues.

- 5.6.10 This approach will be supported by wider Government programmes such as prioritising service personnel for Government home buying schemes and access to low cost housing and funding work to deal with homelessness and adapting existing housing so it is suitable for people with disabilities, funding traveller pitches and making the New Homes Bonus scheme available for the delivery of traveller pitches.
- 5.6.11 As stated above the uncertainty over the affordable housing regime could exacerbate inequalities as families and disabled people tend to rely more heavily on low cost housing. However, the changes in the affordable housing regime are proposed by the Government and not as a result of proposed revision to the London Plan. The Government's Impact Assessment on Affordable Rent has acknowledged that the additional cost will be addressed through the benefits system. In London with the Government's proposed overall cap on household benefits, the impacts are uncertain, however, the revised London Housing Strategy sets out how the Mayor proposes to ensure a range of rents as well as housing types are provided. The proposed approach will be implemented in conjunction with London Plan policies on mixed and balanced communities and housing choice that also seeks to ensure family housing, accessible housing and homes built to lifetime homes standards are delivered.

Housing

- 5.6.12 The London Plan aims to ensure sufficient housing can be delivered in London. The proposed revisions are unlikely to alter this approach significantly but ensure that the housing needs of additional groups in society are identified, including through the London Strategic Housing Market Assessment (SHMA) and boroughs' Local Plans. The proposed revisions are likely to facilitate the most appropriate location of any specialised housing, for example near supporting facilities and infrastructure - such as rehabilitation centres for service personnel.
- 5.6.13 This approach is more likely to enable policies and planning decisions to consider wider Government programmes that assist the delivery of this particular type of housing or the infrastructure and to support the occupiers of the housing. Government programmes include the FirstBuy scheme, new Homes Bonus, Traveller Pitch funding.

Employment

- 5.6.14 The clarity that this approach provides is likely to prevent delays to planning approvals that negotiations over housing priorities and the cost of affordable housing could result in. The delivery of new housing is more likely to support and generate construction jobs and associated jobs in the related service (retail, finance and legal) sectors. Although these jobs may be temporary it can also support training opportunities and provide people with skills for further employment. The provision of appropriate housing for people with specific

needs could improve their living conditions and health, potentially improving their ability to enter the workforce.

Stable economy

- 5.6.15 The clarity that this approach provides is likely to prevent delays to planning approvals that negotiations over housing priorities and the cost of affordable housing could result in. The delivery of new housing is more likely to support jobs, a stable housing industry and sustainable housing costs. The provision of appropriate housing for people with specific needs could improve their living conditions and health, potentially improving their ability to enter the workforce and making a positive contribution to the economy.

Liveability and place

- 5.6.16 This proposed revised minor alteration is more likely to ensure that the housing needs of additional specific groups in the community are identified. This is likely to include any specialist existing or required social and physical infrastructure required by these groups. Provision of specialist accommodation, especially for gypsies and travellers is likely to limit the need for unauthorised sites and limit conflict between travellers and the wider community as well as ensure appropriate infrastructure is put in place to support the gypsy and traveller community.
- 5.6.17 The delivery of housing schemes overall will support and stimulate investment for social and physical infrastructure improvements promoting sustainable places to live. Additional housing providing housing choice in line with London Plan policies will promote the creation of mixed and balanced communities.

6 Key finding

- 6.1.1 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.
- 6.1.2 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.

7 Recommendations

- 7.1.1 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

8 Monitoring

8.1.1 It is a requirement of the SEA Directive to establish how the significant effects of implementing the London Plan and its revised early minor alterations will be monitored. A set of key performance indicators are identified in the London Plan to monitor its implementation. These KPIs are reported in the London Plan Annual Monitoring Report (AMR).

8.1.2 The following are considered relevant to monitoring the effects of the policies affected by the early minor alterations to the London Plan.

No.	Key Performance Indicator	Target
1	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
4	Increase the supply of new homes	Average completion of a minimum of 32,210 net additional homes per year
5	An increased supply of affordable homes	Completion of 13,200 net additional affordable homes per year
6	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)

8.1.3 As noted in IIA for the early minor alterations to the London Plan, it is considered that the equality impacts of the revised early minor alterations to the London Plan concerning affordable housing would be most effectively monitored using indicators for monitoring the equality impacts of the revised London Housing Strategy.

9 Next Steps

9.1.1 This IIA Report is issued for consultation alongside the proposed revised early minor alterations to the London Plan. The consultation period will run for a minimum of eight weeks from Wednesday 6th July to Tuesday 31st July 2012.

9.1.2 Following receipt of comments on the proposed revised early minor alterations and the IIA Report, an Examination in Public (EIP) will be carried out in Autumn 2012. Following the EIP, the independent panel conducting the EIP will make recommendations to the Mayor in late 2012. Following consideration of these recommendations, the Mayor will inform the Secretary of State that he intends to publish the revised early minor alterations to the London Plan, which is anticipated to be adopted in early 2013. During this process additional amendments may be made to the draft revisions and any significant changes will be subsequently reflected in a revised IIA Report to support the published final revised early minor alterations to the London Plan.

9.2 Consultation on this IIA

This IIA Report is being issued for public consultation alongside the proposed revised early minor alterations to the London Plan.

How to give your views

All responses on the proposed revised early minor alterations to the London Plan and/or the IIA Report must be received by the **end Tuesday 31st July 2012**.

They should be sent to:

Boris Johnson
[Revised Early Minor Alterations]
Greater London Authority
FREEPOST LON15799
London SE1 2BR

Or by email to:

mayor@london.gov.uk

with '**Revised Early Minor Alterations to the London Plan**' as the title.

Please note, if you send in a response by email it is not necessary for you also to send in a hard copy. If your response only covers the IIA Report please make this clear in the subject line of your response. All responses will be made available for public inspection.

Annex 1

to the

Supplementary Integrated Impact Assessment Report

LONDON PLAN

Supplementary Integrated Impact Assessment Scoping Report

Revised early minor alterations

The London Plan

(Spatial Development Strategy for Greater London)

May 2012

Revised early minor alterations to the London Plan

Integrated Impact Assessment - scoping report

1. Introduction

1.1 Background

The early minor alterations to the London Plan

1.1.1 In November 2011 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.

1.1.2 In January 2012 an IIA report was produced to accompany the proposed early minor alterations to the London Plan. The IIA report included an addendum to the scoping report that considered an additional proposed alteration. A separate Equalities Impact Assessment and a technical summary were also published for consultation. These reports set out the background to the elements that comprise IIA and the process for preparing an IIA, including:

- what comprises the IIA
- what are the legal requirements and procedures to prepare an IIA
- the methodology for preparing a scoping report and an IIA
- the overall objectives and spatial development options for the London Plan
- the sustainability objectives

The revised early minor alterations to the London Plan

1.1.3 Since the consultation of the proposed early minor alterations to the London Plan the Government published its National Planning Policy Framework (NPPF) and planning policy for traveller sites. The opportunity is now being taken to review the London Plan policies in light of the published national planning policy documents. The proposed revisions only comprise policy responses to changes in national legislation and policy and do not constitute a full review of the approach taken in all the London Plan policies. An initial assessment (see Appendix 1 of the Supplementary scoping report) has identified that the only substantive revisions to London Plan policies relate to housing. Specifically, these are:

- making provision for housing for service families
- confirmation that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers
- a revised definition of affordable housing
- confirmation that in order to maximise the delivery of affordable housing, funding arrangements are to be taken into account

Integrated Impact Assessment

1.1.4 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) guidance set 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. With regards to the proposed revised early

minor alterations to the London Plan, the proposed policy changes with a substantive change relate to housing. Housing was extensively scoped as part of the IIA for the proposed early minor alterations to the London Plan. This report is a second addendum to the initial IIA scoping report prepared in November 2011 and only incorporates relevant updates including:

- updated proposed policies
- updated baseline information
- updated policy options and alternatives

Habitats Regulation Assessment

- 1.1.5 As for the proposed early minor alterations to the London Plan, these proposed revised early alterations are limited in scope, and only concern policies that the original HRA concluded have no mechanisms for impact on any European sites, and therefore have been scoped out at this stage. At the initial scoping stage on the early minor alterations to the London Plan Natural England indicated that it is happy with this approach.

Relationship with previous IIAs

- 1.1.6 This IIA report for the revised early minor alteration builds on:
- the Scoping report for the replacement London Plan 2011¹
 - the IIA report for the replacement London Plan 2011²
 - the IIA Supplementary report for Gypsies and Travellers and Aggregates³
 - the Scoping report for the Early Minor Alterations to the London Plan (Assembly and Functional bodies version)⁴
 - the IIA report for the Early Minor Alterations to the London Plan⁵, including the:
 - o Equalities Impact Assessment
 - o IIA technical summary
 - o Scoping report addendum

2. Policy alterations

2.1 The proposed additional policy alterations

- 2.1.1 An initial screening of the revised early minor alteration to the London Plan was carried out and is attached as Appendix 1. The proposed revisions considered to constitute a substantive change and therefore require an IIA are addressed in this scoping report.
- 2.1.2 The three substantive additional policy alterations that form part of the proposed revised early minor alterations to the London Plan all relate to housing. The proposed alterations are:
- making provision for housing for service families
 - confirmation that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers
 - a revised definition of affordable housing

The proposed revised early minor alterations are in response to the publication of the Government's National Planning Policy Framework (NPPF) or its planning policy for traveller's sites, both published in March 2012.

¹ <http://www.london.gov.uk/shaping-london/london-plan/docs/ia-scoping-report.rtf>

² <http://www.london.gov.uk/shaping-london/london-plan/docs/ia-2a-final-report-oct09.pdf>

³ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

⁴ <http://www.london.gov.uk/sites/default/files/early-minor-alteration-lp-scoping-report.pdf>

⁵ <http://www.london.gov.uk/publication/early-minor-alterations-london-plan>

2.2 Housing provision for service families

- 2.2.1 The NPPF introduces service families as a group in the community that local planning authorities should plan for as part of their housing mix. It is proposed to include an additional clause to London Plan Policy 3.8 – Housing Choice to ensure that in their Local Plans, boroughs make the appropriate provision for the accommodation of service families, having regard to local need. The proposed revision will be supported by additional text which outlines that the needs of service families will be assessed as part of the next London Strategic Housing Market Assessment.

2.3 Gypsy and traveller sites

- 2.3.1 The Government has published policy on planning for traveller sites. In line with this new policy document it is proposed to amend the London Plan to confirm that sites are to be identified as part of borough's approach to accommodating the needs for gypsies and travellers. It is also proposed to amend the supporting text to include some of the procedural elements that the national guidance requires boroughs to consider when developing their local targets and identifying sites for gypsies and travellers.

2.4 Affordable Housing

- 2.4.1. The proposed early minor alterations to the London Plan introduced the definition of affordable rent, which was originally published by the Government in June 2011 through revisions to Annex B of Planning Policy Statement 3: Housing.

- 2.4.2 Through the publication of the NPPF the Government has now also altered the definition of affordable housing so that it refers solely to eligibility for affordable housing being based on local incomes and local house prices. The new definition of affordable housing as set out in the NPPF is:

'Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.’

- 2.4.3 The proposed revised early minor alterations to the London Plan include the Government’s revised definition of affordable housing which includes eligibility based criteria for affordable housing, and that this should be based on local incomes and house prices.
- 2.4.4 The second proposed alteration relating to affordable housing is in relation to maximising delivery of affordable housing and ensuring that local targets and delivery take account of the new funding regime. This alteration supports the introduction of the revised definition of affordable housing, which is to be appraised and the introduction of affordable rent and its inclusion in the housing targets which were appraised as part of the proposed early minor alterations to the London Plan. It is considered that this proposed alteration has been fully scoped and appraised as part of the proposed introduction of the definition of affordable rent and the affordable housing targets which formed the early minor alterations to the London Plan.

3. Plans, programmes and strategies

In line with SA guidance this section identifies any additional plan, programmes and strategies that relate to the proposed revised early minor alterations. This section also sets out any potential implications of not introducing the proposed alterations.

3.1 Additional plans, programmes and strategies

- 3.1.1 The scoping report for the proposed early minor alterations to the London Plan sets out most of the relevant background to the Government’s changes to affordable housing. Many of the new plans, programmes and strategies relating to housing and affordable housing are listed in that scoping report. The limited new plans, programmes and strategies that are relevant to the revised early minor alterations to the London Plan are listed in the following table. These are in addition to those considered during the preparation of the Scoping and IIA reports identified in paragraph 1.1.6 above.

Table 1 Additional relevant plans, programmes and strategies

Plan, Programme or Strategy
General
Localism Act 2011
National Planning Policy Framework. Department for Communities and Local Government, 2012
Summary
The Government has introduced legislation and guidance to enable further decisions and management to be made locally on a broad range of issues and for the planning system to support sustainable development. The Localism Act 2011 among other things introduces a ‘general power of competence’ which gives local authorities the legal capacity to do anything that an individual can do that is not specifically prohibited. It also introduces flexible tenancies in affordable housing, including affordable rent. The Act enables local communities to own and manage community facilities, build housing and to initiate local referendum. In planning terms it also introduces a ‘duty to cooperate’. This is in order to

ensure cross boundary thinking and planning and to facilitate the delivery of large scale infrastructure. The NPPF provides guidance on most land uses and replaces previous national Planning Policy Statements and Planning Policy Guidance and some Government Circulars. A significant circular repealed is Circular 1/2008 – Strategic Planning in London, which set out the need for Sustainability Appraisal for the London Plan and its alterations. Section 1 of the IIA scoping report for the early minor alterations to the London Plan sets out the background to EU and national requirements for SAs. This includes the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, which requires proposed London Plans, including alterations to be subject to and accompanied by a sustainability appraisal.

London's People
Service Personnel Housing Summit - 16 May 2011. Summary of key issues and action points. Department for Communities and Local Government, 2012
Housing Priority for service personnel - Measures. Department for Communities and Local Government, 2012
Planning policy for traveller sites. Department for Communities and Local Government, 2012
Planning policy for travellers: Equality Impact Assessment for. Department for Communities and Local Government, 2012
Planning policy for traveller sites: Summary of consultation responses. Department for Communities and Local Government, 2012
Planning policy for travellers: Impact Assessment for. Department for Communities and Local Government, 2012
Draft London Housing Strategy. Mayor of London, 2012
Communities and Local Government Committee - Eleventh Report. Financing of new housing supply. 2012

3.2 Overall link of proposed policy changes to wider plans, programmes and strategies

Service families

- 3.2.1 The Government has set out a list of priorities to help service personnel into housing, including purchasing their own homes.⁶ These measures include:
- the ability for local authorities to prioritise service personnel in housing allocation policies,
 - prioritising service personnel for the FirstBuy scheme and all other Government-funded home ownership schemes eg shared ownership
 - working to ensure personnel are not disadvantaged when applying for a mortgage
 - funding for groups that work with the homeless
 - supporting self-build housing
 - accelerating the Government release of land for housing building
 - including planning policies that support applications from disabled ex-service personnel for homes that suit their needs through NPPF,
 - supporting adaptation of housing for injured personnel

⁶ <http://www.communities.gov.uk/housing/about/armedforceshousing/prioritylchoschemes/>

3.2.2 Most of these measures are not directly within the remit of planning and involve a wide number of organisations. The Mayor has recently taken over the housing investment powers from the Homes and Communities Agency in London and may be able to facilitate the implementation of some of these measures in London. The proposed revised early minor alteration aims to ensure that planning for the housing needs of service families is pro-active.

Table 2 Potential implications of not introducing the clause to plan for service family housing

Theme	Potential implications of not introducing the clause to plan for service family housing
London's Places	Requirement would still be in NPPF, but lack of identification of need and any required sites could place increasing pressure on existing barracks and sites providing specialist housing for service personnel and their families.
London's People	Requirement would still be in NPPF, but lack of identification of need and any required sites could limit the ability to plan for an appropriate mix of housing for service personnel as well as any specialist housing that may be required. This could result in no additional housing priority being given to additional groups with or who share protected characteristics.
London's Economy	No effect
London's Response to Climate Change	No effect
London's Transport	No effect
London's Quality of Life	Requirement would still be in NPPF, but lack of identification of need and any required sites could limit the ability to provide specialist housing for service families limiting the need to address any particular health and well-being issues, the continued homelessness rate for service personnel and limiting the ability to achieve mixed and balanced communities.

Gypsies and travellers

3.2.3 The Government has introduced planning policy for travellers sites which replaced national planning policy and guidance for gypsies' and travellers' and travelling showpeople sites set out in former Government Circulars 01/2006 and 04/2007. The new planning policy forms part of the Government's planning reforms which enable local communities to plan for their own needs. The aims of this national policy include⁷:

- that local planning authorities make their own assessment of need for the purposes of planning and work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- to encourage local planning authorities to plan for sites over a reasonable timescale
- that plan-making and decision-taking should protect Green Belt from inappropriate development, as well as local amenity and local environment
- to promote more private traveller site provision
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies

⁷ Planning policy for traveller sites. Communities and Local Government, 2012

- to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- to reduce tensions between settled and traveller communities in plan-making and planning decisions
- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure

3.2.4 The Government's traveller site planning policy is part of a wider package of measures that will work alongside the reformed of the planning system. These measures include⁸:

- Traveller Pitch Funding from April 2011,
- the inclusion of traveller sites in the New Homes Bonus scheme since April 2011,
- reforms to enforcement measures to tackle unauthorised sites (via the Localism Act),
- improved protection from eviction for local authority traveller sites, and
- training for local authority councillors on their leadership role in site provision.

The Government has stated that these measures are aimed at securing fair and effective provision of authorised sites for travellers.

3.2.5 In line with the Government's planning reforms, the new approach to planning for gypsies and travellers in the London Plan recognises that boroughs are best placed to assess the needs of, and make provision for these groups. The proposed alterations to the supporting text will continue this approach and encourage boroughs to work with gypsies and travellers and other stakeholders to identify local needs for temporary and permanent sites, and develop fair and effective strategies to meet need through the identification of land for sites.

Table 3 Potential implications of not specifically stating that sites should be identified for gypsies and travellers provision

Theme	Potential implications of not specifically stating that sites should be identified for gypsies and travellers provision
London's Places	Approach will be outlined in national policy, but could lead to ambiguity about the consistency between London Plan approach and national approach which could lead to potential continued delay in identifying and allocating sites, increases the possibility for unauthorised sites.
London's People	Approach will be outlined in national policy, but could lead to ambiguity about the consistency between London Plan approach and national approach which could lead to potential continued delay in identifying and allocating sites, limiting the delivery of any required pitches/sites. This could result in no additional housing priority being given to additional groups with or who share protected characteristics.
London's Economy	Approach will be outlined in national policy, but could lead to ambiguity about the consistency between London Plan approach and national approach which could lead to potential continued delay in identifying and allocating sites, which would not alleviate any pressure to use unauthorised sites and the costs for evicting occupiers.
London's Response to Climate Change	No effect
London's Transport	No effect
London's Quality of Life	Approach will be outlined in national policy, but could lead to ambiguity about the consistency between London Plan approach and national

⁸ Planning policy for traveller sites. Impact assessment. Communities and Local Government, 2012

	approach which could lead to potential continued delay in identifying and allocating sites for gypsies and travellers who are a disadvantaged group in society. This could continue to limit this group's access to appropriate housing, education, health and other services.
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Affordable housing

- 3.2.7 When it published the NPPF, the Government included a revised definition of affordable housing, replacing the definition in the revoked Planning Policy Statement (PPS) 3 - Housing. The new definition only refers to eligibility for affordable housing being related to local incomes and local house prices.
- 3.2.8 In line with the Mayor's priority to maximise the delivery of affordable housing, it is proposed to amend two policies to ensure that borough's planning policies and planning decisions have regard to making the best use of available resources when considering the proportion and type of affordable housing. This is to support the Government's new definition of affordable housing, including affordable rent which was consulted on as part of the early minor alterations to the London Plan.
- 3.2.9 The previous Scoping report and IIA for the proposed early minor alterations to the London Plan set out the funding changes for affordable housing and the Mayor's ongoing priority to maximise the delivery of affordable housing. The role of the planning system is to maximise delivery of appropriate affordable housing, without stifling development. As noted in the IIA for the proposed early minor alterations to the London Plan, it is considered that the benefits system will cover the element relating to the true cost of housing. This is identified in the Government's Impact Assessment for Affordable Rent⁹ which notes that the introduction of affordable rent is likely to lead to an increase in the national expenditure on housing benefit. However the IIA for the proposed early minor alterations to the London Plan noted that in London the impacts are uncertain due to the Benefits Caps which limit the household income from benefits to £26,000 including housing costs.
- 3.2.10 As stated above, it is considered the element regarding making best use of available resources has been scoped and appraised as part of the proposed introduction of the definition of affordable rent and does not need further appraisal through this IIA for the revised early minor alterations to the London Plan.

Table 4 Potential implications of not introducing the altered affordable housing policy

Theme	Potential implications of not introducing the affordable rent policy
London's Places	Whilst this would still be a national policy, the lack of clarity could detrimentally affect the delivery of schemes in London as boroughs and developers negotiate over the cost of affordable housing, limiting any benefits in areas in need of regeneration and the ability to achieve mixed and balanced communities.
London's People	Whilst this would still be a national policy, the lack of clarity could detrimentally affect the delivery of affordable housing as boroughs and developers negotiate over the cost of affordable housing. This could result in no additional housing priority being given to additional groups with or who share protected characteristics.
London's Economy	Whilst this would still be a national policy, the lack of clarity could delay approvals and therefore delivery of development.
London's Response to Climate Change	No effect

⁹ Draft National Planning Policy Framework Impact Assessment. Communities and Local Government, 2011

London's Transport	No effect
London's Quality of Life	Whilst this would still be a national policy, the lack of clarity could detrimentally affect delivery of schemes and affordable housing within schemes to the disadvantage of people in need of affordable housing, which are most likely to be those with low incomes or with a protected characteristic. Lack of access to affordable housing could in turn affect people's health and well-being.

4. Baseline information, key issues and indicators

4.1 Section 5 of the IIA scoping report for the proposed early minor alterations to the London Plan sets out that it is important to identify the current baseline data, including any trends and gaps in the data in relation to the policy areas proposed to be altered.

4.1.1 The next section is set as follows:

- baseline information
- potential gaps in the information
- key sustainability issues, including any trends

4.1.2 The London Plan was published in July 2011 and therefore it is too soon to fully appropriately monitor the impacts of the Plan's policies, and to establish whether alterations are required to mitigate any unforeseen negative impacts of the published policies.

4.2 Baseline information

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

4.3 London's places

Service families

4.3.1 No comprehensive geographic data is collated on the location, age and gender of service personnel and their families in London.

Possible gaps in the information and implications

4.3.2 Data is potentially required on:

- demographic data on service personnel and their families
- geographic distribution of barracks across London
- where service personnel and their families settle after serving in the armed forces
- the location of specialist services for service personnel and their families eg rehabilitation facilities

4.3.3 This information will help identify where and what type of additional housing is required and whether it is for serving personnel and their families or personnel that have left the armed forces. This information will help identify whether additional housing provision is required and where. For example is there a specialist rehabilitation centre where it would be beneficial to locate specialist adapted housing.

4.3.4 *Potential issues for consideration in the IIA*

- development and regeneration
- health and well-being
- equalities
- liveability and place

- 4.3.5 *Potential indicators*
- number and type of dwellings for service personnel by location

Gypsies and travellers

- 4.3.6 Section 3.1.1 of the IIA Supplementary report for Gypsies and Travellers and Aggregates¹⁰ identifies the significant baseline data in relation to gypsies and travellers. A review of London's 33 borough LDFs (approved and draft documents) showed that:

- 22 boroughs protect existing gypsy and traveller sites
- 11 boroughs state they have no existing sites or do not mention protecting existing sites
- 2 boroughs identify sites for additional provision
- 6 boroughs state that sites will be identified where a need is identified
- 3 boroughs state that sites will be found for the additional need that has been identified
- 1 borough identified that pitches on an existing site would be lost to improve the standard of the existing pitches

- 4.3.7 *Possible gaps in the information and implications*
- Improved data is required on the number of gypsies and travellers and the number of pitches. This data will help boroughs more accurately identify the need for gypsy and traveller sites in their area, and prioritise this need.

- 4.3.8 *Potential issues for consideration in the IIA*
- development and regeneration
 - liveability and place

- 4.3.9 *Potential indicators*
- number of gypsy and traveller sites and pitches by location

4.4 London's people

Service personnel in London

- 4.4.1 There is no comprehensive information as to how many service personnel live in London. The Annual Population Survey indicates that there are about 5000 service personnel living in London. There is no comprehensive information about the number of service families.
- 4.4.2 A study by Riverside¹¹ states that in 2009/10 seven per cent of entrants from recruitment centres to the UK Armed Forces were from London. The same report states that for the same period, from figures provided by the housing providers resettling serve personnel leaving the armed forces, 5.3% were resettled in Greater London. However, these statistics were provided by different organisation and therefore may not be based on the same data. In addition, this does not indicate whether there was more demand for re-settlement in London.

Housing for service personnel and their families living in London

- 4.4.3 Employed, service personnel and their families generally live in barracks provided by the Ministry of Defence. However there are no comprehensive figures on this. Once service personnel leave the armed forces they have the same housing choices as the general public, although in some boroughs they are given priority on the Council's housing

¹⁰ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

¹¹ Homelessness within Ex-Armed Forces personnel. Riverside echg. 2011

waiting list. In addition there are specialist providers of housing for service personnel. For example, Haig Homes is the UK's leading provider of rental housing for ex-Service people. Haig Homes has nine sites across London providing approximately 380 dwellings. The majority of these homes are suitable for families with only a small number of properties suitable for single occupancy. Some properties are suitable for the elderly and people with disabilities.

4.4.4 Also in London, the Stoll Foundation provides approximately 200 one, two and three-bedroom properties for rent, some with support housing management services. It also provides 36 units specifically designed for vulnerable and disabled ex-service personnel and 20 units specifically for former homeless veterans. VeteranAids has a hostel for ex-service personnel in east London. HOME BASE is a project operated by Community Housing and Therapy offering supported housing accommodation for single ex-service personnel looking for a home and a job in London.

4.4.5 Office for National Statistics data¹² shows that the number of defence force family dwellings in the UK has been steadily decreasing with 64,800 available in 2000 down to 49,100 in 2010. A review of planning permissions granted in London in the last 10 years revealed 13 permissions have been granted for schemes involving barracks. Of these six were for additional or replacement service personnel accommodation. The Ministry of Defence was the applicant for these whereas barrack sites developed for general purpose housing were in private ownership.

4.4.6 Serving and ex-service personnel find it difficult to obtain mortgages due to the transient nature of some posts. Some need specialist accommodation due to injuries. There is no clear data available for these issues.

4.4.7 *Possible gaps in the information and implications*

Data is potentially required on:

- the number of service families in London and their housing requirements
- the quality of existing family accommodation for service personnel
- the potential for additional housing on existing barracks
- the number and details of specialist accommodation needed

4.4.8 These could help ensure that appropriate type of housing is provided for service personnel and their families. For example specialist adapted accommodation or housing with an element of support or management.

4.4.9 *Potential issues for consideration in the IIA*

- development and regeneration
- health and well-being
- equalities
- liveability and place

4.4.10 *Potential indicators*

- London breakdown of defence force family dwellings
- approvals involving gain, loss or change in type of barracks
- ex-service personnel numbers within the homelessness count

Gypsies and travellers

4.4.11 Section 3.1.1 of the IIA Supplementary report for Gypsies and Travellers and Aggregates¹³ identifies the significant baseline data in relation to gypsies and travellers,

¹² Family accommodation and Defence land holdings. Ministry of Defence/Defence Force Holdings, 2011

¹³ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

including the gaps in the data. The latest gypsy and traveller caravan count in January 2011 notes 779 caravans in London¹⁴. This count also notes that at 13%, London had the lowest proportion of caravans on private sites.

4.4.12 *Possible gaps in the information and implications*

Data is potentially required on:

- accurate number of gypsies and travellers living in London
- the demographic make up of gypsies and travellers living in London

4.4.13 *Potential issues for consideration in the IIA*

- development and regeneration
- health and well-being
- equalities
- liveability and place

4.4.14 *Potential indicators*

- number of authorised and unauthorised gypsy and traveller sites in London

4.5 London's quality of life

Difficulties faced by service personnel

4.5.1 The Riverside report¹⁵ concludes that the exact figures for homeless ex-service personnel proves challenging to collate. It notes that Homeless Link (2011) suggests that nationally this proportion could be as high as 6% which based on Communities and Local Government figures equates to around 2,600 individuals in 2010. The Government states that the number of ex-service personnel who had become homeless since leaving the Armed Forces has fallen significantly since the 1990s. Its latest research suggests that 3-4 per cent of rough sleepers in London had been in the Armed Forces¹⁶. However, the Riverside report raises concern that the homelessness rate may increase as a result of reductions in resources.

4.5.2 The Riverside report notes that approximately two per cent of all service personnel were diagnosed with a mental disorder during 2010. Service personnel may be at higher risk of depression related to unemployment when leaving the Service. Ex-service personnel are also known to have a higher incidence of excessive drinking and there is a known close link between depression and alcoholism. There is limited information on service families.

4.5.3 *Possible gaps in the information and implications*

Data is potentially required on:

- the number of service families living in inappropriate accommodation
- the number and nature of health issues and disabilities

4.5.4 These could help ensure that the appropriate type of housing is provided for service personnel and their families and that housing is provided close to support services.

4.5.5 *Potential issues for consideration in the IIA*

- health and well-being
- equalities
- liveability and place

¹⁴ Gypsy and traveller caravan count – January 2011. Department of Communities and Local Government, 2011

¹⁵ Homelessness within Ex-Armed Forces personnel. Riverside echg. 2011

¹⁶ <http://www.communities.gov.uk/housing/about/armedforceshousing/prioritychoschemes/>

4.5.6 *Potential indicators*

- ex-service personnel numbers within the homelessness count

Gypsies and travellers

4.5.7 Section 3.1.1 of the IIA Supplementary report for Gypsies and Travellers and Aggregates¹⁷ identifies the significant baseline data in relation to gypsies and travellers.

4.5.8 *Possible gaps in the information and implications*

Data is potentially required on:

- the number of gypsy and traveller families wanting to move from fixed accommodation to sites/pitches
- the health issues of gypsies and travellers

Potential issues for consideration in the IIA

- health and well-being
- equalities
- liveability and place

Potential indicators

- number of authorised and unauthorised gypsy and traveller sites in London

5. Sustainability objectives

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.

5.1.2 All the proposed alterations relate to housing and in particular housing for disadvantaged groups. Therefore all the proposed changes share the same sustainability objectives. The relevant sustainability objectives are outlined below.

Table 5 Key Sustainability Objectives for the IIA

<i>Key Sustainability Objectives</i>	<i>Guide Questions</i>	<i>SEA Topic Requirement</i>
<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>2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.</p>	<ul style="list-style-type: none"> • Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)? 	<p>Biodiversity, Fauna, Flora, Soil, Water, Landscape</p>

¹⁷ <http://www.london.gov.uk/shaping-london/london-plan/docs/IIA%20Policy%20Alterations%202010.pdf>

<p>Relates to Issue *: B</p>	<ul style="list-style-type: none"> • Will it improve the quality and extent of designated and non-designated sites? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Will it protect and enhance the region’s waterbodies to achieve a good ecological status? • Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment? • Will it bring nature closer to people, especially in the most urbanised parts of the city? • Will it promote respect and responsibility for the wise management of biodiversity? • Will it improve access to areas of biodiversity interest? • To enhance the ecological function and carrying capacity of the green space network? 	
<p>3. Health and Well-being. To maximise the health and wellbeing of the population and reduce inequalities in health.</p> <p>Relates to Issue *: D</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> <p>Relates to Issue *: E</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 who do not have that characteristic, including tackling prejudice and promoting understanding? • 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>Population, Health</p>
<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? 	<p>Population, Health, Material Assets</p>

	<ul style="list-style-type: none"> • 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>6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p> <p><i>Relates to Issue*: C, G</i></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 technologies) that minimise unsustainable resource use.</p> <p><i>Relates to Issue*: H, G</i></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? • Will it support other niche or emerging sectors of the economy? • Will it help maintain London as an internationally competitive city? • Will it support the infrastructure required by a growing and changing economy? 	<p>Population, Material Assets</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><i>Relates to Issue*: H, N</i></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>

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 IIA scoping report and its addendum provided a commentary on the proposed alterations in relation to affordable housing.
- 6.1.2 In considering potential options and alternatives to the approaches proposed, it is important to bear in mind that these alterations are in response to the publication of the Government's national planning policy framework and the national planning guidance for traveller sites and therefore are already a material consideration in planning decisions.

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 6 Proposed policy preferred options and alternatives

Policy	Alternatives	Reasons
Policy 3.8 Housing choice	Preferred option	
	<p>B Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that.....</p> <p>j appropriate provision is made for the accommodation of service families, having regard to local need</p>	<ul style="list-style-type: none"> - the Government published the NPPF, which introduced service families as a group in the community planning authorities should plan housing for - even without its inclusion in the London Plan, this would be a requirement across London - the inclusion of service families in the London Plan will ensure that the housing needs of this group is considered in the London Strategic Housing Market Assessment (SHMA) - the inclusion of service families in the London Plan policy is likely to encourage London boroughs to consider this group in both planning applications as well as LDF policies. - this is likely to support the Government's other measures to support service families into housing eg Homebuy programme, local authorities housing register, mortgages - this will have positive social and economic impacts for service families in London.
	Alternative options	

	<p>Not introducing service families as a group in the community to consider as part of local authorities' housing policies</p>	<ul style="list-style-type: none"> - the consideration of service families has already been introduced at the national level in the NPPF and therefore would still apply for planning purposes - this could leave London's position ambiguous as its omission from the list of housing choice could be interpreted as this group in the community not being a priority. - this could result in the social problems such as homelessness in service personnel not being reduced and the provision of insufficient family accommodation for this group in the community
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Policy	Alternatives	Reasons
<p>Policy 3.8 Housing choice</p>	<p>Preferred option</p>	
	<p>B Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that.....</p> <p>i the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.</p>	<ul style="list-style-type: none"> - the Government published its planning policy for traveller sites which provides a range of objectives for addressing the housing needs of travellers - the inclusion of the national approach and deletion of the approach set out in the replacement London Plan 2011 provides clarity to the Boroughs and applicants for traveller sites and pitches - this is likely to facilitate identification and delivery of sites and pitches, removing the need for non-authorized pitches that can create social and environmental concerns - this is likely to have positive social and environmental impacts for service families in London.
	<p>Alternative options</p>	
<p>Not introducing the clarity that as a part of planning for gypsy and travellers, sites are to be identified.</p>	<ul style="list-style-type: none"> - there will still be national policy that local authorities would need to take into consideration. However, there may be confusion if there is a perceived difference between the London Plan policy the national policy - this approach could result in the delivery of less traveller sites or their unplanned delivery 	

Policy	Alternatives	Reasons
<p>Policy 3.10 Definition of affordable housing</p>	<p>Preferred option</p>	
	<p>A Affordable housing includes is social rented, affordable rented and intermediate housing (see para 3.61), provided to specified eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future</p>	<ul style="list-style-type: none"> - the Government introduced the definition of affordable housing through the NPPF for planning purposes, resulting in the need to translate this into planning policy for London - the affordable housing delivered is generally going to be in the form of affordable rent 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 in developing the 2011-15 London affordable housing programme and in proposals for a new London Housing Strategy. - this could mean that some rents may be 80%

	<p>eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p>	<p>of local market rents to enable funding of additional affordable housing. However the increased costs is likely to be covered by housing benefit, up to a point when the Universal Credit limit is reached</p> <ul style="list-style-type: none"> - this 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		
	<p>Not introducing the new definition of affordable housing into the London Plan</p>	<ul style="list-style-type: none"> - this definition of affordable housing has already been introduced at the national level in the NPPF and therefore would still apply for planning purposes - this could leave London's position with regards to the potential cost of housing 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 is not set at rents agreed by the Mayor and the registered providers, then 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.
	<p>Introducing a specific definition for London</p>	<ul style="list-style-type: none"> - this Government definition of affordable housing has already been introduced at the national level in the NPPF and therefore would still apply for planning purposes - this could leave London's position with regards to the potential cost of housing 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 - housing meeting another definition or set at alternative rents 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.

6.3 Sustainability appraisal

6.3.1 Below is the initial appraisal of the revised early alterations to the London Plan against the key sustainability objectives.

Policy 3.8 Housing choice		
General background and assessment	<p>The Government has identified particular housing needs for service personnel and their families, including specialist housing as well as access to funding to enable them to move into private housing. The overall strategic objective is to ensure the delivery of appropriate housing for service families in line with the National Planning Policy Framework and wider Government programmes. This is to be supported by wider Government programmes, including help with access to finance and supporting the provision of specialist accommodation to meet the specific needs of service personnel and their families.</p> <p>The proposed change, along with the supporting text, removes any uncertainty between the London Plan and the NPPF.</p>	
Sustainability Objectives	Preferred option	Alternative option
	Include a clause to ensure that the housing needs of service families are considered.	Not to include a clause to ensure that the housing needs of service families are considered.
1. Regeneration & Land-Use	<p>This clause highlights that meeting the housing needs of service personnel is important to the Government and the Mayor. This clause will ensure that the housing needs of service families are identified, including through the next London Strategic Housing Market Assessment (SMHA). This in turn encourages the potential of existing service personnel sites to be identified and can encourage the development of appropriate housing and wider improvements for service families. The policy reference is more likely to enable planning policies to consider the Government's wider programme to assist service families into housing.</p> <p>Overall positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF, but without its inclusion in the London Plan and the upcoming SHMA boroughs may not give this issue priority. This could limit any encouragement to improve existing service family sites.</p> <p>No significant effect</p>
2. Biodiversity	No significant effect	No significant effect
3. Health and Well-being	<p>This clause is likely to increase and improve the provision of appropriate high quality accommodation for service families, including appropriate size and facilities. This will especially provide health benefits for those in need of adapted housing and limit overcrowding.</p> <p>Overall positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF. However, without its inclusion in the London Plan and the upcoming SHMA boroughs may set other priorities for the delivery of housing which would not meet the need of service personnel, which would not help alleviate the health problems suffered by some service personnel and their families such as disability, depression and alcoholism.</p> <p>Overall negative effect</p>

<p>4. Equalities</p>	<p>This clause will ensure that the housing needs of service families are identified, including for children and family members that may have disabilities. The identified need can be used to justify increased provision of low cost, family and wheelchair housing, as required, which would be beneficial to groups with protected characteristics.</p> <p>Overall positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF. However without its inclusion in the London Plan and the upcoming SHMA boroughs may set other priorities for the delivery of housing which would not meet the need of service personnel, which would not help alleviate any equalities issues suffered by service personnel and their families such as disability and suitable accommodation for children.</p> <p>Overall negative effect</p>
<p>5. Housing</p>	<p>This clause will ensure that the housing needs of service families are identified, including through the next London Strategic Housing Market Assessment (SMHA). This clause is unlikely to deliver significantly more housing, but it is likely to ensure that appropriate housing is delivered for service families and could encourage more housing on existing service housing sites, where appropriate. The policy reference is more likely to enable policies to consider the Government's wider programme to assist service families into housing.</p> <p>Overall minor positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF. However without its inclusion in the London Plan and the upcoming SHMA boroughs may set other priorities for the delivery of housing.</p> <p>Overall minor negative effect</p>
<p>6. Employment</p>	<p>This clause will ensure that the housing needs of service families are identified. Where it leads to the provision of additional appropriate housing it can have beneficial effects for occupiers such as a stable home environment can support ex-service personnel into employment.</p> <p>Overall positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF. However, it may not be given priority resulting in less benefit for service personnel.</p> <p>Overall minor negative effect</p>
<p>7. Stable Economy</p>	<p>No significant effect</p>	<p>No significant effect</p>
<p>8. Flood risk and Climate Change Adaptation</p>	<p>No significant effect</p>	<p>No significant effect</p>
<p>9. Climate Change Mitigation and Energy</p>	<p>No significant effect</p>	<p>No significant effect</p>
<p>10. Water Quality & Water Resources</p>	<p>No significant effect</p>	<p>No significant effect</p>
<p>11. Waste</p>	<p>No significant effect</p>	<p>No significant effect</p>

12. Accessibility and Mobility	No significant effect	No significant effect
13. Built and Historic Environment	No significant effect	No significant effect
14. Liveability and Place	<p>This clause will ensure that the housing needs of service families are identified. This is likely to include any specialist existing or required social and physical infrastructure required by service families.</p> <p>Overall positive effect</p>	<p>Without this reference the Mayor and boroughs will still need to plan for the housing needs of service families as the policy is contained in the NPPF. However without its inclusion in the London Plan and the upcoming SHMA boroughs may set other priorities for the delivery of housing which would not meet the need of service personnel. This could place further pressure on existing sites housing service personnel.</p> <p>Overall minor negative effect</p>
15. Open Space	No significant effect	No significant effect
16. Air Quality	No significant effect	No significant effect

Policy 3.8 Housing choice		
General background and assessment	<p>The overall objective is to ensure that accommodation requirements for gypsies and travellers are identified and addressed through Local Plans. The Government has introduced planning policy for traveller's sites. Meeting any identified need for gypsies and travellers is best addressed at local level. A proportion of borough's LDFs identify existing and potential additional sites or need to accommodate gypsies and travellers.</p> <p>This reference emphasises, in line with national policy that sites are to be identified as part of addressing the provision for gypsies and travellers. This is more likely to ensure, where there is an identified need, sites will have to be identified in a reasonable time scale.</p> <p>This is to be supported by wider Government programmes, including providing funding to local authorities where additional pitches are provided.</p> <p>The proposed change, along with the supporting text, removes any uncertainty between the London Plan and the NPPF.</p>	
Sustainability Objectives	Preferred option	Alternative option
	Include a reference to site identification with regards to addressing the housing needs for gypsies and travellers.	Not to include a reference to site identification with regards to addressing the housing needs for gypsies and travellers.
1. Regeneration & Land-Use	The timely identification of needed sites is likely to limit the pressure for unauthorised sites and provide certainty over the potential location of traveller sites enabling appropriate infrastructure to be planned and provided.	Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text there may be perceived ambiguity between the national and London approach and ultimately sites may not be identified within a

	Overall positive effect	reasonable timescale. Overall negative effect
2. Biodiversity	The timely identification of needed sites is likely to limit the pressure for unauthorised sites, which have tended to be on the green belt and potentially had negative impact on biodiversity. Identified sites are unlikely to be high in biodiversity value given other policy protection for sites with high biodiversity value. Overall positive effect	Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text there may be perceived ambiguity between the national and London approach and ultimately sites will not be identified within a reasonable timescale. Overall negative effect
3. Health and Well-being	The timely identification of needed traveller sites is likely to facilitate the delivery of pitches/plots as required, which is likely to provide health benefits for the gypsy and traveller community, including from having secure accommodation and improved access to health and social services. Overall positive effect	Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text in the London Plan there may be perceived ambiguity between the national and London approach and ultimately sites may not be identified within a reasonable timescale limiting the ability of gypsies and travellers to find secure accommodation that meets their needs. Not having secure accommodation has a negative impact on health and well-being Overall negative effect
4. Equalities	The timely identification of needed traveller sites is likely to facilitate the delivery of pitches/plots, which will provide general benefits for the gypsy and traveller community, who are a disadvantaged group in the community and share a protected characteristic. Overall positive effect	Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text, there may be perceived ambiguity between the national and London approach and ultimately sites will not be identified within a reasonable timescale. Overall negative effect
5. Housing	The timely identification of needed traveller sites is likely to facilitate the delivery of pitches/plots for gypsies and travellers, helping boroughs meet any local targets. Overall positive effect	Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text in the London Plan, there may be perceived ambiguity between the national and London approach and ultimately sites may not be identified to meet any local targets and meet the needs of a group in the community within a reasonable timescale. Overall negative effect
6. Employment	No significant effect	No significant effect
7. Stable Economy	No significant effect	No significant effect
8. Flood risk and Climate Change Adaptation	No significant effect	No significant effect

9. Climate Change Mitigation and Energy	No significant effect	No significant effect
10. Water Quality & Water Resources	No significant effect	No significant effect
11. Waste	No significant effect	No significant effect
12. Accessibility and Mobility	No significant effect	No significant effect
13. Built and Historic Environment	No significant effect	No significant effect
14. Liveability and Place	<p>The timely identification of traveller sites is likely to facilitate the delivery of pitches/plots meeting the needs of a disadvantaged group in the community. The provision of appropriate housing for travellers is likely to limit the need for unauthorised sites and limit conflict between travellers and the wider community as well as ensure appropriate infrastructure is put in place to support the traveller community.</p> <p>Overall positive effect</p>	<p>Without this reference boroughs will still need to follow the requirements set out in national planning policy. However without removing the supporting text in the London Plan, there may be perceived ambiguity between the national and London approach and ultimately sites may not be identified within a reasonable timescale. This could result in the continued use of unauthorised sites leading to tensions in the community and poor living conditions due to insufficient infrastructure.</p> <p>Overall negative effect</p>
15. Open Space	No significant effect	No significant effect
16. Air Quality	No significant effect	No significant effect

Policy 3.10 A - Definition of affordable housing			
General background and assessment	<p>The Government introduced the definition of affordable housing into the National Planning Policy Framework, resulting in the need to translate this into planning policy for London</p> <p>The HCA's <i>Affordable Homes Programme Framework</i> sets out the Government's the new funding model for affordable housing. It states that:</p> <ul style="list-style-type: none"> - affordable rent is going to be the main affordable housing product delivered; - there is to be greater flexibility in affordable housing provision; and - eligible tenant will continue to receive housing benefit. <p>This approach has been taken forward by the Mayor and the Homes and Communities Agency in developing the 2011-15 London affordable housing programme and in the proposals for a new London Housing Strategy.</p> <p>The Mayor's strategic objective is to maximise delivery of affordable housing in London, enabling London to meet its housing target, also set out in the London Plan. This is also reflected in the Mayor's proposed new London Housing Strategy.</p>		
Sustainability	Preferred option	Alternative option	Alternative option

Objectives	Alter the definition of affordable housing	Not to amend the definition of affordable housing in the London Plan	Introducing a specific affordable housing definition for London
1. Regeneration & Land-Use	<p>This approach will provide clarity on London's position with regards to affordable housing. It will assist boroughs when preparing their affordable housing policies to ensure that the delivery of affordable housing is maximised. This is also likely to reduce negotiations over the costs of affordable housing enabling schemes to still deliver affordable housing (which is a requirement for major housing schemes) based on the HCA's/ Mayor's current and likely future funding and delivery arrangements. The delivery of housing schemes overall will support and stimulate regeneration, including investment for social and physical infrastructure. An increased population is likely to support local jobs.</p> <p>Overall positive effect</p>	<p>This could leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing and therefore delay regeneration schemes that would be required to provide affordable housing as an element of the overall scheme. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p>Overall negative effect</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing and therefore delay regeneration schemes that would be required to provide affordable housing as an element of the overall scheme. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p>Overall negative effect</p>
2. Biodiversity	No significant effect	No significant effect	No significant effect
3. Health and Well-being	<p>The clarity that this approach provides is likely to prevent delays to planning approvals whilst there are negotiations over the cost of affordable housing and enable new housing to be delivered across London. The provision of new high quality affordable accommodation is likely to provide health benefits for those currently in poor and inappropriate housing.</p> <p>Construction can have negative short term impacts on local air quality and noise levels. The London Plan contains policies to minimise negative impacts from these sources.</p> <p>Overall positive effect</p>	<p>This would leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes, including associated affordable homes and creation of jobs. This is likely to have a negative impact on the health and well-being of those in need of a home or a different type of home (eg a larger/smaller home or wheelchair housing) as well as those in need of work.</p> <p>Overall negative effect</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing, reducing the delivery of homes, including affordable homes and creation of jobs. This is likely to have a negative impact on the health and well-being of those in need of a home, a different type of home (eg a larger/smaller home or wheelchair housing) as well as employment levels.</p> <p>Overall negative effect</p>
4. Equalities	<p>The clarity that this approach provides is likely to prevent delays to planning approvals whilst there are negotiations over the cost of affordable housing and enable new housing to be delivered across London. New housing and affordable housing provided in line with London Plan policies is likely to promote housing choice, so this approach will support, for example families, children, the elderly, people with disabilities through the provision</p>	<p>This would leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. The delivery of less housing especially affordable homes would also result in the delivery of less family and wheelchair housing and</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. The delivery of less housing especially affordable homes would also result in the</p>

	<p>of family and wheelchair housing and lifetime homes. This is more likely to be beneficial to groups with protected characteristics.</p> <p>This approach enables the provision of affordable housing for people with low incomes, in accordance with new funding arrangements. The Mayor is negotiating that housing delivered under this approach can be afforded within the benefits system.</p> <p>Overall positive effect</p>	<p>lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, the elderly and people with disabilities.</p> <p>Overall negative effect</p>	<p>delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, the elderly and people with disabilities.</p> <p>Overall negative effect</p>
5. Housing	<p>The clarity that this approach provides is likely to prevent delays to planning approvals whilst there are negotiations over the cost of affordable housing and enable new housing to be delivered across London. In line with London Plan policies this will include affordable, family and wheelchair housing and lifetime homes.</p> <p>Overall positive effect</p>	<p>This would leave London's position ambiguous and could delay planning approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes, including affordable, family and wheelchair housing and lifetime homes. This could delay the delivery of the housing target set out in the London Plan.</p> <p>Overall negative effect</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes, , including affordable, family and wheelchair housing and lifetime homes. This could delay the delivery of the housing target set out in the London Plan.</p> <p>Overall negative effect</p>
6. Employment	<p>The clarity that this approach provides is likely to prevent delays to planning approvals whilst there are negotiations over the cost of affordable housing and enable new housing to be delivered across London. The delivery of new housing is more likely to support and generate construction jobs and associated jobs in the related service (retail, finance and legal) sectors. Although these jobs may be temporary it can also support training opportunities and provide people with skills for further employment.</p> <p>Overall positive effect</p>	<p>This would leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. This is likely to result in the generation of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities.</p> <p>Overall negative effect</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. This would result in the provision of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities</p> <p>Overall negative effect</p>
7. Stable Economy	<p>The clarity that this approach provides is likely to prevent delays to planning approvals whilst there are negotiations over the cost of affordable housing and enable new housing to be delivered across London. The delivery of new housing is more likely to support jobs, a stable housing industry and sustainable housing costs.</p>	<p>This would leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. The deliver of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing reducing the delivery of homes. The deliver of fewer homes in London is likely to result in the generation of fewer</p>

	Overall positive effect	<p>which can have a negative impact on the economy as housing costs become disproportionate to incomes.</p> <p>It would not ensure the efficient use of resources.</p> <p>Overall negative effect</p>	<p>jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become disproportionate to incomes.</p> <p>It would not ensure the efficient use of resources.</p> <p>Overall negative effect</p>
8. Flood risk and Climate Change Adaptation	No significant effect	No significant effect	No significant effect
9. Climate Change Mitigation and Energy	No significant effect	No significant effect	No significant effect
10. Water Quality & Water Resources	No significant effect	No significant effect	No significant effect
11. Waste	No significant effect	No significant effect	No significant effect
12. Accessibility and Mobility	No significant effect	No significant effect	No significant effect
13. Built and Historic Environment	No significant effect	No significant effect	No significant effect
14. Liveability and Place	<p>This approach will provide clarity on London's position with regards to affordable rent, which is likely to enable schemes to still deliver affordable housing (which is a requirement for major housing schemes) based on the HCA's/ Mayor's funding and delivery arrangements. The delivery of housing schemes overall will support and stimulate investment for social and physical infrastructure improvements promoting sustainable places to live. Additional housing providing housing choice in line with London Plan policies will promote the creation of mixed and balanced communities.</p> <p>Overall positive effect</p>	<p>This would leave London's position ambiguous and could delay approvals whilst there are negotiations over the cost of affordable housing, reducing the delivery of schemes that would increase housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p>Overall negative effect</p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals whilst there are negotiations over the cost of affordable housing, reducing the delivery of schemes that would increase housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p>Overall negative effect</p>
15. Open Space	No significant effect	No significant effect	No significant effect

16. Air Quality	No significant effect	No significant effect	No significant effect
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Appendix 1

Revised early minor alterations to the London Plan - Justification for which policies are a substantive change and require appraisal

Summary Table

Policy to be changed	Proposed change	Effect	Substantive change requiring IIA appraisal?
Overview and Introduction	<p>Minor changes to note the implications of the Localism Act 2011.</p> <p>Minor changes to reflect the revocation of Government circulars and national guidance and the publication of the NPPF.</p>	<p>Reflect updates in national legislation and national guidance. Provide factual information in relation to the new Act.</p> <p>No change to policy or overall effect of the Plan.</p> <p>Provide clarity on the status of the London Plan in relation to newly published national legislation and policy.</p> <p>Set out procedural issues resulting from new national legislation and policy.</p> <p>No change to policy or overall effect of the Plan.</p>	No
Chapter 1 - Context and Strategy	<p>Update supporting text to reflect publication of the NPPF and Royal Assent of the Localism Act.</p> <p>Include reference to neighbourhood plans.</p>	<p>Reflect updates in national legislation and national guidance. Provide factual information in relation to the new Act, including the new duty to cooperate.</p> <p>Set out procedural issues resulting from the new national legislation and policy.</p> <p>No change to policy or overall effect of the Plan.</p>	No
Chapter 2 - London's Places	<p>Minor change to references within policy reflecting the revocation of PPG and publication of the NPPF.</p> <p>Minor changes to the supporting text to reflect the introduction of the 'duty to cooperate' in the Localism Act.</p>	<p>Factual change which clarifies the London Plan policy approach in relation to the NPPF. No change to the overall effect of the policy or approach in the Plan.</p> <p>Factual changes which provide some clarification on the Mayor's approach to the 'duty to cooperate'.</p> <p>No change to the overall effect of the policy or approach in the Plan.</p>	No
Chapter 3 - London's People	<p>Change to policy and supporting text to ensure appropriate housing provision is made for service families.</p> <p>Minor policy change to confirm that sites are to be identified as part of borough's approach to accommodate the needs of gypsies and travellers, in line with national policy.</p>	<p>Requires the housing need for an additional group in the community is specifically taken into account when planning for housing.</p> <p>New specific approach to be introduced.</p> <p>Site identification should already be part of the overall approach by boroughs to meet the need for gypsies and travellers.</p> <p>Strengthens policy approach by making it explicit that sites are to be identified to accommodate the requirements of gypsies and travellers over a period of time.</p> <p>Alteration to an existing approach.</p>	<p>Yes</p> <p>Yes</p>

	<p>Policy change to reflect the Government's altered published definition of affordable housing, which sets out the eligibility criteria for affordable housing.</p> <p>Minor policy changes to clarify that targets for affordable housing in LDFs and the proportion negotiated as part of planning applications should have regard to the funding available to maximise delivery.</p> <p>Minor policy change to ensure the justification for not providing an affordable housing contribution on-site is 'robust'.</p> <p>Minor changes to references within policies reflecting the revocation of PPSs and publication of the NPPF.</p> <p>Minor changes to the supporting text to reflect the implications of the Health and Social Care Act 2011.</p> <p>Minor changes to references within the supporting text to reflect the revocation of PPSs and publication of the NPPF, including specific supporting text on gypsies and travellers, service families, people that want to build their own homes, affordable housing and support for educational facilities</p> <p>Minor changes providing justification for the existing policy approach to housing need and targets.</p>	<p>Provides policy backing to the revised affordable rent definition. No change to planning approach, but application of the approach</p> <p>In conjunction with proposed Early Minor Alterations, reflects and makes clear delivery of affordable housing should be maximised and take into account the new funding model for affordable housing. Clarification to early minor alteration. No change to overall effect of the policy or approach of the Plan (as proposed by the early minor alteration)</p> <p>The use of the word 'robust' implies a strengthening in the procedural element covered by this policy. Supporting text is already strong so no anticipated change to the overall effect of the policy and approach in the Plan.</p> <p>Factual changes which clarify the London Plan policy approach in relation to the NPPF. No change to the overall effect of the policy or approach in the Plan.</p> <p>Factual changes reflecting updates in national legislation. Provide clarification on how health and social care provision will be planned for in London. No change to the overall policies and approach in the Plan.</p> <p>Factual changes reflecting updates in national legislation. Provide clarification on how health and social care provision will be planned for in London. Factual changes reflecting exact wording of nation planning policy for traveller sites. In addition to the proposed change to policy, minor change to effect of the policy. Other factual changes in relation to housing and the NPPF. No change to the overall policies and approach in the Plan.</p> <p>Endorse existing policies, based on London's specific local circumstances in response to guidance on housing in the NPPF. No change to the overall policies and approach in the Plan.</p>	<p>Yes</p> <p>No*</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>Yes</p> <p>No</p> <p>No</p>
Chapter 4 - London's Economy	<p>Minor changes to the supporting text to reflect the NPPF and sustainable development, specifically global competition and a low carbon future.</p>	<p>Clarifies the wider aspects of sustainable economic development in line with the NPPF. No change to overall approach in the Plan.</p>	<p>No</p>

Chapter 5 - London's response to Climate Change	Minor changes to references within policies reflecting the revocation of PPSs and publication of the NPPF and technical guidance.	Factual changes which clarify the London Plan policy approach in relation to the NPPF. No change to the overall effect of the policies or approach in the Plan.	No
	Minor changes to the supporting text to reflect the NPPF and the scope of sustainable development. Minor changes noting emerging national regulations. Minor changes to the supporting text reflecting revocation of PPSs and publication of the NPPF and technical guidance, with specific reference to community led renewable and low carbon energy schemes and potentially contaminating land uses.	Factual changes which clarify the London Plan approach in relation to the NPPF. No change to the overall effect of the policy or approach in the Plan.	No
Chapter 6 - London's Transport	Minor changes to policy seeking boroughs to use CIL to fund transport infrastructure instead of s106 planning obligations. Reflects introduction of CIL regulations.	Factual change that still encourages boroughs to identify and collect funds to support transport infrastructure. No change to the overall effect of the policy or approach in the Plan.	No
	Minor changes to the supporting text reflecting the revocation of PPSs and publication of the NPPF and CIL regulations.	Factual changes which clarify the London Plan policy approach in relation to the NPPF. No change to the overall effect of the policy or approach in the Plan.	No
Chapter 7 - London's Living Spaces and Places	Minor changes to references in the policy reflecting the revocation of PPSs and publication of the NPPF.	Factual changes which clarify the London Plan policy approach in relation to the NPPF. No change to the overall effect of the policy or overall approach in the Plan.	No
	Minor changes to policy noting emerging national policy.	Factual change noting emerging national policy that schemes will have to take into account when published, whether included in the London Plan policy or not. No change to the effect of the policy or overall approach in the Plan.	No
	Minor changes to the supporting text reflecting the revocation of PPSs and publication.	Factual changes noting new policies introduced by the NPPF and clarification regarding the London Plan approach in relation to the NPPF.	No
Chapter 8 - Summary	Minor changes to policy and supporting text to address the introduction of CIL regulations and their effect on how funds are collected to deliver infrastructure instead of through s106 planning obligations.	Clarify policy approach and procedures following introduction of the CIL regulations. These are national changes that affect the way funds can be collected for infrastructure to fund mitigation measures relating to planning applications. Procedural changes that don't alter the overall effect of the policy or approach of	No

		the Plan.	
Glossary	Amend definition of heritage assets to clarify that includes non-designated assets that are identified by the local planning authority through the plan making process.	Reflects National Policy. No change to London Plan policy.	No

* this proposed change is to the early minor alteration to the London Plan and it is considered the impacts of this has already been appraised as part of those alterations