

Integrated Impact Assessment: Non-Technical Summary

Draft London Plan

Greater London Authority

Final report

Prepared by LUC

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Chapter 1

Non-Technical Summary

Introduction

1.1 The Greater London Authority in collaboration with LUC has carried out an Integrated Impact Assessment (IIA) of the draft London Plan. The IIA addresses the Mayor's legal duties to carry out a comprehensive assessment of the new London Plan and its proposed policies with one integrated process.

1.2 The IIA includes Sustainability Appraisal/Strategic Environmental Assessment, Health Impact Assessment, Community Safety Impact Assessment, and Equality Impact Assessment. IIA is a process used to identify the likely significant effects of a plan and ways of minimising its negative effects and maximising its positive effects. It runs alongside plan-making so that it can help to shape decisions, consider and inform alternatives and identify mitigation opportunities. The IIA also records the rationale behind the plan, providing an explanation for why particular choices were made.

1.3 The new London Plan will replace the existing London Plan (2021) and cover a period of 20 years from adoption (estimated 2028). The new London Plan will include a spatial strategy that will serve as the overarching policy for growth, including broad locations for growth to meet London's identified needs and associated strategic infrastructure requirements. The new London Plan will also include thematic policies focused on refreshed good growth objectives.

1.4 The new London Plan is being developed in a significantly different context than the current London Plan, most notably the requirement set by national government to plan for 84,884 new homes per year. This scale of growth will inevitably result in some impacts. The growth challenges faced by London can be tackled by applying different approaches and policy levers, various combinations of which will result in different spatial patterns of development.

1.5 This report is the Non-Technical Summary of the full IIA Report. It has to include a summary of all the information required by the Environmental Assessment of Plans and Programmes (or 'SEA') Regulations 2004 (UKSI No. 1633), therefore it is longer and contains more content than a typical Executive Summary might.

Method

1.6 The IIA integrates a number of types of assessment:

- **Sustainability Appraisal incorporating Strategic Environmental Assessment**, which considers the environmental, social and economic effects of the plan.
- **Health Impact Assessment**, which focuses on potential effects on human health.
- **Equality Impact Assessment**, which considers equalities issues and avoidance of discrimination against specific groups with protected characteristics contained in the Equality Act 2010, such as age, gender, race and disability.
- **Community Safety Impact Assessment**, which aims to improve community safety.

Scoping

1.7 The IIA began with a 'Scoping' process. This brought together information about current and emerging baseline social, environmental and economic conditions and issues across Greater London that the London Plan could try to address. It also set out the relevant national planning policy objectives the London Plan must or should aim to achieve.

1.8 The information about existing issues and national policy requirements was used to develop a set of environmental and sustainability objectives (known as the IIA framework) against which the likely effects of the London Plan, including reasonable alternatives, could be assessed.

1.9 The IIA framework is presented at the end of Chapter 4 in the full IIA Report, but in summary it contains nine overarching objectives covering the following topics, which were also informed by the legal requirements of the SEA Regulations and the Equality Act:

- Best use of land and resources;
- Housing;
- Economic potential;
- Successful placemaking;
- Health and community safety;

- Equality of opportunity;
- Climate change;
- Biodiversity and geodiversity; and
- Historic environment.

1.10 Consultation on the IIA Scoping Report was undertaken between 19 December 2025 and 13 February 2026. Appendix B of the full IIA Report lists the comments that were received on the scope of the IIA during this period and describes how each one was addressed in this IIA Report. In light of the comments received, a number of amendments were made to the review of policies, plans and programmes, the baseline information and the key sustainability issues, in addition to the IIA framework. These amendments are reflected in the IIA Report, which accompanies consultation on the draft London Plan.

Assessing effects

1.11 The IIA identifies what effects different aspects of the London Plan are expected to have on the IIA objectives. The effects can be positive or negative, significant or minor. Mixed effects are also identified in some cases, where directly opposing effects are expected. The colour-coded symbols used to represent the magnitude (significant or minor) and direction (positive or negative) of the effects are shown in **Table 1**.

Table 1: Key to IIA effects symbols and colour coding

Symbol and Colour Coding	Description
++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
++/-	Mixed significant positive and minor negative effects likely
--/+	Mixed significant negative and minor positive effects likely
+/-	Mixed minor positive and minor negative effects likely
++/--	Mixed significant positive and significant negative effects likely

Symbol and Colour Coding	Description
?	Likely effect uncertain at this stage in the planning process and/or due to lack of data//information
N/A	Not applicable

1.12 The SEA Regulations require the report to identify any technical difficulties or limitations encountered in the process. For the London Plan IIA, these mainly related to the level of detail of the appraisal of the Green Belt Broad Locations for Growth and the spatial data that was available to inform the IIA.

Reporting

1.13 The full IIA Report describes the process that has been undertaken to date in carrying out the IIA of the draft London Plan. It sets out the IIA findings for the policies in the draft London Plan consultation document, as well as the reasonable alternatives considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where relevant.

Policy context and key sustainability issues

1.14 The London Plan is not prepared in isolation and must be in accordance with a range of international, national and sub-national plans and programmes. The document needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage.

1.15 The London Plan must also align with environmental protection legislation and the sustainability objectives established at an international, national and regional level. At the international level, there is a wide range of plans and programmes that inform and shape national level legislation. Planning policy in England at a national, regional and local level (i.e. the National Planning Policy Framework, SDSs and Local Plans) should be aware of and in accordance with the relevant legislation. There is also an extensive range of national policies, plans and programmes that are of relevance to the London Plan and IIA process. The main sustainability objectives of international and national plans and programmes that are of most relevance for the London Plan and the IIA are described in Appendix C of the IIA Report and also informed the IIA framework.

1.16 Through the review of both the relevant plans, policies, and programmes (Chapter 3 and Appendix C) and the baseline information (Appendix D), key environmental, social and economic issues and challenges facing London have been identified in Chapter 4 of the IIA Report. In accordance with the requirements of the SEA Regulations, consideration is given to the likely evolution of these issues if the new London Plan were not to be implemented. It is important to note that the absence of a new London Plan would not result in growth and development in London coming to a halt. The National Planning Policy Framework (NPPF) and adopted Local Plans would continue to operate as key planning considerations and would play an important role in guiding development in London. In this context, development proposals would continue to be assessed against the provisions of the NPPF, with the presumption in favour of sustainable development applying where development plan policies are considered out-of-date.

1.17 Over time, however, the existing London Plan (2021) would become increasingly outdated and greater weight would be afforded to the NPPF and Local Plans in decision-making.

1.18 The key issues by topic are listed below:

- Population growth and demographic change
 - London's evolving and increasingly diverse demographic profile, which is characterised by continued population growth, ageing residents, declining proportions of children, and high rates of change, is creating shifting and competing demands for housing, land, and social and economic infrastructure.
- Climate change mitigation and adaptation
 - London faces a growing and unequal challenge in responding to climate change: failing to meet net-zero targets while needing to upgrade energy systems, reduce emissions, and ensure new development is resilient, amid increasing risks from extreme weather and rising vulnerability among disadvantaged and ageing populations.
- Health and community safety
 - There are significant and interrelated health, environmental, and safety inequalities in London, which are influenced by deprivation, air pollution, and the built environment. These are contributing to poorer health outcomes, increased pressure on services, and disproportionate impacts on vulnerable and disadvantaged groups.
- Equality of opportunity

- Despite being the richest city in the UK, London also has the most people in poverty and significant inequality amongst Londoners. There are a number of disadvantaged areas where poverty, deprivation, unequal access to services and transport, poor housing quality, and social isolation exist, all of which disproportionately affects vulnerable and disadvantaged groups and limits equitable access to opportunities, wellbeing, and quality of life.
- Biodiversity and ecosystem services
 - Biodiversity in London is under increasing pressure from development, pollution, and climate change. Efforts to enhance access to nature and deliver biodiversity improvements must balance potential impacts on sensitive habitats and ecosystems, alongside the need to restore degraded waterways and protect ecological resilience.
- Best use of land and resources
 - Intensifying pressure from competing land uses driven by growth and housing demand, requires strategic planning to balance development with the delivery of infrastructure, sustainable transport, resource efficiency, and climate-resilient systems.
- Successful placemaking
 - Development also places pressure on London's heritage, character, and distinctiveness, requiring better-coordinated development and infrastructure to support vibrant, accessible town centres and improve liveability.
- Housing
 - London faces rapidly rising housing need and declining delivery exacerbated by affordability pressures, quality and suitability issues, resulting in worsening access to safe, secure, and affordable homes and significant social, economic, and health impacts.
- Economic potential and employment
 - London's economy faces structural challenges from uneven growth, declining productivity, and rising inequality, compounded by pressures on infrastructure, workspace provision, and changing work patterns. These can constrain its competitiveness, the vitality of town centres, and inclusive access to economic opportunities.

Identifying and appraising alternatives

1.19 An important part of the IIA process is to assess reasonable alternatives to what the plan is proposing. In particular, the IIA sets out:

- How reasonable alternatives were identified.
- The assessment findings for these alternatives.
- Why the preferred alternatives have been chosen and others rejected.

1.20 The IIA of alternatives (or ‘options’) aims to identify parts of the London Plan where clear alternative approaches exist. Most of the reasonable alternatives considered by the GLA related to the total amount and broad spatial distribution of development in Greater London. The distribution of development and amount of growth that can be accommodated in an area is referred to as the spatial strategy. In addition, the GLA considered some reasonable alternative policy approaches when drafting the London Plan policies, although there were not many due to the need for the London Plan to be in alignment with national planning policy. Where there were possible alternative approaches that were still in line with national planning policy and not simply to have no policy, these are identified under the relevant policy and an assessment given in Chapter 6 of the full IIA Report.

Identification of spatial strategy options

1.21 The options for the spatial strategy comprise a number of ‘building blocks’ or sources of supply, which are locations within Greater London that could be redeveloped or newly developed to accommodate the new homes and employment land that the London Plan needs to deliver, i.e.:

- Brownfield large sites;
- Small sites;
- Industrial land – release of some SIL/LSIS and non-designated land for residential use;
- Green Belt Industrial Broad Locations for Growth (BLGs);
- Green Belt Residential BLGs around existing transport connections with some assumed enhancements; and
- Green Belt Residential BLGs around potential future transport connections.

1.22 The process undertaken by the GLA for identifying the capacity each of these sources of supply could deliver in terms of new residential, mixed use or industrial

growth involved, in the urban brownfield context, using the SHLAA process which excluded and discounted capacity based on various environmental constraints, and considering optimising density around existing or planned sustainable transport connectivity.

1.23 In the greenfield, Green Belt context, the GLA started by identifying BLGs based on their transport connectivity. For residential-led development, this was done by applying a buffer around stations with a good level of service to key destinations including central London. For industrial BLGs a buffer was applied around HGV suitable road junctions. In both cases, land was then excluded if affected by one or more primary constraints (which are physical or statutory, mostly environmental, limitations on development). By taking this approach, the GLA sought to anticipate and proactively manage many potential environmental impacts that might be identified through this IIA.

1.24 Given there were potential choices to be made between the BLGs in the Green Belt for the overall spatial strategy, each of the Residential and Industrial BLGs were considered to be reasonable alternatives for locating some of the residential and employment growth needed. The IIA effects identified for each BLG are presented in Appendix F of the full IIA Report. The assessment of the reasonable alternative BLGs (through the GLA's own studies, the IIA and the HRA) helps to inform the development of the overall spatial strategy by:

- Enabling comparison between the BLGs, to help with discounting some in the case any were not needed, and also to determine whether any of the BLGs would have such significant negative effect as to warrant exclusion from the strategy.
- Highlighting where the London Plan needed strong policies to ensure positive impacts and manage negative effects.
- For the 20 year Residential BLGs (future candidate BLGs) helping to highlight what further investigation needs to be done to make them acceptable.

1.25 It is important to appraise the BLGs in a consistent manner, therefore the IIA used specifically defined criteria for determining significant versus minor effects (as set out in Appendix E). However, it should be noted that there are not substantial differences in IIA effects between the BLGs as presented in Appendix F. This is a limitation of such a strategic assessment as is required for the scale of the London Plan.

1.26 Drawing on the work above, the amount of development the different sources of supply could help to deliver under six different spatial strategy options considered by the GLA is listed below:

- Option 1: Urban intensification (delivers approximately 500-560k homes).
- Option 2: More intensification plus Green Belt release (delivers approximately 560-650k homes).
- Option 2A: More intensification plus NPPF-led Grey Belt development (delivers approximately 560-600k homes).
- Option 3: Further Green Belt release associated with major new transport investment (delivers approximately 650-700k homes).
- Option 4A: Meeting 850k in 10 years – requires huge step change in investment and delivery capacity (delivers 850k homes).
- Option 4B: Meeting 850k over longer time frame (delivers 850k homes).

1.27 Option 4A was discounted as being a reasonable alternative, as the significant scale of growth required within 10 years was found by the GLA to be unachievable mainly due to the implausible step up of overall delivery assumed including of mitigating infrastructure (such as transport connections). This level of housing delivery far exceeds anything achieved in recent times and would start from a position of unprecedented low delivery. Given the high risk of failure, this could mean growth without necessary mitigation due to required infrastructure not keeping pace. In order to maximise chances of delivery, it would also require loosening of plan-led approaches which would also likely result in unmitigated growth and other adverse impacts such as on economic functionality (e.g. due to high rates of uncoordinated industrial land release). Or given national policy that penalises ‘under-delivery’ against a target, it could very easily result in loss of a plan-led approach undermining the ability to achieve the plan’s objectives (and mitigations of adverse impacts) in the round.

Assessment findings for spatial strategy options

1.28 Chapter 5 of the full IIA Report provides a detailed description of the likely effects of the spatial strategy options in relation to each IIA objective. The effects in relation to each IIA objective are shown in **Table 2** with a summary of the overall performance of the options discussed below the table.

Table 2: Likely IIA effects of the spatial strategy options

IIA Objective	Option 1 – Urban intensification	Option 2 – More intensification plus Green Belt release	Option 2A – More intensification plus Grey Belt	Option 3 – Further Green Belt release	Option 4B – Meeting 850k over longer time frame
IIA1: Best use of land and resources	++/-	++/-	++/--	++/-	++/--
IIA2: Housing	+/-	+/-	--/+	++/-	++
IIA3: Economic potential	+	++	++	++	++
IIA4: Successful placemaking	+/-?	++/-?	--?/+	++/-?	++/--?
IIA5: Health and community safety	+/-?	++/-?	--?/+	++/-?	++/-?
IIA6: Equality of opportunity	+	++	+	++	++
IIA7: Climate change	++/-?	++/-?	++/--?	++/-?	++/-?
IIA8: Biodiversity and geodiversity	+/-?	--?/+	--?	--?/+	--?/+
IIA9: Historic environment	--?	--?	--?	--?	--?

1.29 Given the significant increase in housing and employment development that would be delivered through all of the spatial strategy options, they are all considered likely to have a mix of positive and negative sustainability effects. Similarly, as they all comprise a large portion of brownfield intensification of the existing built up area, they have a number of similar effects. The differences arise due to the increasing scale of growth that would be delivered between Options 1 and 4B, as well as the fact that Option 1 would only involve very limited development in the Green Belt. In addition, while Option 2A would result in greenfield development within the Green Belt, it would not for the most part be targeted to the identified residential BLGs which are well-located around existing and potential future public transport stations. Instead, it would be more scattered and likely smaller scale, low density on parcels of land that have potential to be identified as grey belt.

1.30 Therefore, Option 1 has the least potential for significant positive or negative effects. Option 2A is considered likely to have the most significant negative effects, in relation to almost all of the IIA objectives (except IIA objective 2: Economic potential and IIA objective 6: Equality of opportunity for which it has positive effects relating to the brownfield intensification that all of the options include, as well as delivery of additional industrial land at some of the BLGs in the Green Belt). Options 2, 3 and 4B have more positive effects overall than Options 1 and 2A. Option 3 has slightly more potential for significant positive effects than Option 2 as it would get closer to delivering the standard method requirement for housing. Option 4B has the same potential for significant positive effects as Option 3, but slightly more significant negative effects because it has the highest amount of new housing to be delivered (albeit over 20 years not 10) and therefore would result in the highest intensification in the urban area, plus the largest extent of greenfield development in the Green Belt.

1.31 However, many of the potential negative effects identified are uncertain because they will depend on the way in which the new development is delivered. This will be determined by the requirements within the development management related policies in the draft London Plan and policies (development management and site allocations) contained in relevant Local Plans. As the appraisal of the draft policies explains, many of those effects, (and those likewise identified in the individual Green Belt BLG IIA findings in Appendix F) are anticipated and proactively addressed by the full suite of policies drafted for the London Plan which will operate alongside the NPPF.

Reasons for choosing the preferred spatial strategy

1.32 The preferred growth option selected is mostly aligned with Option 2 while reflecting some of the spatial aspects of Option 3. This is notably in relation to Green Belt, as related transport interventions were reviewed and agreed to be more

deliverable and/or committed than major schemes in the urban area within 10 years. This meant wider station buffers could be applied (the definition of certain sustainable locations grew larger) bringing higher housing numbers into consideration. Other capacity uplifts associated with Option 3 and related transport interventions were however not ultimately considered to be reasonably plausible, bringing similar risks to those identified with Option 4A that was earlier discounted. As a strategic IIA cannot precisely define a tipping point in relation to the impact of different levels of growth, it is this assessment of deliverability and need to manage the risks of un-mitigated or uncoordinated growth, that is particularly influential in selecting the preferred spatial strategy.

1.33 As SHLAA work continued alongside the IIA, the GLA also found additional suitable industrial release and small sites potential associated with existing transport connectivity compared to what had originally been assumed in Option 2. However, this was largely offset by downward pressures associated with viability – very significant viability issues have brought overall assumed delivery down, particularly in brownfield outer London. As such the preferred option is proportionately more reliant on capacity types and locations that are more viable including small sites and more central and accessible locations. This brings a mix of likely positive and negative effects.

1.34 Overall, the preferred spatial strategy is most influenced by the IIA findings for Option 2A as contrary to the plan-led approach that focuses development and mitigation effort on a limited number of locations. This means strategic mitigation (such as public transport investment) is spread too thinly reducing its effectiveness, and positive opportunities related to the scale of development (such as to support new shops and services and environmental enhancements) are reduced. The preferred spatial strategy conversely focuses development in a limited number of Green Belt residential-led BLGs with critical mass in the green belt, while providing for a sufficient range of these and industrial Green Belt locations to help increase the likelihood of overall delivery to meet economic and housing needs. The range of other types of brownfield capacity drawn on in a plan-led way likewise bring important delivery source diversity, increasing the chances of needs being met while spreading infrastructure and environmental impacts (more likely to be absorbable in the existing urban area, but potentially more difficult to manage) and benefits.

1.35 The policies developed to go with the preferred spatial strategy also make provision for the positive effects that the IIA framework strategic spatial options assessment criteria indicate should be considered in respect of environmental and place-making opportunity (see IIA framework and criteria at the end of Chapter 4). For instance, the draft London Plan includes environmental opportunity areas of various sub-types that development can help to deliver, with potential for nature

recovery, water quality improvement, and improved access to green space. It also ensures that the approach to industrial release continues to protect important economic functionality, such as access to water-based transport, other good freight connections and infrastructure uses. It also makes provision for a wide range of strategic infrastructure that will help meet the social, health, environmental and economic needs of existing and future residents and businesses. This includes for instance the ability for residents and businesses to decarbonise their energy use and benefit from improved flood resilience.

1.36 Lastly the spatial strategy acknowledges the benefits demonstrated in respect of option 4B ultimately reaching the housing need number but over a longer time frame. It does so by identifying the 20 year future candidate BLGs in the urban area and Green Belt that should be safeguarded in order to optimise their future growth potential. It also requires that the uncertainties over their development potential are positively engaged with, to make them either more certain and dependable, or to enable such locations to be ruled out in a subsequent round of plan-making. The broader policy approach of the plan should also help embed the mitigations required to manage the potentially more significant effects of this scale of growth.

Appraising the Draft London Plan policies

1.37 The draft London Plan policies were appraised independently of one another, and the findings are summarised below.

Making best use of land and achieving Good Growth

1.38 Chapter 2 of the draft London Plan sets out the spatial strategy for Greater London, as well as addressing sustainable transport, the built environment and further related topics.

1.39 Overall, the appraisal found that the policies in this chapter are likely to make a positive contribution towards achieving sustainable development across London, particularly due to the focus on brownfield intensification. In particular, the policies performed well against IIA objective 4: Successful placemaking due to their focus on delivering well-designed, context-responsive development, making efficient use of land and supporting the creation of quality places. However, minor negative effects were also identified in relation to IIA objective 1: Best use of land and resources due to the spatial strategy's need to propose some broad locations for growth on greenfield land.

1.40 Significant positive effects are also identified in relation to IIA objectives 2: Housing and 5: Health and community safety. This is because the policies support the delivery of new homes, including higher-density development in appropriate locations, while encouraging growth in areas with good access to jobs, services and public transport. Measures to create inclusive, accessible and active environments are also expected to support health and wellbeing outcomes, with significant positive effects also identified in relation to IIA objective 6: Equality of opportunity.

1.41 The appraisal identified some mixed effects in relation to IIA objectives 7: Climate change, 8: Biodiversity and geodiversity and 9: Historic environment. The brownfield first focus of policies in this chapter and support for higher-density development in locations with good sustainable transport accessibility, supports reductions in transport-related emissions. However, increased density in the existing built up area could also exacerbate risks such as urban heat island effects and surface water flooding if not accompanied by climate-resilient design measures, which are addressed in other policies in the plan. While some of the policies in this chapter contain safeguards and opportunities for biodiversity and historic environment enhancement, the effects will depend on the location and design of development proposals. In some cases, higher-density development and intensified land use could result in localised pressures on environmental and heritage assets if not carefully managed.

Delivering the homes and neighbourhoods Londoners need

1.42 Chapter 3 of the draft London Plan sets out policies for housing in London.

1.43 The appraisal indicates that the policies in this chapter are expected to have positive effects overall, particularly in relation to IIA objective 2: Housing. Almost all policies score positively, with several significant positive effects, reflecting the policy focus on increasing housing supply and supporting delivery across London. However, a minor negative effect for IIA objective 2: Housing is also identified due to the draft London Plan not meeting the full standard method housing requirement. Positive effects are recorded for IIA objective 6: Equality of opportunity, highlighting the role of housing provision in meeting the accommodation needs of different people and reducing inequalities. Additional significant positive effects are identified for IIA objective 5: Health and community safety, reflecting the contribution that new and improved housing can make to health and wellbeing.

Growing London's economy in a way that benefits all

1.44 Chapter 4 of the draft London Plan sets out policies related to London's economy.

1.45 The appraisal findings show that the policies in this chapter are expected to have positive effects overall, particularly in relation to IIA objective 3: Economic potential, where almost all policies score positively and several achieve significant positive effects. This reflects a clear emphasis on supporting economic growth, business activity and employment across London. Notable significant positive effects are also identified for IIA objective 1: Best use of land and resources, highlighting the efficient use and intensification of land to support economic functions.

1.46 Additional positive effects are observed for IIA objectives 6: Equality of opportunity and 7: Climate change, although these are generally more variable across the policies. Some policies perform well in relation to equality and inclusion, indicating support for more inclusive access to economic opportunities. Similarly, positive effects in relation to climate change reflect support for sustainably located economic development in areas with strong public transport and opportunities for walking and wheeling, reducing transport-related carbon emissions. However, effects are not uniform across all policies, with some minor negative effects also identified in relation to IIA objective 5: Health and community safety, 7: Climate change, 8: Biodiversity and geodiversity and 9: Historic environment. These effects are mainly due to the locations identified for industrial, storage and distribution uses, which are typically located in areas that are better connected to the strategic road network and therefore may have a higher proportion of private vehicle movements and possible localised air pollution.

Creating a greener, healthier, and resilient city

1.47 Chapter 5 of the draft London Plan sets out policies related to the environment, net zero carbon, pollution and health outcomes.

1.48 The appraisal findings show that the policies in this chapter are expected to have almost exclusively positive effects overall, particularly in relation to IIA objective 7: Climate change, where the majority of policies achieve positive or significant positive effects. This reflects a clear focus on reducing emissions and improving climate resilience. Significant positive effects are also evident for IIA objectives 1: Best use of land and resources and 8: Biodiversity and geodiversity, with several policies achieving significant effects, highlighting the emphasis on resource efficiency and environmental enhancement. One mixed minor positive and minor negative effect is identified for IIA objective 3: Economic potential, due to the requirement for

higher energy efficiency standards in Policy GH1 which may impact build costs for non-residential development.

1.49 Additional significant positive effects are identified for IIA objective 5: Health and community safety, reflecting the role of environmental improvements in supporting healthier lifestyles and more inclusive access to quality environments.

Place visions and place-based approaches

1.50 Chapter 6 of the draft London Plan sets out the eight policies related to place-based approaches, including Brownfield First Opportunity Areas (BFOAs), the Central Activities Zone (CAZ) and strategic economic clusters and corridors.

1.51 The appraisal shows that the policies in this chapter are expected to have a number of positive effects, particularly in relation to IIA objectives 1: Best use of land and resources, 3: Economic potential and 4: Successful placemaking. A number of policies achieve significant positive effects across these objectives, reflecting a clear focus on optimising land use, supporting growth in key locations such as town centres, the CAZ and Brownfield First Opportunity Areas and delivering quality integrated places. A number of positive effects are also evident for IIA objective 2: Housing, particularly for Policy PV3 Town centres and high streets, indicating the role of place-based approaches in supporting housing delivery in central locations. However, some of these positive effects are mixed with potential minor negative effects due mainly to the need to also develop on greenfield land, which is a less efficient use of land and may have potential to affect existing character, biodiversity or heritage assets (particularly in relation to Policy PV7 Sustainable development and enhancement of the Green Belt).

1.52 Some significant positive effects are also identified for IIA objective 6: Equality of opportunity, as the policies support growth in employment, which will help ensure more opportunities for all. Significant positive effects are also identified for IIA objective 9: Historic environment, as some of the policies support the conservation and enhancement of heritage assets and their settings.

Cumulative effects

1.53 The effects of the draft London Plan as a whole are referred to as 'cumulative effects' and are set out in Chapter 7 of the full IIA Report.

1.54 The total effects of all the policies in the draft London Plan on each of the IIA objectives are presented in **Table 3** below and the cumulative effects of the draft London Plan as a whole are presented in **Table 4**.

Table 3: Total effects of the draft London Plan

Policy	IIA 1: Best use of land and resources	IIA2: Housing	IIA3: Economic potential	IIA4: Successful placemaking	IIA5: Health and community safety	IIA6: Equality of opportunity	IIA7: Climate change	IIA8: Biodiversity and geodiversity	IIA9: Historic environment
Policy MBUL1 Spatial strategy	++/-	++/-	++	+	+/-	+	+/-	+/-	+/-?
Policy MBUL2 Optimising the use of land and site capacity	++	++?	0	++	+	0	+/-	+/-	0
Policy MBUL3 Tall buildings	++/-	0	+	++	+	0	-	0	+
Policy MBUL4 Utilities – capacity, connectivity, and resilience	0	0	+	0	0	0	+	0	0
Policy MBUL5 Sustainable transport to enable London's growth	+	+	+	++	++	+	+	+	0
Policy MBUL6 High quality design for a growing, changing city	+	0	0	++	+	+	+	0	0
Policy MBUL7 London's heritage	0	0	+	+	0	+	+?	0	++
Policy MBUL8 Inclusive design	0	+	+	+	+	++	0	0	0
Policy MBUL9 Healthy streets and public realm	+	0	+	++	++	++	+	+	0
Policy MBUL10 Security and safety	0	0	0	0	++	+	-	-	0
Policy HN1 Increasing London's housing stock	++/-	++/-	+	0	+	+	0	0	0
Policy HN2 Protecting and reshaping housing	+	++	0	0	+	+	?	0	0
Policy HN3 Delivering affordable housing	0	++	+	+/-	+	+	0	0	0
Policy HN4 Gypsy and Traveller accommodation	0	++	0	0	+	++	0	0	0
Policy HN5 Managing specialist accommodation	0	++	+	0	+	++	+	0	0
Policy HN6 Build to rent	0	++	0	0	0	+	0	0	0
Policy HN7 Housing size mix	0	+	0	0	0	+	0	0	0
Policy HN8 Housing design	0	++?	0	+?	++	+	+	+	0
Policy HN9 Accessible housing	0	++	0	0	++	++	0	0	0
Policy HN10 Burial space	+	0	0	0	0	++	0	+	0
Policy GLE1 Sufficient and appropriate employment space	++	0	++	+	+	+	-	0	0
Policy GLE2 Supply of industrial land	++/-	+	++	0	0	0	+	0	0
Policy GLE3 Data centres	+?	0	++	0	-?	-?	+/-	0	0
Policy GLE4 Night-time economy	0	0	++	0	+	+	0	0	+
Policy GLE5 Culture and creative industries	+	0	++	++	+	+	+	0	0
Policy GLE6 Visitor infrastructure	+	+	++	+	+	+	+	0	0
Policy GLE7 Affordable workspace	0	0	++	+	0	++	0	0	0
Policy GLE8 Access to employment and skills	0	0	++	0	+	++	0	0	0
Policy GLE9 Aviation	+	0	+/-	0	+	+	++	0	0
Policy GLE10 Safeguarded Wharves	++/-	0	+	0	+/-	0	+	-	0
Policy GLE11 Circular economy	++	0	+	0	0	0	++	0	0

Policy	IIA 1: Best use of land and resources	IIA2: Housing	IIA3: Economic potential	IIA4: Successful placemaking	IIA5: Health and community safety	IIA6: Equality of opportunity	IIA7: Climate change	IIA8: Biodiversity and geodiversity	IIA9: Historic environment
Policy GLE12 Waste	++	0	+	0	0	0	+	0	0
Policy GLE13 Aggregates and mineral resources	++	0	+	0	+	0	+	+	0
Policy GHR1 Energy efficiency	+	?	+/-	0	0	+	++	0	0
Policy GHR2 Low cost low carbon heat	++	0	+	0	0	+	++	0	0
Policy GHR3 Whole life carbon	++	0	0	0	0	0	++	0	0
Policy GHR4 Heat risk	0	?	0	0	+	+	++	+	0
Policy GHR5 Flood risk and drainage	+	0	+	0	+	+	++	+	0
Policy GHR6 Trees, biodiversity and geodiversity	+	0	0	+	+	+	+	++	0
Policy GHR7 Green infrastructure and Urban Greening Factor	0	0	0	+	+	0	+	+	0
Policy GHR8 Accessible green space	+	0	0	+	++	++	++	++	0
Policy GHR9 Clean and healthy waterways	++	0	0	+	+	+	+	++/-	+
Policy GHR10 Air quality	0	0	0	0	++	+	?	+	0
Policy GHR11 Cycle and car parking	+	?	0	+	+	+	++	0	0
Policy PV1 Brownfield First Opportunity Areas (BFOAs)	++	+	++	++	+	+	+	+	+
Policy PV2 Central Activities Zone (CAZ)	++	+	+	++	+/-	++?	+/-	+/-	++/-
Policy PV3 Town centres and high streets	++	++	++	++	+/-	++	+	+	0
Policy PV4 Strategic economic clusters and corridors	+/-	+	++	+	+	+	+/-	0	0
Policy PV5 Industrial land supporting housing growth	+	+	++	0	0	0	0	0	0
Policy PV6 Metropolitan Open Land (MOL)	+	-	0	+	++	+	++	++	+
Policy PV7 Sustainable development and enhancement of the green belt	++/--	++/-	++/-	++/-?	+/-	+	+/-	+/-	0
Policy PV8 Strategic and local views	0	0	+	++	0	0	0	0	++

IIA objective 1: Best use of land and resources

1.55 Pressure for development and competition between different land uses is increasing across London. The new standard method housing requirement means London needs to accommodate higher housing and growth targets than before, and even with higher density development, this cannot all be met on previously developed land, therefore some Green Belt land will need to be released. Without careful management this could lead to unsustainable patterns of development and inefficient use of land. Competing pressures for land also impacts on the ability to provide necessary social, physical, and environmental infrastructure to support the growing population. Increased levels of development impact on the consumption and availability of finite resources including water, energy and mineral derived materials.

1.56 The draft London Plan seeks to make the best use of land by maximising intensification of the existing urban area and delivering as much of the required development as possible on brownfield land. Policy MBUL2 Optimising the use of land and site capacity requires plan-making authorities to take full advantage of existing and planned levels of sustainable transport connectivity, while also giving consideration to the scale, height and form of development to ensure efficient use of land. Likewise, Policy MBUL3 Tall buildings supports higher densities in a sustainable way, through the optimisation and efficient use of land. Policy PB1 Brownfield First Opportunity Areas (BFOAs) identifies opportunities for brownfield development, which is an efficient use of land and sometimes involves the reuse of existing, vacant buildings. However, due to the scale of development proposed in the draft London Plan, Policy MBUL1 Spatial strategy requires Local Plans to make provision for further strategic growth beyond the existing built up area, including through Green Belt release in identified BLGs. This will involve the development of greenfield land that may be classed as high quality agricultural land, and so is a less efficient use of land but only comprises a small proportion of the overall growth (approximately 10%).

1.57 Overall, the draft London Plan is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

IIA objective 2: Housing

1.58 To date London's housing stock has not kept pace with population growth. Affordability pressures exist across all tenures, and London is becoming less accessible for families with children, key workers and marginalised Londoners. The draft London Plan seeks to deliver 558,000 new homes, which is just over 65% of the

standard method housing requirement (850,000). However, the evidence studies show that the full requirement cannot be met – even by optimising brownfield sites, increasing densification in more parts of London and releasing targeted areas of the Green Belt around existing public transport stations. Despite the draft London Plan not meeting the standard method housing requirement, it will contribute significantly to housing numbers in London. Policy MBUL1 Spatial Strategy outlines the ways in which Local Plans should support this level of delivery, which includes giving priority to the Growth Corridors, CAZ & the Northern Isle of Dogs, Brownfield First Opportunity Areas and BLGs. Delivery is also supported along growth corridors that extend beyond London's boundary (achieved through cross boundary co-ordination of opportunities), Green Belt release and on small sites. As part of this growth, affordable housing provision will be prioritised. This is particularly important in London where affordable housing delivery has been falling. Through Policy HN3 Delivering affordable housing, the draft London Plan seeks to deliver a large percentage of affordable homes, together with low-cost rent and intermediate homes – some of which will take the Fast Track Route through planning. However, in order to benefit overall delivery numbers, Policy MBUL1 states that some exceptions may be made in relation to the diversity of housing mix, which could limit the provision of affordable housing in the short term.

1.59 There is some potential tension between the policies in the draft London Plan that support new housing development (contained in Chapter 3 'Delivering the homes and neighbourhoods Londoners need' of the draft London Plan) and those that seek to protect and enhance the natural and built environment, such as Policies GHR6 Trees, biodiversity and geodiversity, GHR7 Green infrastructure and Urban Greening Factor and MBUL7 London's heritage. However, it is considered that such policies will serve to direct growth to the most appropriate locations within London, rather than limiting growth.

1.60 Overall, the draft London Plan is expected to have a significant positive (++) effect in relation to IIA objective 2: Housing, mixed with a minor negative effect due to not meeting the full standard method requirement and the potential exceptions to affordable housing priority in the short term.

IIA objective 3: Economic potential

1.61 London is the largest city in western Europe and a global hub for finance, technology, and culture. However, while economic output is growing, productivity has faltered, job quality is uneven and income inequality remains pronounced. Provision of sufficient employment and business space is vital to London's position as a leading global city as well as the ability of local economies to serve local populations.

The draft London Plan requires plan-making authorities to meet diverse economic needs by providing for a range of suitable business spaces. Policy GLE1 Sufficient and appropriate employment space requires employment spaces to be designed flexibly to accommodate a range of uses and occupier sizes, and to facilitate adaptation to future business and community needs. In terms of industrial land, Policy GLE2 Supply of industrial land seeks to meet the needs of businesses that rely on industrial land. Plan-making authorities are required to establish a strategy to meet their industrial needs, including re-activating vacant industrial land and repurposing any arising surplus land in commercial use. Policy MBUL1 outlines the spatial strategy for London, which seeks to build on the success of economic clusters and promotes greater connectivity via sustainable transport, which will help to unlock London's economic potential and improve access to employment opportunities.

1.62 Overall, the draft London Plan is expected to have a significant positive (++) effect in relation to IIA objective 3: Economic potential.

IIA objective 4: Successful placemaking

1.63 London is famous for its built environment and distinctive character that is synonymous with landscape and townscape features, and its combination of old and new. The Green Belt forms 22% of London's land area while 10% is designated Metropolitan Open Land. This includes spaces such as Richmond Park and Hampstead Heath. There are 27 designated views in London (the majority of which are focused along the River Thames), which include significant buildings or urban landscapes. New development will often make a positive contribution to these views. However, development can sometimes compromise the setting or visibility of key landmarks. Generally, though, growth provides an opportunity to enhance the built environment and create new, successful places.

1.64 The draft London Plan supports a significant amount of growth particularly in the existing built up area and while this may alter some of the existing character, there is the potential to enhance it through the quality of development that is delivered. This will be influenced by Policy MBUL6 High quality design for a growing, changing city. The policy requires plan-making authorities to promote good design through the use of design codes and guidance. In determining planning applications, authorities are encouraged to check that development proposals enhance an area and respond positively to local distinctiveness, are of high-quality architectural design and maximise active frontages – all of which will contribute to the vibrancy of an area and help build new, successful places. There are also policies contained in the draft London Plan that seek to protect London's built environment. For example, Policy PV8 Strategic and local views including the London View Management Framework

seeks to preserve and enhance London's views while policies contained within the 'Creating a greener, healthier, and resilient city' chapter of the draft London Plan require Local Plans to secure things like enhancements to green infrastructure, including existing greenspace, which can contribute to the enjoyment and enhancement of place-based assets. Further to this, Policy MBUL3 Tall buildings sets an appropriate framework for the development of tall buildings so as to protect London's landscape and townscape while also supporting tall buildings where appropriate, as they can positively influence London's character and skyline.

1.65 There is also potential for some changes to more open landscapes in outer London where a smaller amount of the required development overall is directed to broad locations for growth in the Green Belt, as set out in Policy MBUL1 Spatial Strategy. However, Policy PV7 Sustainable development and enhancement of the green belt requires development proposals in these locations to meet the nationally set Golden Rules where applicable, and the relevant London Green Belt sustainable design criteria as set out box PV7B. This includes demonstrating a landscape-led approach which delivers high quality accessible green space within the BLG and integrates the development with the surrounding countryside and its key features.

1.66 Overall, the draft London Plan is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

IIA objective 5: Health and community safety

1.67 While London tends to have better health outcomes than the rest of the UK, stark health and socioeconomic inequalities, including ethnic inequalities, remain. Despite significant progress, London still exceeds the World Health Organisation's recommended health-based guidelines for air quality and air pollution from road transport remains an important source of emissions. Impacts of poor air quality do not fall equally across the city; poorer and Black, Asian and Minority Ethnic communities are more likely to live in areas with poorer air quality.

1.68 As part of the IIA, a Health Impact Assessment has been undertaken through the appraisal of policies against IIA objective 5: Health and community safety. The draft London Plan has a brownfield first focus and supports higher-density development in locations with good sustainable transport accessibility. Therefore, it will help to minimise reliance on the private car and contribute to reductions in associated air pollution. Policy GHR10 Air quality specifically seeks to reduce the extent to which Londoners are exposed to poor air quality and together with the Mayor's Transport Strategy (2018) and the London Environment Strategy (2018), has the potential to improve air quality in London over the plan period. This could have positive effects on people's wellbeing, in addition to encouraging walking and cycling

to public transport facilities. Further policies contained in the 'Creating a greener, healthier, and resilient city' chapter of the London Plan will also have positive effects in terms of people's health and wellbeing by reducing and mitigating overheating in London (Policy GHR4 Heat risk), providing accessible green spaces that people can use for recreational purposes (Policies GHR7 Green infrastructure and Urban Greening Factor and GHR8 Accessible green space) and ensuring waterways are clean (Policy GHR9 Clean and healthy waterways). Further to this, Policy MBUL1 Spatial Strategy includes a requirement for Local Plans to secure additional strategic healthcare, emergency services and criminal justice infrastructure, commensurate with expected housing-related population and spatial growth. Despite this, the scale of growth proposed in the draft London Plan and the increased density of development together with additional industrial growth locations for storage, distribution and data centres is still likely to give rise to some localised, temporary negative effects on health related to air quality, light and noise.

1.69 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can impact London's economic competitiveness and tourism. Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations. A Community Safety Impact Assessment has also been undertaken as part of the IIA through IIA objective 5. Policies MBUL9 Healthy Streets and Public Realm and MBUL10 Security and safety in the draft London Plan seek to deliver streets and a public realm that are welcoming, accessible and safe. The policies require plan-making authorities to work with a range of service providers (e.g. the Metropolitan Police Service, the London Fire Commissioner and the Ministry of Justice) to identify community safety needs and the provision of necessary infrastructure to maintain a safe and secure environment, while also referring to the Health and Safety Executive mapping of hazard zones. In terms of development management, development proposals should consider and incorporate design measures to address safety and security measures, including for women and girls and other vulnerable groups, in addition to counter terrorism measures which should be proportionate to threat and consequence. Lastly, major developments of any height should meet the highest standards of fire safety.

1.70 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

IIA objective 6: Equality of opportunity

1.71 Around 1 in 5 Londoners live in relative poverty (after housing costs), and a third of children in London live in poverty. There is a clear pattern that Londoners living in the most deprived areas have poorer outcomes compared with those living in the least deprived areas across various measures (e.g. neighbourhood relationships, trust and social isolation). Experience of poverty, alongside health, wider socio-economic background, housing provision and the ability to engage with the educational system, all impact Londoners' ability to fulfil their potential and gain full access to the employment opportunities the city has to offer.

1.72 The IIA has considered the impacts of the London Plan policies on equality for all Londoners through effects identified in Chapter 6 in relation to IIA objective 6: Equality of opportunity. A separate, standalone EqIA focusing on potential effects of the draft London Plan on groups with protected characteristics in the Equality Act 2010 can be found in Appendix A of this IIA Report.

1.73 The focus on sustainable development and the Good Growth objectives in the draft London Plan promotes accessible and inclusive development, close to a diverse range of existing and new employment opportunities, which has potential to improve overall levels of equality, as well as just for those with protected characteristics. As set out in Appendix A, the draft London Plan is also generally expected to have positive effects on people with protected characteristics (with the exception of marriage and civil partnership, as this characteristic is only protected in relation to discrimination in the workplace, which is not affected by the London Plan).

1.74 The policies on housing aim to provide affordable and diverse options, which ensures the accessibility needs of older people and people with disabilities and limited mobility are met (in particular, Policy HN5 Managing specialist accommodation and Policy HN9 Accessible housing). There is also specific support for Gypsies and Travellers and recognition of their cultural needs (Policy HN4 Gypsy and Traveller accommodation). The draft London Plan promotes inclusive growth through social infrastructure, employment opportunities and environmental protections (e.g. Policy MBUL9 Healthy streets and public realm, Policy GLE7 Affordable workspace, Policy GLE8 Access to employment and skills, Policy GHR6 Trees, biodiversity and geodiversity and Policy GHR10 Air quality), though some potential for adverse effects remains – particularly from localised air pollution linked to the scale of development or potentially polluting forms of development (e.g. industrial development and data centres). The green and health-focused policies further address inequalities by expanding access to nature and mitigating climate impacts (e.g. Policy GHR8 Accessible green space and Policy GHR4 Heat risk), while place-based approaches generally enhance accessibility, safety and local

opportunity (e.g. Policy PV3 Town centres and high streets), despite potential drawbacks linked to high density development and transport limitations.

1.75 Overall, the draft London Plan is expected to have a minor positive (+) effect in relation to IIA objective 6: Equality of opportunity.

IIA objective 7: Climate change

1.76 London's climate is changing, bringing more frequent and severe extreme weather events. Floods, droughts, and heatwaves have cost the city millions of pounds in recent years and harmed the health of many Londoners – particularly those in the most vulnerable communities. The draft London Plan through Policy MBUL1 Spatial strategy, seeks to maximise intensification of development in the existing urban area where sustainable transport accessibility is good, while delivering as much of the required development as possible on brownfield land. This, together with Policy MBUL5 Sustainable transport to enable London's growth, will help minimise greenhouse gas emissions associated with the car, as people will not need to travel far to reach services and facilities and can instead rely on public transport. However, the scale of development sought will likely contribute towards greenhouse gas emissions. This is particularly the case for industrial development and the provision of new data centres which despite mitigation efforts, contribute substantially towards CO2 emissions. Policy GHR1 Energy efficiency will help mitigate this by requiring developments to go beyond national requirements in terms of energy efficiency, while also maximising opportunities for the provision and storage of renewable energy.

1.77 The scale of development proposed will involve increased density within the existing built up area, which could exacerbate the urban heat island effect together with surface water flooding if not accompanied by climate-resilient design measures. Similarly, development of BLGs in the Green Belt would increase impermeable surfaces and contribute to surface water flooding. However, the draft London Plan requires mitigation of these effects through Policies GHR4 Heat risk and GHR5 Flood risk and drainage. Other policies, such as GHR6 Trees, biodiversity and geodiversity and GHR7 Green infrastructure and urban greening factor will help in adapting to the effects of climate change through the provision of trees for shading, and new green spaces and green features as part of development which provide natural sustainable drainage to slow down or retain surface water to reduce flood risk.

1.78 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

IIA objective 8: Biodiversity and geodiversity

1.79 London has a history of being a green city and is now one of the world's greenest cities, becoming the first National Park City in 2019. Around a third of the green space in London is natural habitats, while just under 15% is vegetated private gardens. Over 2.5% of London is made up of blue space, such as rivers, canals and reservoirs. In London, there are three SACs (Richmond Park, Wimbledon Common and Epping Forest) and two SPAs and Ramsar sites (Lee Valley and South West London Waterbodies). There are also several SACs, SPAs and Ramsar sites outside of London but which can be impacted by development in the city and visitors from London. Other important wildlife sites in London are Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves and areas of ancient and semi-natural woodland and ancient replanted woodland, in addition to Sites of Importance for Nature Conservation. London is home to more than 18,000 species, including protected and rare species – many of which are underpinned and influenced by the city's geodiversity. The main bedrocks in London are chalk and London clay, with much of the surface geology made up of sand and gravel. The soils formed from this surface geology produce a complex mosaic of different habitats with distinct plants and wildlife.

1.80 Policy GHR6 Trees, biodiversity and geodiversity contained in the draft London Plan seeks to protect and enhance biodiversity and geodiversity in London by requiring plan-making authorities to protect habitats and species and use evidence from the LNRS to identify opportunities to support nature recovery by creating, expanding and connecting habitats and improving the ecological condition of sites. Further to this, the draft London Plan and the LNRS together with the London Green Infrastructure Framework will help in the delivery of new or improved green infrastructure and inform habitat creation proposals. The prioritisation of brownfield intensification under Policy MBUL1 Spatial strategy will reduce pressure on greenfield land and designated sites and protected habitats, although it is noted that numerous designated biodiversity sites occur in the built up area as well. The spatial strategy allows for targeted greenfield development within the identified Green Belt BLGs which could result in some loss of biodiversity, although Policy GHR6 will help mitigate this. Overall, however, the scale of development proposed in the draft London Plan is still likely to have some localised adverse effects on biodiversity.

1.81 Alongside this IIA, a separate Habitats Regulations Assessment of the draft London Plan has been undertaken to consider the potential for the draft London Plan to impact upon internationally designated biodiversity sites (SACs, SPAs and Ramsar sites). The HRA included a number of recommendations for amendments to policies contained in the draft London Plan – all of which were addressed in the final version of the draft London Plan. As a result, the HRA has concluded that, for most types of

effects considered, the draft London Plan will not have adverse effects on the integrity of SACs, SPAs and Ramsar sites in and around London. Air quality modelling is being conducted in relation to Epping Forest SAC in order to facilitate completion of appropriate assessment.

1.82 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 8: Biodiversity and geodiversity.

IIA objective 9: Historic environment

1.83 London is world-renowned for its heritage. It contains an abundance of heritage assets – all of which contribute significantly to its distinctive character and strong sense of place. The city contains four UNESCO World Heritage Sites (the Tower of London, Westminster, Maritime Greenwich and the Royal Botanic Gardens, Kew) and over 1,000 conservation areas that contain numerous listed buildings. Hundreds of scheduled monuments and registered parks and gardens are also present, in addition to one registered battlefield. Numerous Archaeological Priority Areas are also present across London.

1.84 The scale and intensification of growth required through Policy MBUL1 Spatial Strategy could create opportunities to conserve and enhance London's distinctive heritage assets and their settings. However, due to the extent of heritage assets in London and the scale of development proposed in the draft London Plan, a lot of development will likely take place within close proximity of heritage assets. This has the potential to cause harm to heritage assets and their settings. However, Policy MBUL7 London's heritage helps mitigate this. According to the policy, where plan-making authorities contain one of the four World Heritage Sites, they must include policies in their Development Plan which conserve and protect the World Heritage Site. Likewise, Policy PV2 Central Activities Zone (CAZ) seeks to sustain and enhance the CAZ's world-renowned heritage assets. Policy PV8 Strategic and local views including the London View Management Framework further protects the historic environment by designating Strategic Views, which look towards important landmarks (e.g. the Tower of London) that make a significant historic or cultural contribution to London.

1.85 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 9: Historic environment.

Table 4: Cumulative effects of the draft London Plan by IIA objective

IIA Objective	Draft London Plan
IIA1: Best use of land and resources	++/-
IIA2: Housing	++/-
IIA3: Economic potential	++
IIA4: Successful placemaking	+
IIA5: Health and community safety	+/-
IIA6: Equality of opportunity	+
IIA7: Climate change	+/-
IIA8: Biodiversity and geodiversity	+/-
IIA9: Historic environment	+/-

Next steps

1.86 This Non-Technical Summary will be available for comment alongside the IIA Report and the draft London Plan.

1.87 The consultation responses on the draft London Plan and this IIA Report will be taken into account during the Examination of the draft London Plan.

Monitoring

1.88 Chapter 8 of the full IIA Report suggests indicators for monitoring the potential sustainability effects of implementing the London Plan. It is then for the GLA to choose an appropriate monitoring framework in light of practical considerations around available resources.

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