January 2014

Integrated Impact Assessment
Further Alterations to the London Plan

Consultation

Published by
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AMEC Environment and Infrastructure UK Limited were commissioned by the Greater London Authority to undertake an independent Integrated Impact Assessment as an iterative process for the Further Alterations to the London Plan. This document constitutes the Sustainability Appraisal/Strategic Environment Assessment, and therefore represents the views of AMEC E&I UK Ltd and not necessarily those of the Greater London Authority or the Mayor of London.

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Non-Technical Summary

This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) Report which documents the assessment of the environmental, social and economic performance of the draft **Further Alterations to the London Plan** (FALP) against a set of sustainability objectives.

The following sections provide an outline of the content of the FALP and the methodology used to assess them. This IIA report has been published alongside the draft FALP for public consultation. For details on how to give your views, please see **Table 1.3** (page 3) in the main report.

1. What are the Further Alterations to the London Plan?

The London Plan is one of the Mayoral strategies which is required under the Greater London Authority Act 1999 (with amendments made by the GLA Act 2007). The London Plan deals with matters of strategic importance to Greater London and Development Plans produced by the London boroughs are required to be 'in general conformity' with it.

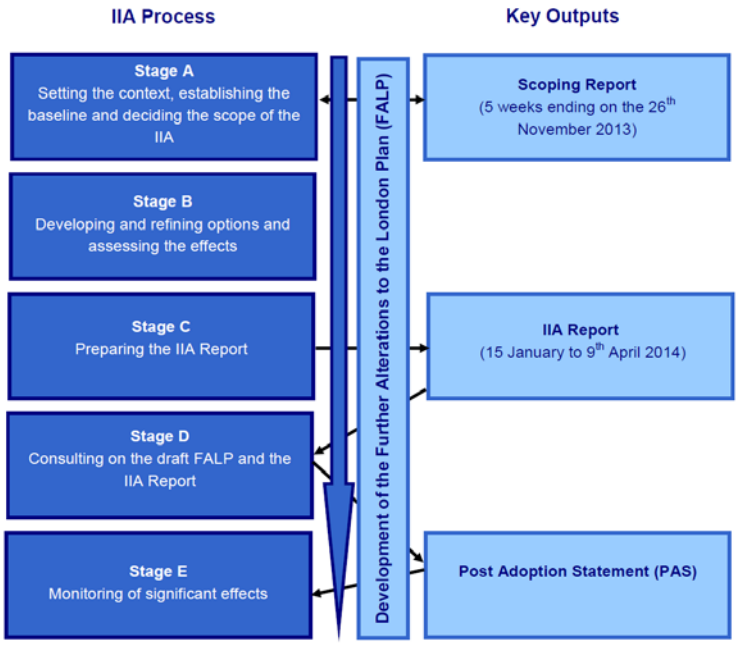
The London Plan is required to be kept under review and following the publication of recent demographics statistics (from the 2011 Census) the Mayor has proposed a set of further alterations. The proposed alterations seek to address housing and employment needs resulting from an increasing population and to continue to support the quality of life of Londoners. The alterations do not comprise a full review of the London Plan 2011, so that not all policy areas will be altered. The FALP will broadly address:

- Population growth;
- Housing;
- Employment space;
- Town centres and retail;
- Opportunity areas;
- Transport;
- Physical infrastructure;
- Social infrastructure;
- Design;
- Noise; and
- Waste capacity.

However, minor changes are proposed to other policies throughout the London Plan 2011, many of which are factual updates or minor clarifications.

2. What is an Integrated Impact Assessment (IIA)?

The IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations). The approach also fulfils the requirements for Health Impact Assessment, Community Safety Impact Assessment and consideration of equalities effects. This integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work.



The adjoining diagram shows an overview of the key stages of the IIA process (which are based on Government guidance on Sustainability Appraisal (ODPM, 2005)). The IIA Scoping Report (that reflected the completion of Stage A) was subject to consultation with the statutory SEA consultees and other stakeholders in October and November 2013. Responses to the Scoping Report have been reflected in this IIA Report. The consultation on this IIA Report is indicated as Stage D in the diagram and follows the iterative assessment of effects and the preparation of this report.

3. How were the Draft Further Alterations to the London Plan Assessed?

The assessment of the draft FALP has been undertaken using an objectives-led approach. The IIA objectives (identified below) have been informed by the baseline evidence, the consideration of the key sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the IIA Scoping Report. They have also built upon objectives identified within previous IIAs of the London Plan. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for an assessment of the key effects of the implementation of the draft FALP.

IIA Objectives
1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.
2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.
3. Health and Well-being. To maximise the health and well-being of the population and reduce inequalities in health.

4. Equalities. To ensure equitable outcomes for all communities, particularly those most at risk to experiencing discrimination, poverty and social exclusion, such as those with protected characteristics. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.
5. Housing. To ensure that all Londoners have access to good quality, well-located housing that is affordable.
6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.
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 minimises unsustainable resource use.
8. Flood Risk and Climate Change Adaptation. To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.
9. Climate Change Mitigation and Energy. To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.
10. Water Quality & Water Resources. To protect and enhance London's waterbodies and the Blue Ribbon Network.
11. Waste. To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.
12. Accessibility and Mobility. To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).
13. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.
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.
15. Open Space. To protect and enhance natural open space in London.
16. Air Quality. To improve London's air quality.

The IIA identifies and assesses those effects arising from the draft FALP. Specifically, the IIA considers the extent to which the FALP (and its alternatives) contribute towards achieving the IIA objectives when considered against the baseline.

4. How were groups of similar policy alterations considered?

There are a number of proposed policy alterations that are very similar and can be grouped together. In this way, the assessment can consider similar policy revisions together. Most of these groupings seek similar outcomes, for example an increase in the delivery of housing. These groups of similar policy alterations include those that:

- Roll the London Plan forward to 2036;
- Increase the focus on housing provision (and density) in town centres and opportunities areas.
- Allow a more 'flexible approach' to be taken with respect to car parking in Outer London; and
- Update the housing targets and include the latest housing supply figures.

Each of these similar policy groups may involve several amendments throughout the London Plan 2011, both to policies and supporting text. For example, increasing the focus on housing provision in town centres and opportunity areas involves revisions to Policies 2.7, 2.15, 3.3 and numerous supporting paragraphs.

There are 20 of these policy groupings and they are presented under 12 different themes (as below):

Housing	Town Centres	Design
Opportunity Areas	Employment	Noise
Delivery of Development	Social Infrastructure	Waste
Transport	Physical Infrastructure	General

Alternatives were developed by the GLA for each of the policy groupings. These alternatives included as a minimum the do-nothing option, for example:

- **Do not** roll the London Plan forward (i.e. retain current projections to 2031);
- **Do not** include the additional focus on housing provision in town centres and opportunity areas;
- **Do not** allow a more "flexible approach" to be taken with respect to car parking in Outer London; and
- **Do not** update the housing target and do not include the latest housing projection figures.

In some instances, the alternatives also include variations on the implementation of the policy, for example, roll the London Plan forward 10 years to 2041.

5. What are the key effects of the draft FALP?

The key outcomes of the draft FALP include an increased focus on housing delivery (including affordable housing), an emphasis on creating employment opportunities through the delivery of new infrastructure and an increased focus on the development of opportunity areas and town centres. Other key outcomes include support for gas and electricity infrastructure and a greater flexibility on car parking in town centres. These are the outcomes that are assessed in this IIA.

Commentary on the sustainability effects of the draft FALP are provided throughout the assessment in Section 4. The following commentary provides a summary of the key effects of the alterations.

London's population has increased by over 80,000pa over the past ten years. This was significantly more than predicted when the London Plan was last reviewed. This increase was driven by a natural population growth and more people deciding to stay in London to raise families. For various reasons, including a downturn in the economy and the housing market, the existing housing targets to increase supply and provide more affordable housing have not been met for a number of years. The proposed alterations seek to address this shortfall as well as future housing

demand. However, given the increase in London's population, and therefore increased housing demand have deviated from historic trends it is considered appropriate to take a precautionary approach to any proposed change in the spatial development of London. To date the London Plan has been reviewed regularly and a future review will identify whether the population growth is due to a structural change or a short term change due to the economic down turn.

The shortage of housing has a range of social, economic and environmental consequences, including on affordability, homelessness, overcrowding and poverty. These issues may affect particular groups disproportionately, for example, older Londoners or those on lower incomes. The London Plan can only provide the policy framework to encourage new housing. The implementation depends on other factors (including the policy framework set by the *draft London Housing Strategy* (November, 2013) and developers' investment considerations). However, the increased emphasis on delivering new housing (especially affordable housing) in the alterations is welcomed. It should help to address the housing shortfall, create employment and regenerate areas.

There are potential adverse effects associated with the provision of new housing. These include increased pressure on existing services (e.g. transport and health care) and facilities (e.g. water resources, energy supply and sewage capacity). There is also increased pressure on green and open spaces. These potential effects are to some extent addressed by:

- **Existing policies in the London Plan:** particularly those policies in Chapter 5 (London's Response to Climate Change) and Chapter 7 (London's Living Places and Spaces). For example, those policies that encourage high quality design (Policy 3.5), sustainable design (Policy 5.3), minimising carbon dioxide emissions (Policy 5.2) and biodiversity and access to nature (Policy 7.19).

- **Proposed further alterations**: for example, those that encourage a step-change in cycling provision to support the growing number of cyclists (Policy 6.9), promote good public transport accessibility, focus development on town centres (Policy 2.15) and Opportunity Areas and encourage investment in new infrastructure (para 4.4A), and

- **Clarifications to existing policies or supporting text**: for example, those that encourage new development to be water efficient and for existing homes and workplaces to become more water efficient (para 5.61).

The assessment of the draft FALP has found the alterations to be broadly positive when considered against the IIA sustainability objectives. Indeed, people that live in cities often use more public transport, live in higher density homes with lower energy consumptions, and have lower car ownership. It follows that if we can manage and accommodate this growth within London, it will contribute towards sustainable development. However, it must be noted that there is a high level of uncertainty associated with the population projections and the Plan should continue to be regularly reviewed and monitored.

Amendments to a Plan must also be subject to HRA to ensure that the Plan remains compliant with the European Habitats Directive and that those amendments do not introduce new or additional impacts, or make otherwise 'not significant' effects on European protected nature conservation sites. Accordingly, the FALP proposed by the

Mayor have been screened for their potential to affect European sites. It was concluded that the FALP do not introduce any potentially significant effects over those identified and mitigated within the 2009 HRA (for the London Plan 2011). Some of the policies will require assessment at a lower tier but appropriate mitigating policies are included within the plan (e.g. Policy 7.19) to ensure that it will have no significant or adverse effects through its implementation.

6. How will any effects be monitored?

A set of 24 key performance indicators (KPIs) are identified in the London Plan 2011 (Table 8.1), these will be monitored by the AMR, published each March. Two key performance indicators are being revised as part of the FALP, they include:

- KPI 4 - Increase the supply of new homes: Average completion of a minimum of 42,000 net additional homes
- KPI 5 – An increased supply of affordable homes: Completion of 16,000 net additional homes per year.

The KPIs are considered appropriate to monitor the effects of the FALP and the IIA has not proposed any additional monitoring.

7. What are the next steps?

This IIA Report is issued for consultation alongside the draft FALP. Consultation will last for 12 weeks from **15th January 2014** to **10th April 2014**. Following receipt of comments on the draft FALP and the IIA Report, an Examination in Public (EIP) will be carried out in autumn 2014. The EIP Inspector will make recommendations to the Mayor. Following consideration of these recommendations, the Mayor will inform the Secretary of State for Communities and Local Government that he intends to publish the new FALP. Following approval from the Secretary of State, the Mayor will submit the 'intend to publish' FALP to the London Assembly for their consideration. The Assembly then has 21 days within which it can reject the alterations by a two thirds majority if it so wishes.

8. How do I provide comments on the IIA?

All responses on the draft FALP and/or the IIA Report must be received by **5pm on Thursday the 10th April 2014**. Details of how to respond are identified in **Section 1.1.3** (page 3).

Contents

1. Introduction

1.1 Integrated Impact Assessment

AMEC Environment and Infrastructure UK Ltd has been appointed to undertake an **Integrated Impact Assessment** (IIA) of the Further Alterations to the London Plan (FALP) by the Greater London Authority (GLA). The Mayor is responsible for keeping the London Plan, which provides the statutory planning framework to guide London's future development under review. The latest London Plan was published in 2011 with minor alterations published in October 2013. These changes are known as the Revised Early Minor Alterations (REMA). The REMA document incorporates the Early Minor Alterations (EMA) to the London Plan which were published for consultation in February 2012[1]. This IIA covers the proposed FALP which address the most pressing matters identified to support London's growth and to enhance Londoner's quality of life.

This IIA Report presents an assessment of the environmental, social and economic performance of the FALP against a set of sustainability objectives. This report follows consultation on a Scoping Report (GLA, 2013)[2] which set out the proposed approach to the IIA. A scoping workshop was held during the consultation period (25th October 2013) to provide consultees with additional information on the scope of the IIA. Comments received during the workshop and following the end of the consultation period were considered and taken into account as part of the approach to this IIA.

The approach employed in the IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and in addition considers health, wellbeing (**Appendix D**), community safety (**Appendix E**) and equality issues (**Appendix C**). This integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work.

1.1.1 The Requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

A Strategic Environmental Assessment (SEA) of plans and programmes that are considered to have significant effects on the environment is required under the European Directive 2001/42/EC ('SEA Directive'). The objective of an SEA, as defined in the Directive is:

> *'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development.'*

[1] http://www.london.gov.uk/priorities/planning/consultations/early-minor-alterations-to-the-london-plan (last accessed 14/11/2013)

[2] Greater London Authority (2013) *Further Alterations to the London Plan Integrated Impact Assessment Scoping Report – The London Plan (Spatial Development Strategy for Greater London).*

The SEA Directive was transposed into UK law in 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004. A Sustainability Appraisal (SA) is required under the Planning and Compulsory Purchase Act 2004 as well as the Strategic Environmental Assessment of Plans and Programmes Regulations 2004. The SA is based on the principles of the SEA but has a wider focus covering key consideration of social and economic sustainability.

The Equality Act 2010 and the GLA Act 1999 (as amended) place an additional duty on the Mayor and GLA to promote equality and equality of opportunity. In addition, the GLA Act 1999 sets out the requirement to reduce health inequalities. Consequently, an analysis of the effects on equality has been undertaken as part of the SA/SEA of the FALP. The Mayor of London and the GLA have the duty to give consideration to community safety under both the Crime and Disorder Act 1998 and the Police and Justice Act 2006. These considerations will be addressed through the preparation of a Community Safety Impact Assessment (CsIA).

Rather than produce many separate reports, all elements have been integrated into this single Integrated Impact Assessment (IIA) which will enable synergies and cross-cutting impacts to be identified as part of an iterative approach to the assessment. This integrated approach has been undertaken for the London Plan and subsequent revisions and alterations, including the REMA.

A Habitats Regulation Assessment (HRA) is required under Regulation 48(1) of the Habitats Regulation 1994, which implements Article 6(3) of the Habitats Directive (92/43/EEC). This report will be prepared separately and will be considered in the wider IIA appraisal process.

1.2 Purpose of Report

The purpose of this IIA Report is to present the findings of the assessment of the draft FALP against a range of social, economic and environmental objectives. This report is structured as follows:

Section 1 **Introduction:** An introduction to the IIA.

Section 2 **Overview of the FALP:** The context of the IIA, including an overview of the FALP.

Section 3 **Methodology:** This section presents the baseline evidence (including the review of plans and programmes) and the objectives used in the IIA. It also provides information on the assessments' assumptions and the Habitats Regulations Assessment.

Section 4 **Assessment:** The assessment of the FALP (including, where relevant the assessment of the reasonable alternatives).

Section 5 **Conclusions and Recommendations:** The key findings of the assessment are presented. A framework for monitoring significant effects is also proposed.

1.3 Consultation and Stakeholder Engagement

Consultation and stakeholder engagement are fundamental to the IIA process and reflect the principle that the development of plans is better where it is transparent, inclusive and uses information that has been subject to public scrutiny. The IIA process aims to ensure that the key stakeholders, those parties who could be affected and the wider public have the opportunity to present their views on the findings of the assessment. At the scoping stage, consultation responses were sought from statutory consultees identified in the SEA regulations, as well as other non-statutory consultees including London First, London Forum, The London Sustainable Development Commission, and Transport for London (TfL).

This IIA Report is now available for public consultation alongside the draft FALP and comments are welcome on this report.

1.3.1 How to give your views on this IIA

This IIA Report is being issued for public consultation alongside the draft FALP. In addition to seeking views from statutory consultees, this IIA Report is available to all organisations/individuals who wish to comment. You can view this document online and download it from www.london.gov.uk.

The consultation period will run for 12 weeks from **15th January** to the **10th April 2014**. All responses on the draft FALP and/or the IIA report must be received by **5pm** on **10th April** and should be sent:

- By email to mayor@london.gov.uk with 'London Plan – FALP' in the email title.
- By post (no stamp required) to:

  Boris Johnson, Mayor of London
  London Plan – Further Alterations to the London Plan
  FREEPOST LON15799
  GLA City Hall, post point 18
  The Queen's Walk
  London
  SE1 2AA

Please note, if you send in a response by email it is not necessary to send 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.

2. Overview of the draft Further Alterations to the London Plan

2.1 Introduction

This section provides an overview of the proposed Further Alterations to the London Plan (FALP). It highlights the need for alterations to the existing London Plan (**Section 2.2**).

2.2 The need for FALP

The Mayor of London is required to produce a spatial development strategy (which is generally known as the London Plan) under the GLA Act (1999). The strategy needs to deal with matters that are of strategic importance to Greater London. The Mayor is required to review the spatial development strategy from time to time and may at any time prepare and publish a new spatial development strategy, or alterations to it.

The Mayor is required to consult on the spatial strategy (known as the London Plan) enabling public participation in its development. The Greater London Authority Act (2007) made amendments to the GLA Act (1999) to ensure that the Mayor has regard to any comments submitted to him in response by the Assembly or any of the functional bodies.

The first London Plan was published in 2004. A full review of the London Plan was published in July 2011. Minor alterations to the London Plan 2011, known as REMA, were published in October 2013 and incorporate EMA which were consulted on in February 2012. However, recently released information from the 2011 Census showed that London's population is larger than had been previously been projected. Consequently, further alterations have been proposed to support the provision of sufficient homes, employment space and infrastructure in response to the revised demographic trends and projections.

2.3 Overview of the draft FALP

The proposed alterations seek to address housing and employment needs resulting from an increasing population and to continue to support the quality of life of Londoners. The alterations do not comprise a full review of the London Plan, so that not all policy areas will be altered. The FALP will broadly address:

- Population growth;
- Housing;
- Employment space;

- Town centres and retail;
- Opportunity areas;
- Transport;
- Physical infrastructure;
- Social infrastructure;
- Design;
- Noise; and
- Waste capacity.

However, other minor changes are proposed to other policies throughout the Plan many of which are factual updates or minor clarifications.

2.3.1 Spatial Development Options

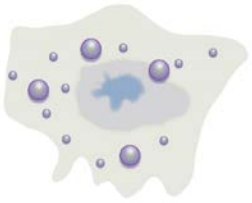
Four spatial options were identified within the Scoping Report (GLA, 2013), these included:

Option 1 The existing spatial development model (set out in the London Plan, 2011) which involves enhancing growth in new Strategic Outer London Development Centres;

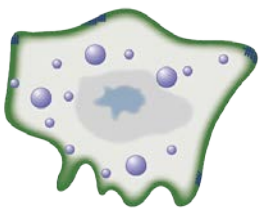
Option 2 Manage strategic release of the Green Belt and/or open land;

Option 3 Growth outside of London; and

Option 4 Enhance the existing spatial development model (set out in the London Plan, 2011) by bringing forward more sites and increasing density based on transport accessibility to accommodate growth within London's boundaries without strategic extensions onto Green Belt and/open land.

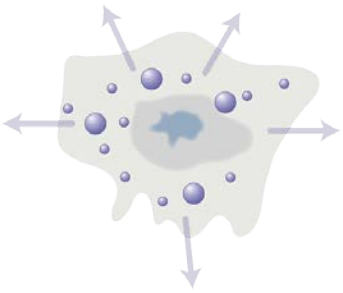


Option 1 represents the spatial development strategy of the Replacement London Plan 2011. It has informed the preparation of the FALP but in its current form cannot accommodate the volume of growth now anticipated. **Option 1 has therefore been rejected by the GLA** because in its current form it cannot accommodate the quantum of forecast growth.

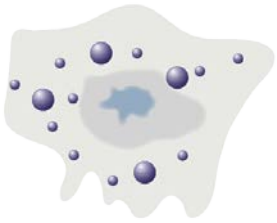


Option 2 involves managing the strategic release of Green Belt and/or open land. However, these changes are unlikely to release sufficient land to represent a strategically significant change to the overall approach taken by the London Plan. Furthermore, there is

uncertainty as to whether the growth pressures will continue over the longer term which would mean release of Green Belt land may have been unnecessary and there are other more sustainable sites still available. **Option 2 has therefore been rejected by the GLA.**



Option 3 assumes some of the growth will be absorbed outside of London. However, this option has been rejected because of uncertainty as to whether recent growth pressures will continue over the long term. Furthermore, this option may be unnecessary due to the existing capacity already in the pipeline in London and the potential to secure more sustainable, further development on existing sites. **Option 3 has therefore been rejected by the GLA.**



Option 4 involves enhancing the existing London Plan (2011) approach to accommodate growth within London's boundaries but without strategic extensions on to the Green Belt or open land.

This option is based on the existing spatial development approach which has been refined to consider:

- a realistic appreciation of the uncertainties associated with the long term growth pressures facing London;
- a rigorous approach to identifying development capacity which is more reflective of the nature of locations;
- a more refined approach to integrating density and public transport accessibility; and
- flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility.

Rather than assuming that the implementation of the density policy should be based simply on the mid-point in the density range for a particular location, option 4 recognises that densities can vary with the variation in public transport accessibility encompassed within that range. This is a more realistic approach than that taken in the 2011 London Plan, and is evidenced by the existing densities that are being delivered. In 2011/12, 40% of all residential units approved were within the density matrix range, 55% were above the range and 5% below the range. For schemes with 15 units or more the percentage of schemes above the density range increases to 60% and those below the density range decreases to 3%.

In addition a review of the housing potential within the Opportunity Areas shows significant potential for additional housing capacity. For example, the potential investment and alterations resulting from Crossrail and HS2 has resulted in the number of homes projected for Park Royal / Old Oak Common / Willesden Junction increasing from 1,500 to 19,000.

This option is also prudent and 'sustainable' insofar as it more closely reflects the realities of implementation of density policy on a case by case basis. In many cases this has yielded developments which are above the density ranges identified generically for particular locations reflecting the opportunities offered by a more refined consideration of the context of sites. The figures for recent years also reflect improvements in quality of accommodation with the implementation of the Mayor's Housing Standards.

Option 4 is the preferred approach resulting in the set of alterations appraised within this report.

2.3.2 Evidence Base and Iterations

The evidence base for the proposed FALP has been developed with input from key stakeholders, including London Boroughs and authorities beyond London's boundaries as part of the Mayor's duty to engage and consult on the spatial strategy.

3. Methodology

3.1 Introduction

This IIA Report provides an assessment of the draft FALP and its contribution towards achieving a range of environmental, economic, health, equality and other sustainability objectives. The approach adopted in this IIA Report is consistent with the requirements of SEA and has been expanded to include a wider range of issues normally found within a SA, as well as those relevant to health, equalities and community safety.

This section sets out the methodology, including the scope of the assessment (**Section 3.2**), the method for collecting and presenting the baseline (**Section 3.3**), the objectives and issues (**Section 3.3 and 3.4**), when the assessment was undertaken and by whom (**Section 3.6**) and assumptions and technical difficulties (**Section 3.7**). Information on the Habitats Regulations Assessment is also provided (**Section 3.8**).

3.2 Scope of the Assessment

3.2.1 Thematic Scope

The thematic topics which have been scoped in to this IIA Report have been informed by the topics identified in Annex I of the SEA Directive. **Table 3.1** highlights how the topics from the SEA Directive relate to the sustainability objectives used within this IIA Report (and previously consulted upon in the Scoping Report).

Table 3.1 Scope of the assessment topics

SEA Directive Topic	Scope in (✓) or out (x)	IIA Sustainability Objective
Biodiversity	✓	2. Biodiversity
Population	✓	3. Health and Well-being; 4. Equalities; 5. Housing; 6. Employment; 7. Stable Economy; 11. Waste; 12. Accessibility and Mobility; 14. Liveability and Place
Human Health	✓	3. Health and Well-being; 4. Equalities; 5. Housing; 14. Liveability and Place
Fauna	✓	2. Biodiversity; 15. Open Space
Flora	✓	2. Biodiversity; 15. Open Space
Soil	✓	2. Biodiversity
Water	✓	2. Biodiversity; 10. Water Quality and Water Resources
Air	✓	16. Air Quality

Climatic Factors	✓	8. Flood Risk and Climate Change Adaptation; 9. Climate Change Mitigation and Energy
Material Assets	✓	1. Regeneration & Land-Use; 5. Housing; 6. Employment; 7. Stable Economy; 9. Climate Change Mitigation and Energy; 11. Waste; 14. Liveability and Place
Cultural Heritage (including architectural and archaeological heritage)	✓	13. Built and Historic Environment; 14. Liveability and Place
Landscape	✓	2. Biodiversity; 13. Built and Historic Environment; 15. Open Space.

The SEA Directive further requires the assessment of the inter-relationship between the issues referred to in **Table 3.1.** The IIA process has been designed to cover wider social and economic issues (economy, society, education, skills, transport, equality and diversity) in addition to those identified in the SEA Directive. As required by the GLA Act 1999 (as amended), the following topics have been covered:

- The effect on the health and health inequality of persons in Greater London;
- Economic development and wealth creation;
- Social development;
- Equality of opportunity;
- The effect of climate change, and the consequences of climate change; and
- The achievement of sustainable development in the UK.

3.2.2 Geographic Scope

In general, this assessment addresses potential impacts from the FALP within Greater London. Where appropriate, impacts beyond the boundaries of Greater London will also be assessed. The key geographic areas within the Greater London boundary are defined by the individual London boroughs depicted in **Figure 3.1**.

Figure 3.1 Greater London and London Boroughs

3.2.3 Temporal Scope

The effects of the policies associated with the London Plan may change over time (in the short, medium and long term) for a number of reasons. The temporal effects of the FALP have been considered in the assessment where relevant. For the purposes of the assessment the timescales may be defined as follows:

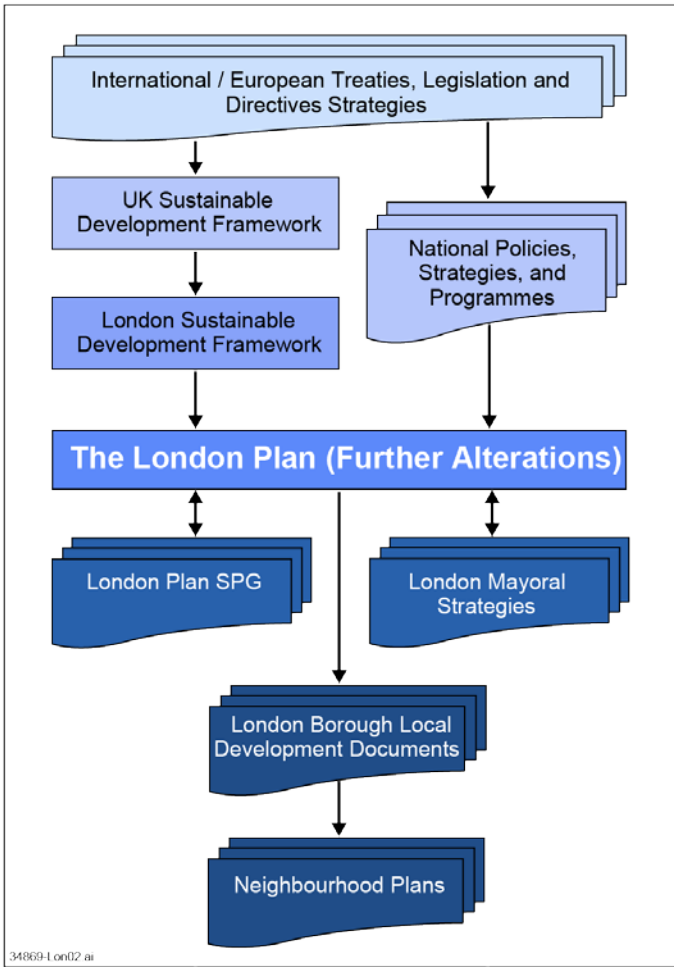
- **Short term**: This may be taken to refer to the effects that occur within the first five years of the implementation of the FALP;
- **Medium term:** This may be taken to refer to the effects occurring between five and 15 years following adoption of the FALP; and
- **Long term:** This may be taken to refer to the effects occurring beyond 15 years and which may arise beyond the FALP's specified lifetime (post 2036).

3.3 Baseline

3.3.1 Review of Plans, Programmes and Strategies

The SEA Directive requires a review of the "*relationship with other relevant plans and programmes*". This aims to set out the relationship between the Plan (i.e. the FALP) and other documents and helps to ensure that any relevant environmental protection and sustainability objectives are recognised. **Figure 3.2** highlights the types of document that influence and are influenced by the FALP.

Figure 3.2 Hierarchy of Plans and Programmes



Relevant documents to the FALP were identified in the Scoping Report. They were categorised by their relevance to the individual chapter themes of the London Plan (London's Places, London's People etc.) and are listed in **Appendix B** of this IIA Report.

The identification and review of plans and programmes has provided a useful source of information to support the environmental, social and economic evidence base.

3.3.2 Baseline Information and Key Issues

An essential part of the IIA process is to identify the current baseline environmental, economic and social conditions and their likely evolution following a 'business as usual' scenario (i.e. without the implementation of FALP). It is only with sufficient knowledge of existing conditions that the key issues may be identified and addressed through the assessment process by providing the context for determining the contribution that FALP may make towards the achievement of the sustainability objectives. The SEA regulations also require that the subsequent effects of the implementation FALP on the baseline are monitored.

Baseline evidence for the following topics (i.e. chapters of the London Plan) was presented for each of the chapters within the Scoping Report:

- London's Places
- London's People
- London's Economy
- London's Response to Climate Change
- London's Transport
- London's Quality of Life (known as 'London's Living Places and Spaces' in the London Plan)

There is a wealth of statics and information on London. This report does not (and could not) aim to present all of this. However, baseline information of particular relevance to the FALP has been included where it helps to inform the assessment of policies.

The key sustainability issues for London (as identified in the IIA of the London Plan 2011) are still relevant for the FALP. Key issues have been updated to reflect any wider policy changes and are listed in **Table 3.2**.

Table 3.2 Key Sustainability Issues for London

Key Sustainability Issues	
A.	**Development and Regeneration.** The sustainable development and regeneration of London, including addressing areas of deprivation and generating a lasting and sustainable legacy from the Olympic Games, particularly for East London communities. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London's housing and employment needs.
B.	**Protecting Biodiversity.** Biodiversity needs to be conserved and enhanced across London (from the central urban core through suburbia to the surrounding green belt) in ways that restore and promote its ecological function.
C.	**Managing Continued Population Growth.** London's population is projected to continue to grow which means new homes, jobs, and infrastructure need to be planned for in a sustainable way.
D.	**Improving and Protecting Health and Well-being.** Poor health outcomes and a widening disparity of relative well-being across London, and the relative impacts on the capacity of Londoners' to engage economically and socially (also see **Appendix D**).
E.	**Equalities.** The increasing disparity in quality of life across social groups and the impact of poverty on access to key social, environmental and economic infrastructure (for example: housing, transport, health care and education). There is also increasing polarisation of certain socio-economic groups within London (also see **Appendix C**).
F.	**Delivering Appropriate Housing.** Affordability, level of provision, quality, sustainable design and location of housing in London, and its impacts on access, mobility, sense of place and resource use.
G.	**The Changing Economy.** London has been impacted by the global recession and financial problems in Europe. London's unemployment rate has risen to over 8%. How London responds and emerges from the recession will have long term impacts on the region and the UK.
H.	**London's World City Status.** The need to ensure London maintains its attractiveness to business and tourism to the benefit of all Londoners.
I.	**Responding to Climate Change**. London's impact on the global climate, and the threat of current and expected climate change on London's population, biodiversity, built and natural environment.

Key Sustainability Issues	
J.	**Protecting Water Quality and Resources.** Population growth, lifestyle choices and climate change are all placing increasing demands on London's water quality and supplies. At the same time existing water resources need to be managed more effectively.
K.	**Managing Waste.** Due to the volume of waste generated and put to landfill there is need for an integrated sustainable approach to managing waste in London, from reduction through to re-use, recycling and reprocessing.
L.	**Increasing Transport Accessibility.** The need to reduce congestion and increase accessibility for all Londoners. There is a continued emphasis on travel by car rather than more sustainable modes of transport such as public transport, walking and cycling. There is also a need to reduce emissions from vehicles (to be addressed in the Mayor's Transport Strategy).
M.	**Safeguarding (and enhancing) Heritage and the Historic Environment.** Due to competing land uses the quality of the cityscape and preservation of the historic environment may come under increasing pressure.
N.	**Promoting Safety and Security.** Levels of crime and perceptions of safety from the perceptions of crime and its relationship to sense of place and community (also see **Appendix E**).
O.	**Improving Access to Nature and Open Space.** There is need to improve the public realm and increase people's opportunity for contact with nature and London's rivers and open spaces.
P.	**Improving Air Quality.** London's air is still polluted and is the worst of any city in the UK and amongst the worst in Europe. The primary cause of poor air quality in London is emissions from road traffic, although emissions from residential and workplace heating are also substantial.

3.4 Sustainability Objectives for the IIA

The establishment of appropriate objectives and indicative *guide questions* is central to the assessment process and provides a way in which the performance and effects of the FALP can be identified and described. Using objectives ensures that each topic area required by the SEA regulations is addressed and provides a framework which guides the assessment in a consistent manner enabling the likely effects of the implementation of FALP to be identified. Using this approach will ensure consistency with the previous IIAs of the London Plan.

This objective-led approach enables the appraisal to identify the extent the further alterations contribute towards each objective, rather than if they will meet prescribed targets. It is therefore more qualitative and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more restrictive at a strategic level.

The sustainability objectives described in this section have evolved over a number of years and have been informed by baseline evidence, the consideration of the key sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the Scoping Report. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for a comprehensive appraisal of the likely effects of the implementation of the FALP by covering the relevant social, economic and environmental aspect.

The *indicative guide questions* have been formulated to provide additional guidance on aspects that could be considered with regards to the likely effects that may occur. They are not designed to be read as targets or aims with which to achieve the objective. Furthermore, a general assumption that underpins the sustainability objectives

is that all existing legal requirements will be met and, as such, statutory compliance has not been reflected individually within the objectives or within the guide questions. The objectives and guide questions are listed in **Table 3.3.**

Table 3.3 Sustainability Objectives and Guide Questions for the IIA

Sustainability Objectives	Guide Questions for the IIA	SEA Topic Requirement
1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.	• 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?	Material Assets
2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.	• 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 management of biodiversity? • Will it improve access to areas of biodiversity interest? • Will it enhance the ecological function and carrying capacity of the green space network? • Will it promote a network of green infrastructure?	Biodiversity, Fauna, Flora, Soil, Water, Landscape
3. Health and Well-being. To maximise the health and well-being of the population and reduce inequalities in health.	• 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? • Will it promote a sense of well-being?	Population, Human Health

4. Equalities. To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.	• 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, in particular address the housing, cultural, social and employment needs of those with protected characteristics? • Will it reduce the level of crime experienced by those with protected characteristics? • Will it promote adequate accessibility, in particular for older or disabled people?	Population, Human Health
5. Housing. To ensure that all Londoners have access to good quality, well-located housing that is affordable.	• Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate social and environmental infrastructure are in place for new residents? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it increase use of sustainable design and construction principles? • Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? • Will it ensure homes are well located in relation to flood risk? • Will it promote the increased supply of housing?	Population, Human Health, Material Assets
6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	• Will it help generate satisfying and rewarding new jobs? • Will it help to provide 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?	Population, Material Assets

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 minimises unsustainable resource use.	• 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 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?	Population, Material Assets,
8. Flood Risk and Climate Change Adaptation. To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.	• Will it protect London from climate change impacts? • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it manage existing flood risks appropriately, including taking opportunities to reduce existing flood risk and avoid new flood risks? • Will it minimise and mange the effects of surface water flooding? • Will it help London function during periods of drought? • Will it help avoid overheating in the built environment? • Will is support social and physical infrastructure to be resilient to climate change impacts? • Will it minimise the health impacts due to the impacts of climate change? • Will it contribute to ensuring an adequate water supply to London, including by using existing water resources efficiently?	Climatic Factors
9. Climate Change Mitigation and Energy. To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.	• Will it help minimise emissions of greenhouse gases? • Will it help London meet its emission targets, including through off-setting existing emissions? • Will it avoid exacerbating the impacts of climate change? • Will it increase the proportion of energy both purchased and generated from renewable and low carbon resources? • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency? • Will it support community energy projects?	Climatic Factors, Material Assets
10. Water Quality & Water Resources. To protect and enhance London's waterbodies and the Blue Ribbon Network.	• Will it improve the quality of waterbodies? • Will it reduce discharges to surface and ground waters? • Will it promote sustainable urban drainage? • Will it improve the water systems infrastructure (e.g. water supply/sewerage)? • Will it reduce abstraction form surface and ground water sources? • Will it reduce water consumption? • Will it help to meet the objectives of the Water Framework Directive?	Water
11. Waste. To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.	• Will it help minimise the production of waste? • Will it help minimise resource use? • Will it promote reuse and recycling (e.g. in the design of buildings and spaces, etc)? • Will it enable the sorting and handling of waste and recyclable products? • Will it help to promote a market for recycled products? • Will it promote recovery from waste?	Population, Material Assets

12. Accessibility and Mobility. To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).	• Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will it help to provide a more integrated transport service from start to finish (i.e. place of residence to point of service use or place of employment)? • Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce road traffic accidents, especially involving cyclists? • Will it improve physical access to the transport system as well as buildings and spaces?	Population
13. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.	• Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential, including their settings? • Will it conserve and enhance the townscape/cityscape character? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it support and enhance heritage? • Will it improve the wider built environment and sense of place? • Will it conserve and enhance local character? • Will it protect important views across London? • Will it protect and enhance public spaces including historic parks and gardens?	Cultural Heritage (including architectural and archaeological heritage), Landscape
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.	• 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?	Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)
15. Open Space. To protect and enhance natural open space in London.	• Will it protect and enhance areas of open space? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? • Will it address areas with deficiencies of access to open space? • Will it promote an appropriate range and type of open space uses? • Will it increase Londoners access for recreation purposes? • Will it promote urban greening? • Will it promote and support the function of the Blue Ribbon Network?	Biodiversity, Flora, Fauna, Landscape

16. Air Quality. To improve London's air quality.	• Will it improve air quality? • Will it reduce exposure to poor air quality? • Will it reduce emissions of greenhouse gases? • Will it help to reduce emissions of PM10 and NO2? • Will it reduce emissions of ozone depleting substances? • Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2010)?	Air

3.5 Completing the Assessment

This IIA has been undertaken using the sustainability objectives identified in **Section 3.4**. In predicting effects, changes are identified in the baseline which would occur as a result of the implementation of the FALP. The cumulative effects of implementing the FALP were also considered. However, due to the strategic and forward-looking nature of the document, quantitative information is not always available to inform the prediction of effects. Where this is the case, the effects have been identified based on professional judgement by experienced technical experts and with consideration to relevant best practice guidance.

3.5.1 Assessment of the Preferred and Alternative Options

There are a number of proposed policy alterations that are very similar and can be grouped together. In this way, the assessment can consider similar policy revisions together. Most of these groupings seek similar outcomes, for example an increase in the delivery of housing. These groups of similar policy alterations include, for example, those that:

- Roll the London Plan forward to 2036;
- Increase the focus on housing provision (and density) in town centres and opportunities areas.
- Allow a more 'flexible approach' to be taken with respect to car parking in Outer London; and
- Update the housing targets and include the latest housing projection figures.

Each of these similar policy groups may involve several amendments throughout the London Plan, both to policies and supporting text. For example, increasing the focus on housing provision in town centres and opportunity areas involves revisions to Policies 2.7, 2.15, 3.3 and numerous supporting paragraphs.

There are 20 of these policy groupings (see **Table 4.1**) and they are presented under 12 different themes (as below):

Housing	Town Centres	Design
Opportunity Areas	Employment	Noise
Delivery of Development	Social Infrastructure	Waste
Transport	Physical Infrastructure	General

Alternatives were developed by the GLA for each of the policy groupings. These alternatives included as a minimum the do-nothing option, for example:

- **Do not** roll the London Plan forward (i.e. retain current projections to 2031);
- **Do not** include the additional focus on housing provision in town centres and opportunity areas;
- **Do not** allow a more "flexible approach" to be taken with respect to car parking in Outer London; and
- **Do not** update the housing target and do not include the latest housing supply figures.

In some instances, the alternatives also include variations on the implementation of the policy, for example, roll the London Plan forward 10 years to 2041.

3.6 Assumptions and Technical Difficulties

It is assumed that all relevant legal requirements will be met as necessary and as such specific reference to the compliance with statutory limits and targets has not been made in the assessment or the sustainability objectives.

3.7 Habitats Regulations Assessment

Regulation 102 of the *Conservation of Habitats and Species Regulations* 2010 (as amended) (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either on its own or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity. The London Plan was originally subject to HRA in 2009, which concluded that the plan would have no significant effects on any European sites due to the provision of appropriate protective policies and mitigation.

Amendments to a plan must also be subject to HRA to ensure that the plan remains compliant and that those amendments do not introduce new or additional impacts, or make otherwise 'not significant' effects 'significant'. Accordingly, the FALP proposed by the Mayor have been screened for their potential to affect European sites, using the same approach used for the 2009 HRA, as agreed with Natural England. The screening of the amendments is reported separately but in summary the FALP do not introduce any potentially significant effects over those identified and mitigated within the 2009 HRA. Some of the policies will require assessment at a lower tier (as before) but appropriate mitigating policies are included within the plan (e.g. Policy 7.19) to ensure that it will have no significant or adverse effects through its implementation.

4. Assessment of Effects

This chapter sets out the assessment of the effects of the FALP. The assessment has been presented under the themes (as identified in **Table 4.1)** and the scoring system identified in **Table 4.2**.

Table 4.1 Themes identified in the appraisal

Themes identified for appraisal	Relevant Policies
General	
• Roll the London Plan forward to 2036.	1.1 A, 4.5 A
Housing	
• Update the housing targets and include the latest housing supply figures.	3.3, 3.8, 3.10, 3.11
• Increase the focus on housing provision (and density) in town centres and opportunities areas.	2.7, 2.13, 3.3, 3.7, 3.18
• Ensure appropriate housing provision is made for custom build homes and within the private rented sector (PRS).	3.8
Opportunity Areas	
• Include reference to the London Legacy Development Corporation and its planning powers.	2.4 C
Delivery of Development	
• Reference detailed polices for Central Activities Zone (CAZ) and the use of Mayor Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF).	2.11, 8.1
Transport	
• Allow a more 'flexible approach' to be taken with respect to car parking in Outer London.	2.8, 6.13
Town Centres	
• Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing.	2.4, 2.7, 2.15, 4.7, 4.8
• Reflect the status and function of town centres, including Stratford.	2.4, 2.15, 4.7
Employment	
• Ensure employment/workspace meets the needs of emerging sectors of the economy.	2.9, 4.3, 4.10
Social Infrastructure	
• Strengthen and clarify the approach to specific types of infrastructure, e.g. local community assets, and open spaces.	2.18, 3.18, 4.8, 7.13, 7.18, 7.23, 8.2
Physical Infrastructure	
• Maximise the benefits from new infrastructure to secure sustainable growth and development.	4.1
• Support the development and delivery of infrastructure, in particular gas and electricity infrastructure	5.4A, 8.1
• Include reference to the Royal Docks, its unique size and potential for regeneration.	7.30
• Reflect the current delivery programme for cycle infrastructure	6.9

Themes identified for appraisal	Relevant Policies
Design	
• Include reference to policy considerations for design, including lifetime neighbourhoods, designing out crime, local character, public realm, safety and security.	7.1, 7.3, 7.5
Noise	
• Include reference to Explanatory Note to the Noise Policy Statement for England.	7.15
Waste	
• Include CO_2 performance criterion.	5.17
• Update the waste projections.	5.17
• Bring the waste target dates forward by 5 years.	5.16

Table 4.2 Scoring System used in IIA

Score	Symbol	
Major positive effect	**++**	The alterations contribute **significantly** to the achievement of the objective
Minor positive effect	**-**	The alterations contribute to the achievement of the objective, but not significantly
No effects	**0**	The alterations do not have any effect on the achievement of the objective
Minor negative effect	**-**	The alterations detract from the achievement of the objective, but not significantly
Major negative effect	**- -**	The alterations detract **significantly** from the achievement of the objective
Uncertain effect	**?**	The alterations have an uncertain effect on the achievement of the objective
Note: Effects may be scored as uncertain if there is insufficient information available to determine a score. Some policies may also have both positive and negative effects on the objective, and where this is the case an explanation is provided.		

4.1 General

4.1.1 Background

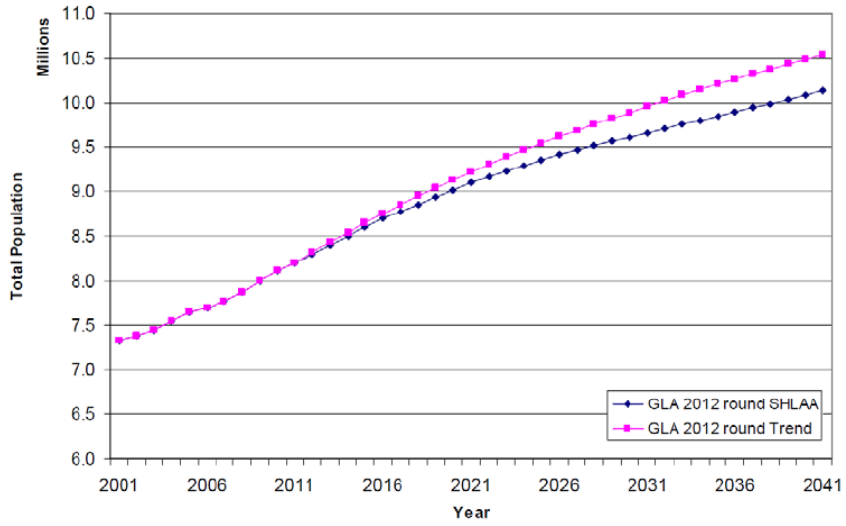
Recently released data from the 2011 Census showed that London's population has increased at a substantially higher rate than anticipated in the London Plan 2011 and REMA. The average population growth rate over the past ten years was 86,000 pa, rather than 51,000 pa as previously assumed. London's population on Census day (27 March 2011) was 8.2 million, approximately 0.6 million above the anticipated figure. This increase of 12 % since 2001 is above the average increase of 7 % across the whole of England and Wales. The capital is the fastest growing region across England and Wales with increasing populations in most Boroughs, with the exception of

Kensington and Chelsea. Population growth is an important consideration for the London Plan and its subsequent alterations and has major influence on policy development.

To refine the Department for Communities and Local Government's (DCLG) population projections, the GLA has produced both a Strategic Housing Land Availability Assessment (SHLAA) and trend based projections of the population growth. The SHLAA projections take into account development trajectories and therefore limit population growth, whilst the trend based projections are unconstrained. London's population is projected to rise between 9.56 million (SHLAA) and 9.9 million (trend based) by 2031 (**Figure 4.1**)[3]. This represents a yearly growth of approximately 83,000 people per year.

The population growth identified by the 2011 Census was significant. However, it is considered that the Census may have been taken just after the height of population growth in London and just before the economy begins to recover more strongly. Furthermore, recent fluctuations and trends are likely to have been influenced by the relaxation on European immigration and the effects of the recession on the housing market in both London and areas where Londoners have traditionally moved to and it is unclear how Londoners will react to the recovering housing market. Whilst it is acknowledged that the population will continue to grow due to natural increase, it is considered that internal migration may return to its historic pattern. This could have significant implications for the DCLG population household projections. The GLA acknowledges the considerable uncertainty over the long term trend in population and housing projections.

Figure 4.1 Total Population of Greater London (2001-2041)



Source: GLA 2012 round projections.

In addition, London's older population is increasing in number and proportion, and it is uncertain how this ageing population will act, with regards to their housing choice, once retired. These uncertainties consequently affect

[3] GLA Intelligence (2013) GLA 2012 Round Population Projections: Intelligence Update 05-2-13 – February 2013

population and household projections. However, the GLA has the duty to keep the London Plan under review and it is likely that further amendments will be made as new population data becomes available, if required. The GLA produces annual population projections based on the most up-to-date data available.

Policy Change: Roll the London Plan forward to 2036.

The proposed change would roll the London Plan 2011 forward to 2036 (preferred option). The London Plan 2011 would not be rolled forward under alternative A whilst alternative option B would extend the London Plan to 2041 or 2046. The assessment of this proposed policy alteration and its alternatives, only considers changes to the time period of the London Plan. It is not likely that changing the time period of the London Plan will have a direct effect on any of the objectives as the change would not alter the direction of the policies. The preferred option has been chosen as it encompasses a 20 year planning period which is identified as best practice in the emerging London Planning Statement SPG[4]. **Table 4.3** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 1.1 A – Delivering the Strategic Vision and Objectives for London
Policy 4.5 A – London's Visitor Infrastructure

Table 4.3 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
Roll the London Plan forward to 2036.	Do not roll the London Plan forward, i.e. retain projections to 2031.	Roll the London Plan forward further 20/25 years to 2041/2046.
1. Regeneration and Land Use		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
2. Biodiversity		
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3.Health and Well-being		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
4. Equalities		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

[4] Mayor of London (2012) *London Planning Statement: Draft Supplementary Planning Guidance.*

5. Housing		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

4.2 Housing

4.2.1 Background

The number of households in London has risen by 8.3% since 2001. The Census 2011 showed that there were a total of 3.27 million households. Whilst the London Plan 2011 and REMA assumed an average household size of 2.19 people per household, the Census also showed that the average household size in London has increased from 2.36 to 2.57 people per household over the past ten years. The number of households has been projected to increase to 3.94 million by 2031. This projection is based on work being carried out for the revised Strategic Housing Market Assessment (SHMA) and DCLG's 2011 household characteristics. Projections without the constraints of housing delivery and cost predict a total of 4.13 million households.

Moreover, the most recent GLA population projections anticipate a significantly higher level of growth among over 65 year olds (23,000 pa) than that in the 2011 London Plan (13,000 pa). It is expected that this will increase the most recent estimate of specialist housing requirements (2,000 – 2,350 dwellings pa) which did not take full account of the implications of the 2011 Census.

Overcrowding was greatest in households whose head had a Bangladeshi (35.8% of households), African (27% of households), Pakistani (25.5% of households) ethnicity and in Gypsy and Irish Traveller households (20.5% of households). However, the majority of households, in all ethnic groups, lived in accommodation that was neither overcrowded nor under-occupied.

The number of private rented housing has increased whilst the number of social rented housing has decreased so that a greater proportion of households were privately rented (26.4%) than were socially rented (24.1%). The majority of households were owner occupied (49.5 %). The ethnicities with the highest percentage of households in socially rented accommodation are Black Other (52%), Mixed White & Black Caribbean (50%) and Bangladeshi (48.5%).

Policy Change: Update the housing targets and include the latest housing supply figures.

The National Planning Policy Framework (NPPF) and the draft National Planning Policy Guidance (NPPG) set out considerations for the planning for adequate housing. These place significant weight on meeting housing demand, including affordable housing. The delivery of affordable housing in London is subject to a number of factors, including the borrowing powers of affordable housing providers, funding from Government and the viability of market housing as affordable housing is required where major housing schemes are proposed. The aim of including a revised housing target is to encourage the delivery of affordable housing through the planning system and to enable monitoring against this target. The aims of the alterations are to maximise the delivery of affordable housing and to ensure that intermediate housing in particular does not remain vacant for extended periods.

Whilst not a target, the benchmarks for housing for older people send a clear signal that this form of housing is a priority for the Mayor and is aimed at encouraging increased delivery of this form of housing across London.

The proposed change would update the housing target from 32,210 to 42,000 net additional homes per year within Chapter 3 (London's People) and Chapter 8 (Implementation, Monitoring and Review) of the London Plan 2011. The targets for affordable housing and benchmark numbers for the provision of housing for older people would also be updated under the preferred option. Furthermore, the Mayor will address the need for student housing to free up the occupancy of family dwellings. The alternative option would not update the housing targets or make reference to housing for specialist housing needs. **Table 4.4** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 3.3 – Housing
Policy 3.8 – Housing Choice
Policy 3.10 – Affordable Housing
Policy 3.11 – Affordable Housing Targets

Table 4.4 Assessment of preferred and alternative options

Preferred option	Alternative option
Update housing targets, including targets for affordable housing and benchmarks for housing for the older people.	Do not update housing targets.
1. Regeneration and Land Use	
Updating the housing targets, including targets for affordable and specialist housing, is likely to support the provision of sufficient land for the delivery of housing. Policies in the London Plan (e.g. 2.13 and 2.14) support growth in regeneration areas. Consequently, the proposed alteration is likely to promote regeneration. Providing flexibility in the eligibility criteria for intermediate housing will help reduce the potential for properties to remain vacant and thus support the efficient use of land. **Minor positive effect.**	Housing targets would not be updated and would reflect inaccurate statistics. No additional land for housing would be identified through this approach. This would consequently limit the potential for growth and regeneration. **Minor negative effect.**
2. Biodiversity	
Updating the housing targets is likely to result in additional land having to be identified for the provision of housing. It is possible that this would result in additional pressure being placed on biodiversity, for example by reducing available habitats or through disturbance. However, other policies of the London Plan such as policies 5.3C (i) and 7.19 are aimed at the mitigation of adverse effects on biodiversity. This is further supported through various documents such as Biodiversity Action Plans[5]. It is uncertain to which extend biodiversity will be affected through this policy change as it is likely that this will vary greatly depending on site conditions, mitigation measures, etc. **Uncertain effect.**	**No effects** are anticipated on the objective from this option.
3. Health and Well-being	
This approach is likely to support the objective by supporting the provision of specialist housing, such as dwellings for older people which will take the requirements of an ageing population into account.	This approach is less likely to support the provision of housing which takes the needs of different groups into account. As a consequence it is likely that certain groups may not live in an environment which

[5] City of London (2003) Biodiversity Action Plan 2010-2015.

Preferred option	Alternative option
This is likely to support health and well-being of these residents. **Minor positive effect.**	suits their needs and supports their health and well-being. **Minor negative effect.**
4. Equalities	
Updating housing projections and targets would support the delivery of sufficient housing and may help stabilise housing prices, supporting equal opportunities throughout communities. Furthermore, the provision of housing, including maximising the delivery of affordable housing would be in line with other policies of the Plan (e.g. Policy 3.5), ensuring that the needs of different groups are taken into account in the housing design. This approach is likely to reduce inequalities by addressing special needs, such as the needs of older people, through the provision of adequate housing. **Minor positive effect.**	This approach could have adverse effects on the objective if supply is not encouraged through new targets and if as a consequence, house prices rise higher than they would have done if new targets were proposed. Moreover, not including the updated higher affordable housing targets or the housing for older people benchmarks is less likely to highlight the increasing demand for this form of housing required to meet the needs of those on lower incomes (including those ethnic groups most likely to need social and affordable housing), as well as of older people. **Minor negative effect.**
5. Housing	
This approach could support the provision of land for housing. Updating the housing targets is likely to maximise the delivery of housing in London and would have beneficial effects on the objective. Due to the high number of houses which will be required to meet the substantial increase in population this effect has been assessed as significant. This approach has potential to deliver housing for older people, freeing up occupied family housing. Furthermore, the Mayor will support proactive partnerships which support the provision of student housing. It is likely that family dwellings would be freed up as a consequence. Providing flexibility in the eligibility criteria for intermediate housing will help reduce the potential for properties to remain vacant. **Major positive effect.**	Not updating housing and housing monitoring targets is likely to result in a significant shortage of appropriate housing. This approach is less likely to result in London's housing needs, including affordable housing being met. . Not providing some flexibility in the eligibility criteria for intermediate housing could result in much needed housing remaining vacant. **Major negative effect.**
6. Employment	
Updating the housing targets is likely to generate additional construction jobs as well as associated employment opportunities (e.g. finance, legal, retail). Although a large proportion of these jobs are likely to be temporary, construction can support training opportunities and provide people with skills for further employment in line with the wider London Plan policies (e.g. Policy 4.12). **Minor positive effect.**	This approach would not generated additional employment or training opportunities. The option would have no effect on the objective. **No effects.**
7. Stable Economy	
Updating the housing targets is likely to result in additional land being identified for the provision of housing. This is likely to reassure and attract investors, stimulating investment in the economy, particularly but not limited to the housing sector. **Minor positive effect.**	Keeping current targets is likely to result in a housing shortage which could increase the overall cost of housing. Subsequently this could have negative impacts on the economy as housing costs become disproportionate to incomes. Sudden pressure to deliver housing could result in poorly planned loss of other land uses, which could create uncertainty of land values as other land uses compete with housing land value and could be detrimental to the wider economy. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	

Preferred option	Alternative option
The provision of additional housing is likely to increase the demand for energy and may exacerbate green house gas emissions. However, it must be noted that the existing and proposed London Plan policies are aimed at mitigating effects from the provision of housing. Consequently, it has been assumed that there would be no notable effect on the objective. **No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources	
The provision of additional housing is likely to put additional pressure on water resources as well as on maintaining/improving current water quality. It is likely that London will be faced with increased amounts of waste water treatment. It must however be noted that the existing and proposed London Plan policies are aimed at mitigation effects from the provision of housing and that it consequently has been assessed that the proposed approach would not have an effect on the objective. **No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
It is likely that an increased population and the associated provision of additional housing will result in larger amounts of waste being generated. Existing and proposed policies of the London Plan seek to mitigate these effects. Therefore, it is likely that the proposed policy change would not have an effect on the objective. **No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
The delivery of housing schemes generally supports and stimulates investment for social and physical infrastructure for the provision of key services, recreation and leisure. Creating sufficient housing opportunities and housing choice has potential to promote mixed and inclusive communities. However, it is possible that additional pressure could be placed on existing facilities through the provision of further housing in already densely populated areas. **Minor positive effect/minor negative effect.**	Keeping current housing targets is likely to result in a housing shortage. Additional pressure could be put on existing social and physical infrastructure which could have adverse effects on open spaces, available cultural, leisure and recreational activities as well as key services and facilities. The quality of life in communities which could become increasingly crowded could be adversely affected. Moreover, not including the updated higher affordable housing target is less likely to highlight the increasing demand for this form of housing and to support mixed and balanced communities. **Minor negative effect.**
15. Open Space	
The London Plan requires the provision of public, communal and open space to be taken into account in the design of all new housing developments (e.g. Policy 3.5)**.** Consequently, identifying additional land for housing is likely to be beneficial on the provision of open space. It is important that the allocation of land for housing is well planned to ensure that development in the Green Belt and on open spaces is avoided. However, it is likely that more land will be required for the delivery of housing as a consequence of this alternative. The uncertainties associated with the projections could however result in premature allocation of land for unneeded housing and could result in the development of open space or sites on the Green Belt.	This approach would not result in additional land being allocated for the provision of housing at an early stage. Local authorities could find themselves under increased pressure for the delivery of housing which may result in the unplanned loss of open space or land on the Green Belt. **Minor negative effect.**

Preferred option	Alternative option
Minor positive effect/minor negative effect.	
16. Air Quality	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option is likely to have positive effects on several objectives by enabling planning to consider the increased need for housing from a growing population. It is likely that this option will have significant benefits on the provision of housing, including the provision of affordable housing and housing for older people. The alternative option would keep current projections and targets and may result in a substantial shortage of housing. As population figures are uncertain, particularly in the long term, review and monitoring is recommended to ensure the appropriate amount of land has been allocated for housing.

The provision of additional housing generally increases the demand for energy, water and other resources and puts additional pressure on the treatment of waste and waste water. However, existing and proposed policies of the London Plan seek to minimise these effects. Therefore, the effects of the preferred option on the objectives 'Climate Change Mitigation and Energy', 'Water Quality and Water Resources' as well as 'Waste' have been assessed as neutral under the assumptions that adverse effects can be efficiently mitigated through other policies.

Policy Change: Increase the focus on housing provision (and densities), especially in town centres and opportunity areas.

The proposed change would place additional focus for housing development in town centres and opportunity areas (preferred option) and encourage the co-location of schools and housing developments to maximise land use. The alternative option A would not put additional focus on the development of housing in town centres and opportunity areas (the do-nothing option), whilst option B would include reference to either town centres or opportunities areas. **Table 4.5** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.7 – Outer London: Economy
Policy 2.13 – Opportunity Areas and Intensification Areas and Annex 1
Policy 2.15 – Town Centres
Policy 3.3 – Housing
Policy 3.7 – Large Residential Developments
Policy 3.18 – Educational Facilities

Table 4.5 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
Increase focus for housing provision (and	Do not increase focus for housing provision	Only include reference to either town centres

Preferred option	Alternative option A	Alternative option B
densities) in town centres and opportunity areas.	(and densities) in town centres and opportunity areas.	or opportunity areas.
1. Regeneration and Land Use		
This approach is likely to support the regeneration of struggling town centres by introducing additional population which can support local shops and services. Encouraging development proposals that co-locate schools and housing will benefit regeneration and efficient use of land. **Minor positive effect.**	Not including reference to town centres and opportunity areas would not put additional focus on the development of these areas. However, other policies of the London Plan (e.g. Policies 2.13 and 2.15) along with documents such as the *Opportunity Area Planning Frameworks (OAPFs)*[6] support development in town centres, opportunity and intensification areas. Consequently, it is unlikely that this option would have an effect on the objective. **No effects.**	Including reference to town centres or opportunity areas would only place focus on the development of one of these categories. However, the development is still likely to be focused in both areas as this is referenced through other policies of the plan and further planning documents. **Minor positive effect.**
2. Biodiversity		
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3.Health and Well-being		
Town centres and opportunity areas usually are well connected through public transport and offer a wide range of services and facilities. These central locations can be beneficial for residents as they are more likely to use sustainable transport, including walking and cycling, and by improving access to facilities such as doctors and clinics. This could as a consequence promote a more active lifestyle. Furthermore, it is possible that additional facilities would be provided to cover an increased number of residents. **Minor positive effect.**	This approach would not support the struggling town centres and opportunity areas and could result in new residents needing to travel further to services and facilities. However, development in these areas is promoted through the wider London Plan and planning documents. Consequently, no adverse effects are anticipated on the objective. **No effects.**	Including reference to town centres or opportunity areas would only result in benefits for one of these areas. However, the shortcomings of this approach would be covered through other policies of the London Plan. **Minor positive effect.**
4. Equalities		
Placing additional focus on town centres and opportunity areas may encourage investment in social and physical infrastructure which could reduce inequalities in the area and promote integrated communities. Furthermore, this approach would reduce inequalities for residents who are less able to travel, such as older people, disabled people and children, as services and facilities would be more accessible. **Minor positive effect.**	**No effects** are anticipated on the objective from this option.	This approach would be beneficial to either town centres or opportunity areas. However, the shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Minor positive effect.**
5. Housing		
Town centres and regeneration areas are	Not putting additional focus on town centres	This approach would be beneficial to either

[6] Mayor of London (2011) Opportunity Area Planning Frameworks.

Preferred option	Alternative option A	Alternative option B
generally well connected to public transport and have a number of services and facilities. Focusing housing development in this area is likely to have beneficial effects on the objective by ensuring that appropriate infrastructure is in place for new residents. Furthermore, it is likely that this approach would enhance the amenity value as it is likely that investment in the area would be stimulated. Opportunity areas in London have the capacity to provide approximately 300,000 houses and could make a significant contribution in the delivery of sufficient housing. Encouraging development proposals that co-locate schools and housing may also help to bring forward more housing development. **Significant positive effect.**	and regeneration areas could result in development of areas where less infrastructure is already in place to meet housing requirements. However, as the wider London Plan and further planning documents support development in town centres and opportunity areas it is not likely that this approach would have adverse effects on the objective. **No effect.**	town centres or opportunity areas. However, the shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Minor positive effect.**
6. Employment		
This approach is likely to have beneficial effects on the objective as it promotes the provision of housing in areas which are generally well connected to public transport, making employment more accessible. Furthermore, it is likely that the introduction of additional residents may stimulate investment, creating additional jobs. **Significant positive effect.**	**No effects** on the objective are anticipated from this option.	This approach would be beneficial to either town centres or opportunity areas. However, the shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Minor positive effect.**
7. Stable Economy		
This approach is likely to attract investment into struggling town centres and regeneration areas which could have localised beneficial effects. Furthermore, it is likely that the efficient use of land will support the wider economy. **Minor positive effect.**	**No effects** on the objective are anticipated from this option.	This approach would be beneficial to either town centres or opportunity areas. However, the shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Minor positive effect.**
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
Focusing growth in areas that are well connected to public transport and provide services and facilities in the vicinity is likely to support the use of sustainable transport, including public transport, walking and cycling. This would help London to meet its greenhouse gas emission targets and support the objective. **Minor positive effect.**	**No effects** on the objective are anticipated from this option.	Focusing growth in areas that are well connected to public transport and provide services and facilities in the vicinity are likely to support the use of sustainable transport, including public transport, walking and cycling. This help support London to meet its greenhouse gas emission targets and support the objective. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
This approach is likely to have beneficial effects on the objective as town centres and opportunity areas are generally compact and well serviced with public transport. Residents would be living in a location where minimal travel is required to reach shops and services. This option could alleviate the demand for developing less sustainable locations, placing less pressure on the transport network. **Minor positive effect.**	This approach could result in the development of less sustainable locations which may require residents to travel further to reach shops and services and could place additional pressure on the transport network. However, the wider London Plan and further planning documents promote the development of town centres and opportunity areas so that no effects are anticipated from this approach. **No effect.**	This approach would be beneficial to either town centres or opportunity areas. However, the shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Minor positive effect.**
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space		
Opportunity areas are a reservoir of brownfield sites and have a significant capacity of accommodating new developments. The OAPFs identifies 37 opportunity areas with a total capacity to accommodate approximately 566,000 jobs and 300,000 homes. The provision of housing within town centres is also likely to make use of brownfield sites. This approach would significantly alleviate the demand for development in less sustainable locations including the Green Belt and open spaces. **Major positive effect.**	**No effects** on the objective are anticipated from this option.	This approach is likely to have significant positive effects on the objective as it promotes the use of brownfield sites, either within opportunity areas or town centres. The shortcomings of this approach would be covered through other policies of the Plan and additional planning documents. **Major positive effect.**
16. Air Quality		
This approach would promote housing development in town centres and opportunity areas which are generally compact and well services with public transport. This is likely to minimise the need for travel and to support the use of sustainable transport methods such as public transport, walking and cycling,	**No effects** on the objective are anticipated from this option.	This approach would promote housing development in town centres or opportunity areas which are generally compact and well services with public transport. This is likely to minimise the need for travel and to support the use of sustainable transport methods such as public transport, walking and cycling,

Preferred option	Alternative option A	Alternative option B
consequently reducing emissions of greenhouse gases and other pollutants. **Minor positive effect.**		consequently reducing emissions of greenhouse gases and other pollutants. **Minor positive effect.**

The preferred option would place an additional focus for housing development in town centres and opportunity areas. This would potentially have significant benefits for the efficient use of land, as 37 opportunity areas have been identified in the draft FALP, an increase of four since the Opportunity Area Planning Frameworks (OAPFs) was published. The opportunity areas of London have capacity for the provision of approximately 300,000 homes and could accommodate up to 566,000 jobs. This approach would make use of previously developed land and would reduce the need for development in less sustainable areas, particularly the Green Belt and open spaces. Alternative option B is likely to have similar effects on the objectives as the preferred approach. It would only make reference to either focusing development in town centres or opportunity areas. However, it has been assumed that the shortcomings of this approach would be compensated through other policies of the London Plan and additional planning documents such as the OAPFs. No changes to the current policy would be made under option A. Consequently, no additional focus would be placed on the development of town centres or opportunity areas. For the purpose of this assessment it has been assumed that other policies of the London Plan and further planning documents would encourage development in these areas. This approach would therefore not have an effect on the objectives.

Policy Change: Ensure appropriate provision is made for custom build homes and within the private rented sector (PRS).

The proposed change would ensure that appropriate housing provision is made for custom build housing and the PRS to '*sustain the contribution ... in addressing housing needs and increasing housing delivery*' (preferred option). This alteration, along with the supporting text, would remove uncertainty between the London Plan 2011 and the National Planning Policy Framework (NPPF) and ensure that the London Plan meets the requirements of the NPPF. Furthermore, the proposed changes would address the housing needs outlined in the NPPF and the draft National Planning Policy Guidance (NPPG), such as the delivery of a wide choice of quality homes and increased opportunities for home ownership (para. 50, NPPF). The alternative options would not refer to specific housing groups/types (option A), refer to custom build housing (option B) and refer to the PRS (option C). **Table** 4.6 shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

In 2012 the Mayor published '*Build your own home – the London way*' a funding prospectus setting out how organisations can bid for £8 million of funding. The funding is split between £5 million of repayable development finance for Custom Build Housing and £3 million of revenue grant funding to support Community Right to Build. The funding prospectus describes in detail ways in which the funding can be used and how organisations can apply for it.

The government has launched a £1 million build-to-rent fund providing equity to house builders and developers, initiated a £3.5 billion debt guarantee scheme to support new private rented development, and established a task force to support PRS schemes.

Policies to be altered: Policy 3.8 – Housing Choice

Table 4.6 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B	Alternative option C
Refer to additional specific groups/housing types that should be considered when planning for housing need.	Do not refer to additional specific groups/types of housing.	Only refer to custom build housing.	Only refer to the private rented sector.
1. Regeneration and Land Use			
This approach highlights the support given to the PRS by the planning system and ensures that appropriate provision is made for the accommodation of custom build housing. The policy change is likely to promote regeneration, primarily by encouraging investment in the PRS. **Minor positive effect.**	The Mayor and boroughs will still need to plan for the housing needs of those who want to build their own homes and the PRS as the policy is contained in the NPPF and the draft NPPG. However, without inclusion of the reference in the London Plan boroughs may not give this issue priority. This could limit any encouragement to improve the potential for custom build housing and the PRS. Not maximising housing delivery is likely to limit regeneration opportunities. **Minor negative effect.**	Without reference to the PRS the Mayor and boroughs will still need to plan for this housing sector as this approach is contained in the draft NPPG. But without its inclusion in the London Plan boroughs may not give this issue a priority. This could limit any encouragement to consider the PRS as part of overall housing need and limit regeneration. **Minor negative effect.**	This approach is less likely to support custom build housing. However, this sector is not likely to make a large contribution to regeneration. Reference to the PRS could support regeneration. **Minor positive effect.**
2. Biodiversity			
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3.Health and Well-being			
This approach is likely to have positive effects on the objective through the provision of housing to meet the needs of different groups. This is likely to promote health and well-being. **Minor positive effect.**	This approach could limit the potential delivery of housing. It is likely that this will result in less housing which meets special housing needs, which may be of particular importance when regarded in the light of an increasingly ageing population. **Minor negative effect.**	Not making reference to the PRS could limit the amount of housing which could be provided through this sector and may result in less available housing to meet the needs of special groups. It is not likely that the contribution from custom build housing will have an effect on the objective through a significant delivery of housing. However, supporting this sector could have some beneficial effects on the objective by allowing those who want to build their own home to consider their own current and future needs. **Minor negative effect/minor positive effect.**	Supporting the PRS is likely to encourage the provision of housing and could result in more allotments being created which meet the needs of special groups, such as older people. This is likely to promote health and well-being. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B	Alternative option C
4. Equalities			
This approach is likely to ensure that the housing needs of those who want to build their own home and the PRS are identified by the boroughs. This could reduce inequalities by making housing more available. Moreover, the PRS could support the housing needs of various groups. **Minor positive effect.**	This approach could limit the additional delivery of housing and could result in increased housing prices. Further, this approach would not support custom build housing. **Minor negative effect.**	Not making reference to the PRS could limit the availability of housing and could result in increased cost for housing, which is likely to increase inequalities. This approach would still support custom build housing. **Minor negative/minor positive effect.**	This approach is less likely to support custom build housing but could reduce inequalities by promoting housing delivery. **Minor negative/minor positive effect.**
5. Housing			
This approach is likely to ensure that the housing needs of those who want to build their own home and the PRS are identified. These groups could take advantage of the Government's and the Mayor's programmes to deliver this type of housing. Custom build housing is unlikely to deliver significantly more housing, but any support for the PRS would be aimed at increasing the overall housing supply in London. **Minor positive effect/Minor negative effect.**	Without this reference the Mayor and boroughs will still need to plan for the housing needs of those that want to build their own home and the PRS as the policy is contained in the NPPF and the draft NPPG. However, without its inclusion in the London Plan boroughs may set other priorities for the delivery of housing, limiting the abilities to take advantage of any Government and Mayoral programmes to support this type of housing. **Minor negative effect.**	Without reference to the PRS the Mayor and boroughs will still need to plan for this sector as this approach is contained in the draft NPPG. However, without its inclusion in the London Plan boroughs may not give this issue priority. This could limit encouragement to consider the increase in housing that could be delivered by the PRS to help meet the overall demand for housing in London. The reference to custom build housing is beneficial as it is likely to ensure it is considered by the boroughs. However, this form of development is unlikely to deliver significant amounts of housing in London. **Minor negative effect.**	Without reference to the custom build housing the Mayor and boroughs will still need to plan for people who want to build their own home as this approach is contained in the NPPF. This approach would still highlight the needs of the PRS and is likely to enable planning policy to consider any wider programmes to support the delivery of private rented accommodation which could be aimed at increasing the overall housing supply in London. Not referencing custom build housing is not likely to have an effect on the objective. **Minor positive effect.**
6. Employment			
It is unlikely that custom build housing will result in a significant amount of additional employment opportunities being created. However, support for the PRS which may result in a substantial number of houses being built, could provide employment in the construction sector and associated sectors (e.g. finance, legal, retail). Although a large proportion of these jobs are likely to be temporary, construction can support training opportunities and provide people with skills for further employment in line with the wider London Plan policies (e.g. Policy 4.12). **Minor positive effect.**	Whilst it is not considered that custom build housing will result in a significant amount of additional jobs, the lack of support of the PRS is more likely to limit the provision of employment and training opportunities. However, the Mayor and boroughs would still need to plan for the custom build housing and PRS (NPPF and draft NPPG). **Minor negative effect.**	Not referencing the PRS could result in reduced opportunities for employment and training. Custom build housing is not likely to make a large contribution to the job market. **Minor negative effect.**	Only making reference to the PRS is likely to still have beneficial effects on the objective as support of this sector is likely to encourage construction of new houses. This could increase opportunities for employment and training. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B	Alternative option C
7. Stable Economy			
Supporting the delivery of housing is likely to support the economy, particularly by encouraging investment in the PRS. **Minor positive effect.**	This approach may limit the significant provision of additional housing and the subsequent benefits on the economy. **Minor negative effect.**	Not including reference to the PRS is likely to limit the provision of additional housing and the subsequent benefits on the economy. **Minor negative effect.**	Custom build housing is not likely to make a large contribution to the economy. This approach makes reference to the PRS and would potentially encourage investment in this sector. **Minor positive effect.**
8. Flood Risk and Climate Change Adaptation			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option A	Alternative option B	Alternative option C
16. Air Quality			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option highlights the support given to the PRS and custom build housing by the planning system. This approach supports a number of objectives, mainly through reference to the PRS. Alternative option C would only reference custom build housing which is not likely to have an effect on the objectives. However, this approach supports the PRS and would therefore have similar effects as the preferred option. Not making reference to the PRS (alternative options A and B) is likely to limit the provision of housing and subsequent benefits. It must be noted that that Mayor and boroughs will need to plan for the PRS and custom build housing, as this is contained in the draft NPPG and the NPPF. However, without inclusion of these references in the London Plan boroughs may not give this issue priority.

4.3 Opportunity Areas

4.3.1 Background

Opportunity Areas are London's major 'reservoirs' of brownfield land, identified as having significant potential to deliver homes and jobs. These areas will play a vital role in shaping London over the period of the Plan and delivering a large proportion of London's housing and employment demand. Typically, Opportunity Areas can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two. This is supported by the policy changes to put additional focus on housing provision in town centres and opportunity areas.

Policy 2.4 of the London Plan describes the regeneration of the Olympic Park and its surrounding area as the single most important regeneration project for the next 25 years. It will sustain existing stable communities and promote local economic investment to create job opportunities driven by community engagement.

Policy Change: Include reference to the London Legacy Development Corporation and its planning powers.

In February 2012, the Mayor of London announced his formal decision to create a Mayoral Development Corporation that will be responsible for the regeneration legacy following the London 2012 Olympic and Paralympic Games.

Following its formation, the London Legacy Development Corporation (LLDC) was granted the full range of planning functions which a local planning authority would normally have responsibility for. Therefore, the Legacy Corporation has taken on planning functions of the Olympic Delivery Authority, the London Thames Gateway

Development Corporation and the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest for the land within its area.

The purpose of the Legacy Corporation is to promote and deliver regeneration of the Olympic Park and its surrounding area by:

- Securing high quality sustainable development;
- Ensuring the long-term success of the facilities and assets within its direct control; and
- Supporting and promoting the aim of convergence.

The proposed change acknowledges the agreed purpose of the Legacy Corporation and recognises its planning powers (preferred option). The alternative option would not update and set out matters that should be considered in the strategic planning and planning decisions of the LLDC and adjoining boroughs. **Table 4.7** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.4 C – The 2012 Games and Their Legacy

Table 4.7 Assessment of preferred and alternative options

Preferred option	Alternative option
To update and outline requirements for the matters that should be considered when the London LLDC and adjoining boroughs are preparing Plans and making planning decisions.	Not to update and set out matters that should be considered when the LLDC and adjoining boroughs are preparing Plan and making planning decisions.
1. Regeneration & Land Use	
The approach provides direction and could facilitate the delivery of development, regenerating the LLDC area and adjoining boroughs through clear decision making. **Minor positive effect.**	If the new role of the LLDC is not reflected in the London Plan, this could result in decisions that would not take into account the needs of the LLDC area **Minor negative effect.**
2. Biodiversity	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3. Health and Well-being	
This option retains the aims of giving cognisance to affordable recreational and sporting facilities and reducing health inequality by increasing participation in sport and physical activity. **No effects** on the objective are anticipated from this option.	This option gives cognisance to affordable recreational and sporting facilities. It also aims to reduce health inequality by increasing participation in sport and physical activity. **No effects** on the objective are anticipated from this option.
4. Equalities	
The LLDC will fulfil its purpose by supporting and promoting the aim of convergence, which is more likely to ensure equitable outcomes for communities in the LLDC area and adjoining boroughs. In addition, the policy retains the objectives to reduce health inequality. **Major positive effect.**	Without acknowledging the purpose of the LLDC, this option has no reference to convergence and thus is not as likely to ensure equitable outcomes for the LLDC area and adjoining boroughs. However, this option does include the objective to reduce health inequality. **Minor negative effect.**

Preferred option	Alternative option
5. Housing	
Delivery of housing is an objective of the plan making decisions for the LLDC area. Therefore, this option is likely to result in the delivery of additional housing. The OAPFs estimates that this area could provide up to 29,000 new homes. **Major positive effect.**	The LLDC DPD identifies the requirement of development to contribute towards achieving the delivery of new homes. Without acknowledging the new role and powers of LLDC as part of this option, it may be that delivering additional housing will not be considered as a priority. **Major negative effect.**
6. Employment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
No effects on the objective are anticipated from this option	**No effects** on the objective are anticipated from this option
12. Accessibility and Mobility	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option brings the London Plan in line with the aims of the LLDC and recognises the Corporation's planning power. The assessment has found that the preferred option has an overall beneficial effect on the

sustainability objectives. The option has been predicted to have a positive effect on housing in particular. This is because the provision of housing is one of the main aims for the LLDC area.

4.4 Delivery of Development

Policy Change: Reference detailed policies for Central Activities Zone (CAZ) and the use of Mayoral Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF)

The Central Activities Zone (CAZ) contains a broad and unique range of vitally important services, including governmental facilities, business services, media, retail, tourism, culture and entertainment. London's CAZ is relatively small in geographical and population terms, but contains 30% of London's jobs and is projected to accommodate up to 36% of London's employment growth up to 2026[7].

The preferred option includes changes to further encourage the delivery of development by:

- Encouraging Boroughs to set out further guidance for development in the CAZ; and
- Setting out that the Mayor will consider using Mayoral Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF).

The alternative option would not include references to detailed policies for the CAZ and the use of Mayoral Development Corporations, Enterprise Zones and Tax Increment Finance. **Table 4.8** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.11 – Central Activity Zones – Strategic Functions
Policy 8.1 – Implementation

Table 4.8 Assessment of preferred and alternative options

Preferred option	Alternative option
To include references to more detailed policies for the CAZ and the use of MDCs, EZs and TIF.	Not to include references to more detailed policies for the CAZ and the use of MDCs, EZs and TIF.
1. Regeneration & Land Use	
The Mayor will consider promoting the establishment of further MDCs, EZs and TIF, where it would significantly support the delivery of substantial development. These mechanisms are likely to support regeneration. Furthermore, it is likely that the provision of further guidance within the CAZ would encourage investment in this area and would subsequently make efficient use of previously developed land.	This approach is not likely to encourage investment and could limit the opportunities for development likely support regeneration. **Minor negative effect.**

[7] http://www.london.gov.uk/thelondonplan/caz/central_activities.jsp (last accessed 03/12/2013)

Preferred option	Alternative option
Major positive effect.	
2. Biodiversity	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being	
The proposed approach encourages Boroughs which are fully or partially located within the CAZ to develop detailed strategies/proposals which take priorities and functions of the CAZ, as stated in the London Plan, into account. This includes planning for improvements of the infrastructure for public transport, cycling and walking. Consequently, the approach could support health and well-being by encouraging physical activity. **Minor positive effect.**	This approach may limit the provision of infrastructure for public transport, cycling and walking by not putting additional focus on the strategic priorities for the CAZ. **Minor negative effect.**
4. Equalities	
This approach is likely to promote regeneration, improve infrastructure, improve access to jobs, and could therefore reduce inequalities, particularly in areas of deprivation. **Minor positive effect.**	It is less likely that inequalities would be reduced through this approach. **Minor negative effect.**
5. Housing	
MDCs, EZs and TIF are likely to encourage investment and to support the delivery of housing, particularly within opportunity areas which have potential for the significant delivery of housing. It is likely that appropriate infrastructure will be in place for new residents, particularly where opportunity areas are located within the CAZ. **Major positive effect.**	This approach is less likely to encourage the provision of housing as it does not make reference to mechanisms which could be used by the Mayor to encourage the delivery of housing. **Minor negative effect.**
6. Employment	
This approach is likely to have beneficial effects on the objective as the proposed changes would support the CAZ, which plays in important role for the provision of jobs. This includes a wide range of jobs such as retail, tourism, finance and other office based jobs. Furthermore, it is likely that encouraging development would provide employment and training opportunities. However, the latter jobs are likely to be temporary for the duration of the construction period. **Minor positive effect.**	This approach is less likely to support the objective as it would not put additional focus on the support of CAZ and is less likely to encourage investment. **Minor negative effect.**
7. Stable Economy	
It is likely that the local and wider economy would be supported by this approach. The proposed changes would encourage development, stimulate the provision of jobs and would ensure that London is attractive for visitors and foreign investors. Consequently, it is likely that benefits for the local, and potentially for the wider economy, would result from the proposed change. **Minor positive effect.**	This option is less likely to support the objective as it may result in the degradation of the CAZ, which is of particular significance to London's economy, and is less likely to offer employment and training opportunities. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
The proposed policy change encourages Boroughs which are fully or partly located within the CAZ to develop detailed strategies/proposal which take priorities and functions of the CAZ, as stated in the London	This approach would not support the objective as it does not place additional focus on addressing the effects of climate change, such as urban heat effects. Not paying consideration to this issue could

Preferred option	Alternative option
Plan, into account. This includes addressing issues of environmental quality resulting from urban heat. **Minor positive effect.**	aggravate urban heat effects through poor planning. **Minor negative effect.**
9. Climate Change Mitigation and Energy	
Strategic priorities within the CAZ include improving infrastructure for public transport, walking and cycling which is likely to reduce emissions of greenhouse gases and could support London in meeting its emission targets. Furthermore, the London Plan prioritises the development of district energy networks within the CAZ, where feasible. District energy networks have the potential to reduce the emission of CO_2, particularly if technologies such as combined heat and power (CHP) are used. **Minor positive effect.**	This approach is likely to support the objective as it would not place additional focus on the development of infrastructure for sustainable modes of transport. It is likely that the full potential for district energy networks would not be recognised. **Minor negative effect.**
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility	
This approach is likely to support more sustainable methods of transport as this is one of the strategic priorities for the CAZ and would consequently make services and facilities more accessible. **Minor positive effect.**	It is possible that opportunities for the provision/enhancement of infrastructure for public transport, cycling and walking would be missed through this approach. **Minor negative effect.**
13. Built and Historic Environment	
The London Plan gives consideration to cultural heritage, including World Heritage Sites and historic heritage. The protection and enhancement of these features is one of the strategic priorities for the CAZ. **Minor positive effect.**	This approach is less likely to support the objective and could result in opportunities for the enhancement of cultural heritage being missed. **Minor negative effect.**
14. Liveability and Place	
The proposed alteration is likely to support the objective as regeneration, particularly of deprived areas, is likely to improve resident's perception of their neighbourhood. It is likely that investment and subsequent regeneration will support mixed communities with a range of services and facilities. Furthermore, it is likely that the proposed alterations would encourage mixed uses and would subsequently support and enhance the availability of cultural, leisure and recreational facilities within the CAZ. **Minor positive effect.**	This option is less likely to support the objective as it does not support regeneration and its subsequent benefits. **Minor negative effect.**
15. Open Space	
The proposed policy change encourages Boroughs which are fully or partly located within the CAZ to develop detailed strategies/proposal which take priorities and functions of the CAZ, as stated in the London Plan, into account. This includes supporting and enhancing open spaces such as the Royal Parks, public realm and other smaller open	This approach could result in opportunities for the enhancement of open spaces and public realm being missed in planning. Moreover, it is possible that open spaces could be adversely affected if boroughs do not have detailed strategies/proposals in place, setting out how open spaces etc. should be considered in planning.

Preferred option	Alternative option
spaces. **Minor positive effect.**	**Minor negative effect.**
16. Air Quality	
This approach is likely to support more sustainable methods of transport as this is one of the strategic priorities for the CAZ. Emissions of greenhouse gases and other transport related pollutants are likely to be reduced through this approach. **Minor positive effect.**	This approach is less likely to reduce emissions associated to road traffic and would consequently not support the objective. **Minor negative effect.**

The proposed policy changes are likely to have beneficial effects on several effects. These are of particular significance for regeneration and the provision of housing as they are likely to encourage investment. Potential minor benefits on a range of objectives have been identified through the assessment. These are mainly a result of referencing the strategic priorities for the CAZ for inclusion in detailed policies/proposals to be prepared by the Boroughs.

4.5 Transport

4.5.1 Background

The latest Annual Monitoring Report (AMR) 9 2011-2012 shows that the total daily journey stages in 2011 were 29.9 million, an increase of 4.3 million stages since 2001. A journey stage is a component of a trip using a single mode of transport from one interchange to another (or trip destination). Of these stages the majority was taken via public transport (43%); the use of public transport has increased by over 30% since 2001, whilst private transport per head has decreased by 17%. Overall, public transport use per head continues to grow at a faster rate than private transport, which continues to fall year on year.

Policy Change: Allow a more 'flexible approach' to be taken with respect to car parking in Outer London.

The preferred option updates the car parking standards and associated policies to allow for a 'flexible approach' to be taken with respect to Outer London areas. It aims to enhance outer London's attractiveness as an office location and secure the vitality and viability of its town centres. In addition, the preferred option will support the delivery of housing in areas with low public transport accessibility levels (PTAL); however, it is acknowledged that this is likely to be minimal. The alternative option leaves the policy unchanged. The assessment has been undertaken with the assumption that this policy will encourage travel by private vehicle overall, particularly in Outer London. However, it should be borne in mind that some boroughs may not choose to exercise this 'flexible approach' and remain with more stringent parking standards. **Table 4.9** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.8 – Outer London – Transport
Policy 6.13 – Parking

Table 4.9 Assessment of preferred and alternative options

Preferred option	Alternative option
To update the car parking standards and associated policies	Not to update the car parking standards and associated policies.
1. Regeneration & Land Use	
A more flexible approach to car parking standards will benefit those with access to a car in areas with low PTAL. Greater accessibility will, in turn, create a 'sense of place and vibrancy'. The option is more likely to support town centres and offices in Outer London, increasing regeneration benefits. **Minor positive effect.**	This option will not increase accessibility in areas with low PTAL. Poor accessibility will not create such a "sense of place and vibrancy". The option is less likely to support town centres and offices in Outer London, reducing regeneration benefits. **Minor negative effect.**
2. Biodiversity	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being	
A more flexible approach to car parking standards may discourage people from walking or cycling in Outer London. In addition, an increase in traffic emissions will have implications on air quality, which could be detrimental to Londoners' health. However, this is mitigated in the London Plan through other measures, including a number of schemes to encourage cycling (Table 6.1 of the London Plan). In addition, this option will also provide positive effects by supporting people with mobility problems. **Minor positive/minor negative effect.**	This option could be beneficial in that it would encourage people to walk or cycle. In addition, there is less likely to be fewer health implications from poor air quality. However, this option does not support those with mobility issues. **Minor positive effect/minor negative effect.**
4. Equalities	
This option will offer greater accessibility for older and disabled people who drive and cannot travel by public transport. This option is a fair approach for people who may be required to drive for work and for those who need to travel at night when public transport is not an option. **Minor positive effect.**	This option is less likely to support those with mobility issues such as older and disabled people who drive and cannot travel by public transport. The option does not address issues of social exclusion. The option is less likely to support those who may be required to drive for work and for those who need to travel at night when public transport is not an option. **Minor negative effect.**
5. Housing	
This option is more likely to support the delivery of housing in low PTAL areas. With better accessibility to local services, Outer London areas will become more desirable places to live. This, in turn, will encourage housing developers to these areas. **Minor positive effect.**	This option is less likely to support the delivery of housing in low PTAL areas. **Minor negative effect.**
6. Employment	
This option supports people who would require a vehicle for work. Furthermore, it provides greater accessibility and thus increases employment options for those in low PTAL areas. The option also helps to enhance Outer London's attractiveness as office location and is likely to increase employment opportunities	This option does not support people who would require a vehicle for work. Furthermore, it does not provide better accessibility and thus decreases employment options for those in low PTAL areas. The option does not help to enhance Outer London's attractiveness as office location and is unlikely to increase employment

Preferred option	Alternative option
outside of Central London. **Minor positive effect.**	opportunities outside of Central London. **Minor negative effect.**
7. Stable Economy	
This option helps to enhance areas in Outer London as office locations. It services are easier to access, the loss of local business will be prevented and business start-ups will be encouraged. **Minor positive effect.**	This option is less likely to support town centres and offices in Outer London. Consequently, local businesses will find it harder to survive and business start-ups will not be encouraged. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
This option would encourage people to travel by private vehicle rather than using public transport, walking or cycling. Although the Mayor is working to support the use of car clubs and encourage use the use of electric vehicles, this option would increase contribution to greenhouse gases. It is important to note the number of schemes that Mayor has formulated to encourage cycling in areas of Outer London. **Minor negative effect.**	This option will encourage other more sustainable forms of transport such as walking, cycling or public transport. With fewer private vehicles on London's roads, contribution to greenhouse gases will reduce. **Minor positive effect.**
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility	
This option will support people with mobility problems who are able to drive. However, it will not encourage a shift to more sustainable forms of travel. Indeed, fewer people may elect to travel by using public transport, walking or cycling. Furthermore, this option could result in more congestion, which will increase journey times and will increase the chance of road accidents. **Minor positive/negative effect.**	Whilst this option could encourage a shift to more sustainable forms of travel and prevent the problems associated with traffic congestion, it does not support those with mobility issues. **Minor positive/negative effect.**
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
The additional traffic and congestion that this option may cause could result in a poorer local environment and public realm. However the option could be viewed as a means of promoting the perceived sense of place held by the community. If those in the community feel better connected, they are more likely to be able to enjoy the benefits of local services, facilities and employment opportunities. **Minor positive/minor negative effect.**	This option is likely to discourage the use of private vehicles and, in turn, reduce congestion resulting in a better local environment and public realm. On the other hand, the option bears on the rights of an individual to own a car and may not promote a perceived sense of place held by the community. **Minor positive/minor negative effect.**

Preferred option	Alternative option
15. Open Space	
This option could increase the land take for car parking reducing the amount of open space, particularly private open space. However, Policy 6.13 of the London Plan states that the Mayor strongly encourages a restraint based approach to parking across all land uses. Furthermore, this option will increase accessibility to recreational activities and open space for those in Outer London areas. **Minor positive/minor negative effect.**	This option will protect and enhance areas of open spaces by reducing the land take for car parking. However, the option does not act to improve accessibility to these open spaces. **Minor positive/minor negative effect.**
16. Air Quality	
This option is likely to encourage travel by private vehicle. Despite the Mayor's efforts to encourage the use of electric vehicles, the number of petrol and diesel driven vehicles are likely to increase and, in turn, traffic emissions will increase. Whilst this is anticipated to worsen air quality, this effect will be limited due to the relatively few homes expected to be delivered in areas of low PTAL. **Minor negative effect.**	This option is likely to encourage travel by more sustainable forms of transport. This will reduce traffic emissions and improve air quality. **Minor positive effect.**

The preferred option is likely to be favourable with respect to the objectives on regeneration and land use, equalities, housing, employment and stable economy. However, under the assumption that the use of private vehicles will increase under this option, it has the potential to have negative effects on climate change mitigation and energy and air quality. The alternative option, on the other hand, is likely to have positive effects on these objectives. Both options are likely to have both positive and negative effects on health and well-being, accessibility and liveability and place.

4.6 Town Centres

4.6.1 Background

The Government has introduced policies to enable greater flexibility in the use of properties in town centres to help make better use of existing buildings, relive the housing shortage and revitalise town centres. The proposed new permitted development right would enable shops and offices of up to 150 sq metres, in the A1 And A2 use classes to change to housing and would be effective for three years.

The proposals essentially mean that local authorities would be expected to deviate from a plan-led approach and allow ad-hoc changes to the retail scene. This could result not only in the rapid decline of small retails units and independent trading but also reduce the range of employment opportunities in town centres. The impact would be particularly harmful to small businesses in high value residential areas, where residential conversions could be considered as more profitable by landlords.

A number of councils are considering whether to opt out of the new regulations to protect existing businesses from being pushed out of town centre locations. Local authorities have an opportunity to seek an exemption if they can demonstrate that residential conversion will adversely impact on the local economy. Numerous councils including Islington and Richmond have sought to introduce an Article 4 direction to exempt some of its primary offices and retail space from being converted to residential use.

The London Plan 2011 notes that in outer and inner London, town centres are the most accessible locations on the public transport system and are the centres of their communities. They are key locations for a diverse range of activities, including retail, leisure and office space as well as housing, social infrastructure and public open space. They are also key nodes for more effective land use and transport integration, enabling intensification, encouraging walking, cycling and greater use of public transport and fostering social inclusivity, especially for the substantial number of Londoners who do not have a car.

Policy Change: Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing.

The demand for retail floor space in London, particularly central London, is higher than in the rest of the country. However, some town centres may experience significant changes due to shifting shopping habits, particularly due to the projected increase in internet shopping. At this point it is uncertain how the demand for different types of retail floorspace and employment space will change, due to uncertainties in the economy.

The proposed changes would alter policies to support efficient use of floorspace in town centres and to encourage the provision of housing in town centres (preferred option). Alternative option A would not include policies on the efficient use of floorspace, whilst option B would not specifically encourage the provision of housing in town centres. **Table 4.10** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.4 – The 2012 Games and their Legacy
Policy 2.7 – Outer London: Economy
Policy 2.15 – Town Centres
Policy 4.7 – Retail and Town Centre Development
Policy 4.8 – Supporting a Successful and Diverse Retail Sector

Table 4.10 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
To include policies that support the efficient use and proactive management of floorspace in town centres, noting that new ways of shopping may result in the demand for retail floorspace, and encourage higher density housing, where appropriate.	Do not include proactive policies on the efficient use of floorspace in town centres.	Do not specifically encourage the provision of housing in town centres.

Preferred option	Alternative option A	Alternative option B
1. Regeneration and Land Use		
This approach is likely to promote the viability of town centres by limiting the potential for vacant units and bringing additional regeneration opportunities and activity into town centres through housing and new residents. **Minor positive effect.**	This approach could result in more vacant units by not promoting the efficient use of floorspace. However, encouraging the provision of housing in town centres could promote regeneration of town centres. **Minor negative/minor positive effect.**	This approach is likely to limit regeneration benefits from the provision of housing in town centres. However, encouraging the efficient use of floorspace could have beneficial effects on the objective. **Minor negative/minor positive effect.**
2. Biodiversity		
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3.Health and Well-being		
This approach is likely to promote the delivery of additional housing in town centres. Town centres usually are well connected through public transport and offer a wide range of services and facilities. These central locations can be beneficial for residents as they are more likely to use sustainable transport, including walking and cycling, and by improving access to facilities such as doctors and clinics, which could promote a more active lifestyle. Furthermore, it is likely that existing facilities would be maintained and that additional facilities would be provided to cover an increased number of residents. **Minor positive effect.**	Encouraging the provision of housing in town centres is likely to have beneficial effects on the well-being of residents as facilities and services are likely to be more accessible within town centres. Furthermore, residents are more likely to use sustainable methods of transport which in consequence could encourage active lifestyles. **Minor positive effect.**	This approach would encourage the efficient use of floorspace which could promote regeneration. This could promote the viability of town centres and support existing facilities. **Minor positive effect.**
4. Equalities		
Delivering additional housing in town centres may encourage investment in social and physical infrastructure which could reduce inequalities in the area and promote integrated communities. This would be supported by reducing inequalities in housing accessibility. Furthermore, this approach could reduce inequalities for residents which are less able to travel, such as older people, disabled people and children, as services and facilities would be more accessible. **Minor positive effect.**	Delivering additional housing in town centres is likely to reduce inequalities in the area and promote integrated communities. This approach could reduce inequalities for residents which are less able to travel. **Minor positive effect.**	This approach would promote efficient use of floorspace in town centres but would not encourage the delivery of additional housing. It is likely that existing and new shops and services would be supported through this approach, keeping these accessible for residents who are less able to travel. **Minor positive effect.**
5. Housing		
Town centres are generally well connected to public transport and have a number of services and facilities. Promoting the delivery of housing in this area is likely to have a beneficial effect on the objective by ensuring that appropriate infrastructure is in place for new residents. Furthermore, it is likely that this approach would enhance the amenity	This approach would promote the delivery of housing in town centres which is likely to have beneficial effects on the objective. However, not including policies on the efficient use of floorspace could limit opportunities for the provision of housing. **Minor positive/minor negative effect.**	This approach would encourage the efficient use of floorspace but does not make reference to the provision of housing in town centres. This is likely to restrict housing provision in town centres which could contribute to meeting London's housing needs. **Minor negative effect.**

Preferred option	Alternative option A	Alternative option B
value as it is likely that investment in the area would be stimulated. Making efficient use of available floorspace would further support the objective but freeing unneeded space for housing. **Minor positive effect.**		
6. Employment		
This approach is likely to support viable town centres, both through ensuring appropriate amount and type of retails space as well as bringing in residents. However, although this may result in additional employment opportunities it could concurrently reduce the range of opportunities for job seekers, as small and independent businesses are at risk from being marginalised by residential conversion. **Minor positive effect/minor negative effect.**	This approach could result in vacant units and would in consequence not support the viability of town centres. This may result in the loss of more local jobs than just as a result of the change in retail habits. **Minor negative effect.**	This option would support the viability of town centres by ensuring that efficient use of floorspace is made and avoiding vacant units. This is likely to support existing local jobs. **Minor positive effect.**
7. Stable Economy		
This approach is likely to attract investment into struggling town centres and regeneration areas which could have localised beneficial effects. Furthermore, it is likely that the approach would reassure and attract investors, stimulating investment in the economy. Conversely, it could undermine the local economy as small and independent businesses are at risk from being marginalised by residential conversions **Minor positive effect/minor negative effect.**	Not supporting the efficient use of floorspace may result in vacant units and could have detrimental effects on the objective. **Minor negative effect.**	This approach would support the viability of town centres by ensuring that efficient use of floorspace is made and avoiding vacant units. **Minor positive effect.**
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
Town centres are generally well connected to public transport and provide services and facilities in the vicinity. This is likely to support the use of sustainable transport, including public transport, walking and cycling. The delivery of additional housing in town centres could help London in meeting its greenhouse gas emission targets and support the objective. Further, increased densities and a mix of uses are more likely to support decentralised energy networks. **Minor positive effect.**	This approach is likely to help London meet its greenhouse gas emission targets by reducing the need to travel for residents. However, not promoting the efficient use of floorspace could result in degradation of town centres which could minimise benefits or result in adverse effects as the need for travel may be increased. **Uncertain effect.**	Encouraging the efficient use of floorspace is likely to increase the viability of town centres and to encourage investment in the area. The provision of further shops and services could reduce the need for travel for existing residents. It is likely that this approach would support London in meeting its greenhouse gas emission targets. **Minor positive effect.**
10. Water Quality and Water Resources		
No effects on the objective are anticipated	**No effects** on the objective are anticipated	**No effects** on the objective are anticipated

Preferred option	Alternative option A	Alternative option B
from this option.	from this option.	from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
This approach is likely to have beneficial effects on the objective as town centres are generally compact and well serviced with public transport. Residents would be living in a location where minimal travel is required to reach shops and services. This approach could alleviate the demand for developing less sustainable locations, placing less pressure on the transport network. **Minor positive effect.**	This option supports the delivery of housing in town centres which is likely to reduce the need to travel .However, town centres viability could be reduced as it is possible that this approach could result in vacant units. The effects of this approach, particularly in the long term are uncertain. **Uncertain effect.**	This approach could result in the development of less sustainable locations which may require residents to travel further to reach shops and services and could place additional pressure on the transport network. Keeping the town centres viable by ensuring that floorspace is used efficiently could have beneficial effects for residents as it is likely to support existing shops and services. **Minor negative/minor positive effect.**
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
Supporting the viability of town centres by promoting efficient use of land and bringing new residents into the area may encourage investment in social and physical infrastructure which could include culture, leisure and recreational activities. Investment is likely to support vibrant and diverse communities. Overall it is likely to that regeneration of the area will support the quality of life for residents. Conversely, the potential loss of small and independent businesses to housing could risk the town losing its place identity and place making qualities. **Minor positive effect /minor negative effect.**	This approach could result in vacant units and may reduce the viability of town centres. However, encouraging the delivery of housing within town centres is likely to encourage investment in social and physical infrastructure and support existing shops and services. Consequently supporting vibrant communities and diverse communities and supporting quality of life, albeit to a lesser extent than the preferred option. **Minor positive effect.**	This approach is likely to increase viability of town centres by ensuring that floorspace is used efficiently and is likely to support shops and services and subsequently diverse and vibrant communities. This is likely to have beneficial effects on the quality of life of existing residents. **Minor positive effect.**
15. Open Space		
Making efficient use of existing floorspace and promoting the delivery of housing in town centres is likely to reduce the need for development on less sustainable sites, such as the Green Belt and open spaces. **Minor positive effect.**	Encouraging the delivery of housing in town centres is likely to reduce pressure for development in less sustainable locations. However, this approach would not place emphasize on the efficient use of existing floorspace. **Minor positive/minor negative effect.**	This approach would make efficient use of floorspace could minimise the need for further development on less sustainable sites. Efficient use of available brownfield space for the provision of housing could be limited through this option. **Minor positive/minor negative effect.**
16. Air Quality		
The delivery of housing within town centres which offer a wide range of shops and services is likely to reduce the need for travel.	This approach is likely to reduce emissions of greenhouse gases and other pollutants associated with traffic by reducing the need to	Encouraging the efficient use of floorspace is likely to increase the viability of town centres and to encourage investment in the area. The

Preferred option	Alternative option A	Alternative option B
This approach is likely to reduce greenhouse gas emissions as well as other emissions associated with traffic. **Minor positive effect.**	travel through the delivery of housing within town centres. However, not promoting the efficient use of floorspace could result in degradation of town centres which could minimise benefits or result in adverse effects as the need for travel and subsequent emissions may be increased. **Uncertain effect.**	provision of further shops and services could reduce the need for travel for existing residents. It is likely that this approach would have a positive effect on the reducing of greenhouse gas and air pollutant emissions. **Minor positive effect.**

The preferred option is likely to have a number of positive effects on the objectives as it would promote the efficient use of floorspace and the provision of housing within town centres. This approach would make efficient use of land and would support the delivery of housing and its subsequent benefits. Not including either reference could reduce the viability of town centres. Conversely, the preferred option could have a negative effect on some objectives as the potential loss of small and independent businesses to housing, would reduce the range of businesses and employment opportunities and in turn risk the loss of place identity.

Policy Change: Reflect the status and function of town centres, including Stratford.

The London Plan sets out the classification of town centres according to their existing role and function in light of health checks taking into account criteria which include scale, mix of uses, financial performance and accessibility. The latest town centres health checks were carried out in 2013 and the preferred option is to reflect these outcomes in the alterations. The preferred policy approach is to update the status of the town centres to ensure their long term viability, and where appropriate to release surplus land for other uses, especially higher density housing. Status and function would not be updated under the alternative option. **Table 4.11** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.4 – The 2012 Games and their Legacy
Policy 2.15 – Town Centres
Policy 4.7 – Retail and Town Centre Development

Table 4.11 Assessment of preferred and alternative options

Preferred option	Alternative option
Update the current status and function of town centres.	Do not update the current status and function of town centres.
1. Regeneration and Land Use	
This approach is likely to ensure that any growth, potential growth (indicated by planning permissions) or decline of town centres is reflected in planning policies. This is likely to ensure growth is supported by wider infrastructure provision whilst decline is managed and changes of use, such as housing are encouraged to support regeneration and the remaining town centre services. **Minor positive effect.**	This approach would not update the plan to reflect the status and function of town centres. Consequently, recent trends such as growth, potential growth and decline of town centres would not be reflected in planning policy. The option is less likely to ensure that growth is supported by wider infrastructure provision and that decline is identified and adequately managed, which may result in the degradation of town centres.

Preferred option	Alternative option
	Minor negative effect.
2. Biodiversity	
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3. Health and Well-being	
Updating the status of town centres is likely to ensure long term viability and consequently would support the provision of facilities (e.g. GP, clinics) in the community. **Minor positive effect.**	This approach could result in the degradation of town centres and reduce their viability. This could result in the loss of local facilities. **Minor negative effect.**
4. Equalities	
This approach is likely to support the viability of town centres and to encourage investment in social and physical infrastructure which could reduce inequalities in the area and promote integrated communities. Furthermore it is likely to promote the provision of services within town centres and would promote equalities for those who are less able to travel, such as older people, people with disabilities and children, by offering them the opportunity to access these services. **Minor positive effect.**	This approach could result in the degradation of town centres and reduce their viability. It is likely that this would result in less investment in, or the loss of, of services and social infrastructure. Equality of access to services and infrastructure would be reduced as a consequence which would be of particular relevance to those who are less able to travel. **Minor negative effect.**
5. Housing	
Updating the plan with the current status and function of town centres is likely to help identify areas which are no longer viable. This would allow the release of surplus land for other uses, such as high density housing, where appropriate. Consequently, this alternative may contribute to the delivery of sufficient housing. **Minor positive effect.**	This approach is less likely to free up land and therefore would limit the delivery of housing across London. **Minor negative effect.**
6. Employment	
This approach is likely to support viable town centres through ensuring appropriate retail space as well as bringing in residents. This is likely to support existing jobs and may result in additional employment opportunities. **Minor positive effect.**	This approach may result in town centres not being managed adequately and could result in the degradation of town centres and subsequent loss of local jobs. **Minor negative effect.**
7. Stable Economy	
Identifying the current function and status of town centres is likely to allow for long term management and is likely to reassure and attract investors. Where appropriate this approach would support the release of surplus land for the delivery of housing which is likely to attract developers. **Minor positive effect.**	This approach could result in the degradation of town centres which would have adverse effects on the local economy. Furthermore, it is less likely that land would be released for housing development and subsequently investment in the area may be limited. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	

Preferred option	Alternative option
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility	
Town centres are generally compact and well connected to public transport which is likely to promote the use of more sustainable methods of travel such as walking, cycling and public transport. This approach is likely to support the viability of town centres and to promote the provision of shops and services. This would reduce the need for travel which would be of particular relevance to those who are less able to travel, such as older people, disabled people and children. **Minor positive effect.**	This approach could result in the degradation of town centres and reduce their viability. It is likely that local shops and services would be lost as a consequence which would increase the need for travel. Furthermore, this approach is likely to limit the amount of land being released for housing within town centres and could result in the development of less sustainable areas which may be less accessible. **Minor negative effect.**
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
This approach is likely to support the viability of town centres and to stimulate investment in social and physical infrastructure for the provision of key services, recreation and leisure. Releasing land for the delivery of housing within town centres is likely to provide a more centralised focus for local activities and could support inclusive and mixed communities. **Minor positive effect.**	This approach could reduce the viability of town centres and may result in the loss and reduced investment in social and physical infrastructure. **Minor negative effect.**
15. Open Space	
Identifying the current function and status of town centres is more likely to result in the release of surplus land for housing development within town centres. This is likely to alleviate pressure on less sustainable locations such as sites on the Green Belt and open spaces. **Minor positive effect.**	This alternative is less likely to result in the release of surplus land for housing development. Consequently, it is likely that additional pressure would be put on local authorities to develop less sustainable sites which may result in the loss of open space. **Minor negative effect.**
16. Air Quality	
This approach is likely to result in the provision of housing within town centres by releasing land for housing where appropriate. Further, it is likely to ensure the viability of town centres and subsequently support local shops and services. Overall this approach reduces the need for travel and would reduce emissions of greenhouse gases and pollutants. **Minor positive effect.**	This approach may result in the degradation of town centres which could result in the loss of shops and services within the community and would subsequently increase the need for travel. **Minor negative effect.**

The preferred approach would support the viability of town centres by making efficient use of land and supporting housing development within town centres. This would support regeneration and accessibility to services. The alternative option would not update the plan with the newest available information. This may result in opportunities being missed.

4.7 Employment

London provides a large proportion of the UK's finance and office jobs and has a strong academic and research sector. Life sciences have been identified as an important growth sector for London, reflecting the available research and teaching strengths. Within this sector there is a particular demand for affordable grow on space, including laboratory space, to ensure London retains the innovations emerging from London based universities.

London has become the European capital of digital technology with an estimated 48,000 jobs[8] now dependent on the sector and the largest concentration of Information & Communications Technology (ICT) and software firms in Europe[9]. The Mayor's 'Smart London' initiative to promote the use of new technologies, complements the trend of new sectors emerging in London's economy. This is also reflected in the Government's commitment to invest in the Tech City Open Institute hub on the City fringe.

There are major infrastructure improvements taking place across London, including Crossrail, decentralised energy infrastructure and improvements to London's electricity supply. In addition, there are further infrastructure proposals to help support London's growth, as well as that of the wider UK, such as High Speed 2 and the Thames Tideway Tunnel.

Policy Change: Ensure employment/workspace meets the needs of emerging sectors of the economy.

The proposed changes seek to support the provision of employment/workspace to meet different requirements, including the needs of emerging sectors such as digital technology and life sciences sectors and business start-ups (preferred option). The alternative options would not include additional policies (alternative A), only address the needs of known emerging sectors (alternative B), or only address innovative ways of providing employment/work space (alternative C). **Table 4.12** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.9 – Inner London
Policy 4.10 – New and Emerging Economic Sectors

Table 4.12 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B	Alternative option C
Include policies to ensure employment/workspace meets the diversity of needs, including the needs of the emerging	Do not include policies to ensure employment/workspace meets the needs of the emerging sectors of the economy.	Only address the known emerging sectors of the economy.	Only address innovative ways of providing employment/workspace.

[8] Centre for London (2012) A Tale of Tech City – The Future for Inner East London's Digital Economy.

[9] GLA (2012) London's Digital Economy

Preferred option	Alternative option A	Alternative option B	Alternative option C
sectors of the economy.			
1. Regeneration and Land Use			
This approach is likely to ensure that employment space meets current and future needs, including the needs of business start-ups and the emerging sectors of the economy. These may not represent the predominant form of employment space but addressing their specific requirements such as superior internet capacity, purpose built facilities such as laboratories of cheaper floorspace is likely to result in regeneration that would be supported through additional investment. **Minor positive effect.**	This option is less likely to ensure that employment space meets the needs of start-ups and the emerging sector. **Minor negative effect.**	Only addressing the known emerging sectors of the economy within the policy is likely to still ensure that employment space meets current and upcoming needs of these sectors. However, provision may not be flexible enough to cater for longer term emerging sectors of the economy as set out in the preferred option. **Minor positive effect.**	This approach is likely to ensure employment space meets the requirements of start-up type businesses, however provision may not be flexible enough to cater for the emerging sectors of the economy. **Minor positive effect.**
2. Biodiversity			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
4. Equalities			
This may increase the range of employment opportunities within London which may appeal particularly to younger people. Opportunities for training and skills development may increase which may benefit equalities target groups. **Minor positive effect**	**No effects** on the objective are anticipated from this option.	This may increase the range of employment opportunities in emerging sectors, which may benefit equalities target groups such as younger people, but to a lesser extent than the preferred option. **Minor positive effect**	This may increase the range of employment opportunities, particularly in start-up businesses which may benefit equalities groups such as Asian communities who have high rates of entrepreneurship. **Minor positive effect.**
5. Housing			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment			
The provision of sufficient employment space is likely to create a number of employment opportunities in different sectors which may be particularly appealing to the young population. Furthermore, the approach is likely to provide	This approach could result in the insufficient provision of land to support London's businesses and could result in a smaller range of employment opportunities being created. **Minor negative effect.**	This approach is likely to support employment opportunities within the known emerging sectors. However, it is less likely to support a broader range of jobs as outlined in the preferred option. **Minor positive effect.**	This approach is likely to support employment within business start-ups. However, it is less likely to support a broader range of jobs as outlined in the preferred option. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B	Alternative option C
opportunities for the delivery of training and development of skills. **Minor positive effect.**			
7. Stable Economy			
This approach is likely to support economic growth and development by supporting a wider range of businesses across London, particularly by supporting the emerging sectors which are likely to be of high relevance in the future. **Minor positive effect.**	Not reflecting the needs of start-ups and the emerging sector could result in insufficient amount of land being provided to meet the requirements of these sectors. This could in consequence limit the potential for economic growth. **Minor negative effect.**	This approach is likely to support economic opportunities across a broad range of sectors, however, not to the extent of the preferred option. **Uncertain effect.**	This approach is likely to support economic opportunities for business start-ups. The economic development is less likely to be of the same extent as the preferred option. **Uncertain effect.**
8. Flood Risk and Climate Change Adaptation			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option A	Alternative option B	Alternative option C
16. Air Quality			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option is likely to provide employment opportunities, support a stable economy and to promote regeneration. The proposed approach is likely to support meeting the requirements for employment/workspace for a number of businesses, including small businesses, business start-ups and the emerging sectors.

4.8 Social Infrastructure

4.8.1 Background

Social infrastructure includes community facilities such as schools, libraries, health facilities, religious facilities as open spaces and recreation areas. It is important to ensure social infrastructure is adequate to meet the needs of London's expanding population. The alterations will need to consider the increasing demand for these services as well as the change in the way these services are provided, including the type of building /floorspace, multi-functional spaces and on-going funding and management.

London is projected to have approximately 20% of the land it needs to meet its demand for burial space up to 2031.

Policy Change: Strengthen and clarify the approach to specific types of infrastructure e.g. local community assets, and open spaces.

The proposed alterations to the London Plan 2011 seek to reflect the latest guidance on supporting local infrastructure and latest funding structures for social infrastructure. These include:

- Changes made by the Government to the way health services are provided nationwide;
- Greater devolution of responsibilities from local authorities to schools under the Academies Act 2010; and
- The NPPF replacing long-standing guidance on the planning for local space.

It is proposed to extend the policy and supporting text to cover specific types of infrastructure (e.g. local community assets, schools, playing fields and open space) (preferred option). The alternative options would not extend the policy and supporting text (alternative option A) or only refer to some types of social infrastructure (alternative option B).

Table 4.13 shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 2.18 – Green infrastructure: The Network of Open and Green Spaces
Policy 3.18 – Education Facilities
Policy 4.8 – Supporting a Successful and Diverse Retail Sector
Policy 7.13 – Safety, Security and Resilience to Emergency
Policy 7.18 – Local Open Space
Policy 7.23 – Burial Space
Policy 8.2 – Planning Obligations

Table 4.13 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
Extend policy and supporting text to cover specific types of infrastructure (e.g. local community assets, schools, burial space, playing fields and open space).	Do not extend policy and supporting text to cover specific types of infrastructure.	Only refer to some of the types of social infrastructure.
1. Regeneration & Land Use		
This option is more likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. Therefore land is more likely to be used efficiently and regeneration opportunities are more likely to be supported. **Minor positive effect.**	This option is less likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. Therefore land is less likely to be used efficiently and regeneration opportunities are more likely to be supported. **Minor negative effect.**	This option is more likely to ensure that some relevant social infrastructure is provided in line with guidance and funding structures. Therefore land is more likely to be used efficiently and regeneration opportunities are more likely to be supported. However, this option would not be extensive as the preferred option. **Minor positive effect.**
2. Biodiversity		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being		
This option is more likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures, which could include health and social services. **Minor positive effect.**	This option is less likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. If the correct services are not provided this could have an adverse effect on health and well-being. **Minor negative effect.**	This option is likely to ensure that some relevant social infrastructure is provided, in line with guidance and funding structures, which could include health and social services. However, as only some types will be addressed under this option, it is uncertain what the extent of benefits may be with respect to health and well-being. **Minor positive effect.**
4. Equalities		
This option is more likely to ensure that the relevant social infrastructure is provided, in line with guidance and funding structures, which could include social services to aid disadvantaged people. The encouragement to address the demand for burial space will benefit particular religious groups.	This option is less likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. If the correct services are not provided this could have an adverse effect on disadvantaged people who depend on social services.	This option is likely to ensure that some relevant social infrastructure is provided, in line with guidance and funding structures, which could include social services which aid disadvantaged people. However, as only some types will be addressed under this option, it is uncertain what the extent of benefits may be with respect to addressing

Preferred option	Alternative option A	Alternative option B
Minor positive effect.	**Minor negative effect.**	issues of inequality. **Minor positive effect.**
5. Housing		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
This option is more likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. This could support communities and provide a perceived sense of place. **Minor positive effect.**	This option is less likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures. Therefore it is less likely to ensure communities are supported and provide a perceived sense of place. **Minor negative effect.**	This option is likely to ensure that some relevant social infrastructure is provided in line with guidance and funding structures. This could support communities and provide a perceived sense of place. However, this option would not be extensive as the preferred option. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B
15. Open Space		
This option is more likely to ensure that the relevant social infrastructure is provided in line with guidance and funding structures, which could include open spaces. However, the Mayor already has strong policies in place to provide and protect open spaces. The encouragement to re-use burial space is likely to protect the Green Belt and other open spaces. **Minor positive effect.**	This option is less likely to ensure that the relevant social infrastructure is provided, in line with guidance and funding structures, which could include open spaces. **Minor negative effect.**	This option is more likely to ensure that the relevant social infrastructure is provided, in line with guidance and funding structures, which could include open spaces. However, as only some types will be addressed under this option, it is uncertain what the extent of benefits may be with respect to open space. It is important to note that the Mayor has strong policies in place to protect open spaces. **Minor negative effect.**
16. Air Quality		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option seeks to reflect the latest guidance on supporting local infrastructure and latest funding structures for social infrastructure. This is likely to ensure that the relevant social infrastructure is provided and, therefore, is likely to have a positive effect on most sustainability objectives, namely regeneration and land use, health and well-being, equalities, liveability and place and open space. Alternative option B may result in communities not having the social infrastructure they require, which could have adverse effects on a number of sustainability objectives. Although alternative option C is likely to have a positive effect on several of the sustainability objectives, the extent of the effect is not likely to be greater than that of the preferred option. This is because alternative option C only refers to the implementation of some types of social infrastructure.

4.9 Physical Infrastructure

Policy Change: Maximise the benefits from new infrastructure to secure sustainable growth and development.

The proposed change is aimed at ensuring the wider economic, social and environmental benefits of these infrastructure projects are maximised (preferred option). Alternative option A would not include maximising the benefits from these projects, whilst option B would only seek to maximise economic benefits. **Table 4.14** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives. The provision of large infrastructure projects can have a broad range of environmental and social effects which may vary greatly in magnitude and time scale. Consequently, project specific impacts need to be considered during the specific planning application process and are not covered by this higher tier assessment. It is for example possible, that a large infrastructure project could have adverse effects on biodiversity during the construction period, yet may result in enhanced habitats during operation.

Policies to be altered: Policy 4.1 – Developing London's Economy

Table 4.14 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
To maximise the benefits from new infrastructure to secure sustainable growth and development.	Do not include reference to maximising benefits from new infrastructure.	Only seek to maximise the economic benefits.
1. Regeneration and Land Use		
The proposed policy change refers to maximising benefits from new infrastructure projects to ensure sustainable development. However, it does not specifically refer to social and environmental benefits which particularly in the economic context of the policy is not likely to add any value to the policy. However, it must be noted that social and environmental aspects are covered by the supporting text, and the wider definitions of sustainable development as introduced through the NPPF. **No effect.**	This approach would not place additional value on economic, environmental and social benefits. However, other policies of the London Plan are aimed at protecting and enhancing these aspects and it is likely that the shortcomings of this approach would be picked up. **No effect.**	This approach does not put additional emphasize on environmental and social benefits. However, other policies of the London Plan are aimed at protecting and enhancing these aspects and it is likely that the shortcomings of this approach would be picked up. **No effect.**
2. Biodiversity		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3. Health and Well-being		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
4. Equalities		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
5. Housing		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment		
Placing additional focus on maximising benefits from the delivery of infrastructure could create local employment and training opportunities. **Minor positive effect.**	It is possible that opportunities for provision of employment and training would be missed under this approach. **Minor negative effect.**	This approach is less likely to ensure that a range of social benefits, such as local jobs also result from the provision of the infrastructure as these may not be considered an economic benefit for the developer. It is unlikely that this option would affect the overall number of jobs provided by infrastructure development. **Minor negative effect.**

Preferred option	Alternative option A	Alternative option B
7. Stable Economy		
This approach is likely to put additional focus on the sustainable delivery of infrastructure and could promote green industries and contribute to the development of a low carbon economy. **Minor positive effect.**	This approach does not place additional focus on maximising the benefits from the delivery of new infrastructure. Consequently, it is likely that opportunities for benefits would be missed. **Minor negative effect.**	Putting focus on economic benefits is likely to have positive effects on the objective. However, this approach does not seek to maximise a broader range of benefits which could contribute to the development of a strong, sustainable economy. **Minor positive effect.**
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
No effects on the objective are anticipated from this option**.**	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

It is recommended that the policy is altered to specifically mention economic, environmental and social benefits to ensure that the aims of the policy are clear. The suggested policy change refers to *'benefits ... to secure sustainable growth and development'* and is embedded in an economical context which could give raise to the impression that it mainly refers to economic benefits. The policy change has consequently been assessed as not having an effect on the IIA Objectives and not differing substantially from the outcome of the suggested alternatives as it does not add significant value to the current policy.

Policy Change: Support the development and delivery of infrastructure, in particular gas and electricity infrastructure.

Concerns have been raised by developers that, in some locations in London, there is limited capacity to connect to the electricity network, which is either stalling developments or placing large and unreasonable costs on developers.

The Mayor has formed a high level electricity working group in order to secure a reliable electricity network in London that is able to deliver connections and capacity.

The Mayor has applied to Ofgem for a new type of electricity license which will initially allow the GLA to buy excess electricity produced by London boroughs and public bodies before selling it on at cost price to public sector organisations (e.g. TfL, NHS hospitals, etc.). If this first phase proves to be successful the Mayor plans to extend the scheme to include private sector energy producers. The aim of the scheme is to increase revenues for smaller generators and to improve the viability of local energy projects, stimulating investment in low carbon energy infrastructure within London.

The preferred option is intended to reflect the aims of the electricity working group, including the additional policies to support the development and delivery of infrastructure and especially to support gas and electricity infrastructure. The alternative option does not include these additional policies. **Table 4.15** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

New policy: Policy 5.4A – Electricity and Gas Supply
Policy to be altered: Policy 8.1 – Implementation

Table 4.15 Assessment of preferred and alternative options

Preferred option	Alternative option
Include additional policies to support the development and delivery of infrastructure and especially to support gas and electricity infrastructure.	Not to include additional policies to support the development and delivery of infrastructure and especially to support gas and electricity infrastructure.
1. Regeneration and Land Use	
This option is likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this	This option is less likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this

Preferred option	Alternative option
option is likely to support regeneration and land use in London. **Minor positive effect.**	option is less likely to support regeneration and land use in London. **Minor negative effect.**
2. Biodiversity	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3. Health and Well-being	
This option is likely to provide a cost efficient and reliable energy supply, which is more likely to help those in fuel poverty and improve health and well-being. In addition, this option is more likely to meet the demand for energy from health services. **Minor positive effect.**	This option is less likely to provide a cost efficient and reliable energy supply, which is less likely to help those in fuel poverty and improve health and well-being. In addition, this option is less likely to meet the demand for energy from health services. **Minor negative effect.**
4. Equalities	
This option is likely to provide a cost efficient and reliable energy supply, which is more likely to help those in fuel poverty. This includes households, including pensioner households, on low income and disabled people. **Minor positive effect.**	This option is less likely to provide a cost efficient and reliable energy supply, which, in turn, is less likely to help those in fuel poverty. This includes households on low income and disabled people. **Minor negative effect.**
5. Housing	
This option is likely to ensure effective development and delivery of the infrastructure needed to support sustainable growth in London. This growth includes housing. **Minor positive effect.**	This option is less likely to ensure effective development and delivery of the infrastructure needed to support sustainable growth in London. This infrastructure includes housing. **Minor positive effect.**
6. Employment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy	
This option is likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this option is likely to support a growing economy. **Minor positive effect.**	This option is less likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this option is less likely to support a growing economy. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
This option promotes the strategic investment in electricity and gas infrastructure. In line with the Mayor's other policies, including 5.1, this will include low and zero carbon infrastructure. Therefore, this option is likely to promote energy efficiency. **Minor positive effect.**	This option does not promote the strategic investment in electricity and gas infrastructure. In line with the Mayor's other policies, including 5.1, this will include low and zero carbon infrastructure. Therefore, this option is likely to be less energy efficient. **Minor negative effect.**
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option
12. Accessibility and Mobility	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
This option is likely to ensure effective development and delivery of more resilient infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this option could promote a perceived sense of place and create vibrant and diverse communities. **Minor positive effect.**	This option is less likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. Therefore, this option is less likely to promote a perceived sense of place and create vibrant and diverse communities. **Minor negative effect.**
15. Open Space	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality	
This option is likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. This is likely to result in fewer developers proposing back-up on-site energy generation, some which may produce emissions of nitrous oxides (NO_X) and particulate matter. **Minor positive effect.**	This option is less likely to ensure effective development and delivery of the infrastructure, in particular electricity and gas infrastructure, needed to support sustainable growth in London. This is less likely to result in fewer developers proposing on-site energy generation, some which may produce emissions of NO_X and particulate matter. **Minor negative effect.**

The preferred option, which encourages the development and delivery of infrastructure, in particular electricity and gas infrastructure, has a positive effect on most of the sustainability objectives. However, the alternative option, which is not as likely to provide the support the development and delivery of infrastructure, has a minor negative effect on most of the sustainability objectives.

Policy Change: Include reference to the Royal Docks, its unique size and potential for regeneration.

The Royal Docks sits in an 'arc of opportunity'; an area running from Stratford down the River Lea to the Thames that has £22 billion of development potential. Investment in this area is an opportunity to offer the chance to change the lives of some of London's most deprived communities. Together with TfL, the Mayor is working to secure joint investment and ensure essential infrastructure is upgraded.

The preferred option updates Policy 7.30, which refers to London's canals and waterways, to make a specific reference to the plans for the Royal Docks. Alternative option A does not include this reference to the Royal Docks, whereas alternative option B looks to implement the same approach to waterspaces more widely. **Table 4.16** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 7.30 – London's Canals and Other Rivers and Waterspaces

Table 4.16 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
Policy update to link to paragraph in the supporting text – Royal Docks.	Do not include update to link to paragraph in the supporting text – Royal Docks.	To apply this additional approach to waterspaces more widely.
1. Regeneration & Land Use		
This option specifically supports the regeneration of the Royal Docks and the surrounding area. Therefore there is more likely to be regeneration benefits for this area. **Minor positive effect.**	This option does not specifically support the regeneration of the Royal Docks and the surrounding area. Therefore there is less likely to be regeneration benefits for this area. **Minor negative effect.**	This option supports the regeneration of waterspaces more widely. Therefore there may be regeneration benefits for these areas. However, it is uncertain whether the waterspaces that will benefit most from regeneration will be targeted. **Minor positive effect.**
2. Biodiversity		
This option specifically states that biodiversity will not be compromised. Therefore it is likely that there will be no significant effects on biodiversity. **No effect.**	**No effects** on the objective are anticipated from this option.	It could be that other waterspaces are more sensitive to development than the Royal Docks and there may be potential for adverse effects on biodiversity. **Uncertain effect.**
3.Health and Well-being		
This option specifically supports the regeneration of the Royal Docks and the surrounding area. In line with other policies given in the Plan, regeneration benefits could include social infrastructure to improve the well-being of existing residents. **Minor positive effect.**	This option does not specifically support the regeneration of the Royal Docks and the surrounding area. Therefore, there is less likely to be regeneration benefits including social infrastructure to improve the well-being of existing residents. **Minor negative effect.**	This option supports the regeneration of waterspaces more widely. Therefore there is likely to be regeneration benefits for these areas. In line with other policies given in the Plan, regeneration benefits could include social infrastructure to improve the well-being of existing residents. **Minor positive effect.**
4. Equalities		
This option specifically supports the regeneration of the Royal Docks and the surrounding area. In line with other policies given in the Plan, regeneration benefits could include social infrastructure to help disadvantaged people. **Minor positive effect.**	This option does not specifically support the regeneration of the Royal Docks and the surrounding area. Therefore, there is less likely to be regeneration benefits including social infrastructure to help disadvantaged people. **Minor negative effect.**	This option supports the regeneration of waterspaces more widely. Therefore there is likely to be regeneration benefits for these areas. In line with other policies given in the Plan, regeneration benefits could include social infrastructure to help disadvantaged. **Minor positive effect.**
5. Housing		
This option specifically encourages the creation of houses in the Royal Docks or the surrounding area. Therefore, it is more likely to support the provision of additional houses. **Minor positive effect.**	This option does not specifically encourage the creation of houses in the Royal Docks or the surrounding area. Therefore, it is less likely to support the provision of additional jobs. **Minor negative effect.**	This option encourages the creation of houses in the areas surrounding other waterspaces. Therefore, it is more likely to support the provision of additional houses. **Minor positive effect.**

Preferred option	Alternative option A	Alternative option B
6. Employment		
This option specifically encourages the creation of jobs in the Royal Docks or the surrounding area. Therefore, it is more likely to support the provision of additional jobs. **Minor positive effect.**	This option does not specifically encourage the creation of jobs in the Royal Docks or the surrounding area. Therefore, it is less likely to support the provision of additional jobs. **Minor negative effect.**	This option encourages the creation of jobs in the areas surrounding other waterspaces. Therefore, it is more likely to support the provision of additional jobs. **Minor positive effect.**
7. Stable Economy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation		
This option specifically states that hydrology will not be compromised. Therefore it is likely that there will be no significant effects on flood risk and climate change adaptation. **No effect.**	**No effects** on the objective are anticipated from this option.	It could be that smaller waterspaces may not be as capable of incorporating flood prevention or mitigation measures as the Royal Docks and could be more sensitive to flooding. **Uncertain effect.**
9. Climate Change Mitigation and Energy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources		
This option specifically states that hydrology will not be compromised. Therefore it is likely that there will be no significant effects on water quality and water resources, **No effect**.	**No effects** on the objective are anticipated from this option.	It could be that other waterspaces are more sensitive to development than the Royal Docks and there may be potential for adverse effects on water quality. **Uncertain effect.**
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
This option specifically seeks to improve the use of and access to the Royal Docks. Therefore this option is likely to improve accessibility and mobility. **Minor positive effect.**	This option does not specifically seek to improve the use of and access to the Royal Docks. Therefore this option less likely to improve accessibility and mobility. **Minor negative effect.**	This option seeks to improve the use of and access to the waterspaces more widely. Therefore this option is likely to improve accessibility and mobility in these areas. **Minor positive effect.**
13. Built and Historic Environment		
This option specifically seeks to maintain the character and distinctiveness of the Royal Docks. **No effect.**	**No effects** on the objective are anticipated from this option.	This option specifically seeks to maintain the character and distinctiveness of waterspaces more widely. **No effect.**

Preferred option	Alternative option A	Alternative option B
14. Liveability and Place		
This option specifically supports the regeneration of the Royal Docks and the surrounding area. The opportunities from this regeneration are likely to improve the liveability of the area. **Minor positive effect.**	This option does not specifically support the regeneration of the Royal Docks and the surrounding area. This option is less likely to result in opportunities from regeneration, which could improve the liveability of the area. **Minor negative effect.**	This option supports the regeneration of waterspaces more widely. The opportunities from these regeneration projects are likely to improve the liveability of these areas. **Minor positive effect.**
15. Open Space		
This option specifically seeks to improve the use of and access to the Royal Docks and protect its openness. **No effect.**	**No effects** on the objective are anticipated from this option.	This option specifically seeks to improve the use of and access to waterspaces and protect their openness. **No effect.**
16. Air Quality		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option is likely to have a positive effect on a number sustainability objectives. However, the option states that *'development...may facilitate transformation, provided that navigation, hydrology and biodiversity are not compromised'*, which has resulted in the policy having no significant effect on biodiversity, flood risk and climate change adaptation, and water quality and water resources. If the policy was more aspirational and encouraged enhancement, as opposed to avoiding compromise, then the policy would be beneficial with respect to these objectives. Alternative option A does not specifically encourage regeneration of the London Docks and thus it does not have positive effects on the sustainability objectives. It is, therefore, recommended that the policy should be altered to say that development should seek to enhance biodiversity. Alternative option C aims to encourage regeneration in the areas surrounding all waterspaces. Whilst this has a positive effect on a number of objectives, there are several objectives, on which the effects are uncertain.

Policy Change: Reflect the current delivery programme for cycle infrastructure.

The proposed change to the policy is aimed at enhancing, promoting and providing cycling infrastructure to address the growing number of cyclists and to further encourage cycling in London. Moreover, the preferred option would update the cycling parking standards. It must be noted that the previous and updated cycling parking standards cannot easily be compared as they use different parameters, i.e. the updated standards make reference to floorspace. For the purpose of this assessment it has been assumed that the updated cycling parking standards would result in at least the same number of parking spaces as per previous standards. Alternative option A would only update the cycling policy but leave current cycling standards unchanged. The policy as well as the cycling parking standards would remain unchanged under option B. **Table 4.17** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 6.9 – Cycling

Table 4.17 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
To update the cycling policy and cycling parking standards.	To update the cycling policy and not change the cycling parking standards.	Not to update the cycling policy and not to change the cycling parking standards.
1. Regeneration & Land Use		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
2. Biodiversity		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being		
Providing cycling routes which meet the needs of cyclists within London is likely to encourage this mode of transport and could have beneficial effects on the objective by encouraging physical activity in everyday lives. This is supported by updating the cycling parking standards, particularly through the distinctions between short- and long-stay parking which could make cycling for customers, clients, messengers, etc. more convenient. This approach includes reference to safe cycling networks/routes. It has consequently been assessed that this approach is likely to have beneficial effects on the objective. **Minor positive effect.**	This approach is likely to encourage cycling by promoting, encouraging and providing safe and attractive cycling routes/networks. However, the policy would not update the cycling standards and would consequently not differentiate between short- and long-stay cycle parking. Subsequently, the benefits resulting from this alteration would be lost. **Minor positive effect.**	Not updating the policy to enhance existing/provide additional safe cycling routes could result in additional pressure on the existing network. This is of particular relevance in the light of the increasing number of cyclist and cycling accidents in London. **Minor negative effect.**
4. Equalities		
Cycling provides an affordable form of transport, particularly for the young. Promoting cycling may also help to open up areas that may otherwise not be very accessible by public transport. **Minor positive effect.**	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
5. Housing		
This option updates the cycle parking requirements for new developments and may result in projects providing more spaces than they otherwise would have. However, it is unlikely that the proposed alteration would have an effect on the viability of housing schemes and this objective. **No effect.**	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option A	Alternative option B
6. Employment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
The approach is likely to encourage the use of sustainable transport, i.e. cycling, mainly through enhancement/provision of existing and additional cycling infrastructure. This is supported by updated cycling parking standards for new developments which are likely to support convenience and make cycling more attractive as a form of transport. This is likely to support London in meetings its greenhouse gas emission targets. **Minor positive effect.**	This approach is likely to encourage cycling and may support London in meeting its emission targets. **Minor positive effect.**	This approach is less likely to encourage cycling as it may result in opportunities for the provision of cycling infrastructure being missed. This may as a consequence result in missed opportunities for the reduction of greenhouse gas emissions. **Minor negative effect.**
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
This approach is likely to encourage cycling and could reduce congestions on cycling ways through the provision of additional infrastructure. Moreover, it is possible that cycling accidents could be avoided through this policy change. **Minor positive effect.**	It is likely that cycling will be encouraged through this approach as it encourages the provision of safe cycling infrastructure. **Minor positive effect.**	This option is likely to result in additional pressure being placed on existing cycling networks and could result in more accidents involving cyclists. **Minor negative effect.**
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
This approach could encourage recreational cycling through the provision of safe and attractive routes. Residents of areas with	This approach is likely to have similar effects as the preferred option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option A	Alternative option B
particularly well-developed and attractive cycling networks are likely to take more cycling tours in their area. This approach makes reference to projects such as 'Mini-Hollands' which are considered to be of particular relevance for this objective. **Minor positive effect.**	**Minor positive effect.**	
15. Open Space		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality		
The approach is likely to encourage the use of sustainable transport, i.e. cycling, mainly through the enhancement/provision of existing and additional cycling infrastructure. This is supported by updated cycling parking standards for new developments which are likely to support convenience and make cycling more attractive as a form of transport. This could reduce the demand for less sustainable methods of transport and result in reduce emissions of pollutants associated with road traffic. **Minor positive effect.**	Similarly to the preferred option it is likely that this approach would have beneficial effects on the objective by supporting sustainable transport. **Minor positive effect.**	It is likely that opportunities to encourage sustainable methods of travel and for subsequent benefits would be reduced through this approach. **Minor negative effect.**

The preferred option would support the enhancement and provision of cycling infrastructure, including the short- and long-stay parking facilities at new developments. This is likely to encourage cycling as a mode of transport which would have beneficial effects on the emission of greenhouse gases and other pollutants associated with road traffic. Moreover, it is likely that this approach will support active lifestyles by encouraging cycling as a mode of travel and making cycling for leisure and recreation more attractive.

4.10 Design

Policy Change: Include references to policy considerations for design, including lifetime neighbourhoods, designing out crime, local character, public realm, safety and security.

Design is important in providing environments that are pleasant, accessible and safe in which Londoners can live, work and visit.

Under to Localism Act 2011, local communities now have new rights and powers to shape new development by preparing neighbourhood plans. The Mayor has published his draft SPG on Character and Context to support local authorities, developers and communities in preparing local plans, master plans and neighbourhood plans. The

London Plan 2011 includes Policy 7.1 setting out the concept of 'lifetime neighbourhoods' to encourage places to be designed to be inclusive regardless of age or disability.

The preferred option is to include policy changes to update and clarify policy consideration for design. The alternative options are not including the policy changes (alternative option B) and only referring to some of the policy changes (alternative option C). **Table 4.18** shows the assessment of potential effects of the preferred and alternative options in the IIA Objectives.

Policies to be altered: Policy 7.1 – Lifetime Neighbourhoods
Policy 7.3 – Designing Out Crime
Policy 7.5 – Public Realm

Table 4.18 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
Include policy changes to update and broaden policy considerations for design	Do not include policy changes to update and broaden policy considerations for design	Only refer to some of these design elements.
1. Regeneration & Land Use		
By considering the policy changes to ensure good design, this option is likely to help regenerate the local area. **Minor positive effects.**	By not considering the policy changes to ensure good design, this option is less likely to help regenerate the local area. **Minor negative effects.**	This option includes some of the policy changes to ensure good design and therefore, is likely to help regenerate the area. However, as only some elements are considered, the benefits are not likely to be as great as the preferred option. **Minor positive effects.**
2. Biodiversity		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being		
This option includes the concept of lifetime neighbourhoods, where people of all ages can, as far as possible, have a choice of infrastructure and services. The principles promote health and social cohesion that would be beneficial to health and well-being. The services that are required may include health services, which could impact positively on health and well-being. **Minor positive effects.**	This option does not include the concept of lifetime neighbourhoods, where people of all ages can, as far as possible, have a choice of infrastructure and services. Therefore, without this concept, and under this option, the required services may be overlooked. The services that are required may include health services, which could result in negative effects on health and well-being. **Minor negative effects.**	This option includes some of the policy changes to ensure good design. However, it is uncertain whether this option will include the concept of lifetime neighbourhoods, where people of all ages can, as far as possible, have a choice of infrastructure and services. It may be that the required services, which could include health services, are overlooked. **Uncertain effect.**
4. Equalities		
This option includes the concept of lifetime neighbourhoods and, therefore, is likely to ensure that buildings and the public realm are suitable for all ages and for people with mobility issues. This could promote equality	This option does not include the concept of lifetime neighbourhoods and, therefore, is less likely to ensure that buildings and the public realm are suitable for all ages and for people with mobility issues. It is unlikely that this	This option includes some of the policy changes to ensure good design. However, it is uncertain whether this option will include the concept of lifetime neighbourhoods, which are likely to promote equality in

Preferred option	Alternative option A	Alternative option B
in communities. **Minor positive effects.**	would promote equality in communities. **Minor negative effects.**	communities. **Uncertain effect.**
5. Housing		
Although there are separate housing policies in the Plan, this option is likely to promote good quality design and provide high quality, secure and accessible housing. **Minor positive effects.**	Although there are separate housing policies in the Plan, this option is less likely to promote good quality design and provide high quality, secure and accessible housing. **Minor negative effects.**	Although there are separate housing policies in the Plan, this option is likely to promote good quality design and provide high quality, secure and accessible housing. However, as only some elements are considered, the benefits are not likely to be as great as the preferred option. **Minor positive effects.**
6. Employment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources		
No significant effects on the objective are anticipated from this option.	**No significant effects** on the objective are anticipated from this option.	**No significant effects** on the objective are anticipated from this option.
11. Waste		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility		
This option includes the concept of lifetime neighbourhoods and, therefore, is likely to ensure that people of all ages can get around neighbourhoods that are well connected. This could promote accessibility and mobility in communities. **Minor positive effects.**	This option includes the concept of lifetime neighbourhoods and, therefore, is likely to ensure that people of all ages can get around neighbourhoods that are well connected. It is unlikely that this would promote accessibility and mobility in communities. **Minor negative effects.**	This option includes some of the policy changes to ensure good design. However, it is uncertain whether this option will include the concept of lifetime neighbourhoods, which are likely to promote accessibility and mobility in communities. **Uncertain effect.**
13. Built and Historic Environment		
This option aims to the ensure the nature and mix of existing and planned infrastructure and services are	This option does not specifically aim to the ensure the nature and mix of existing and planned infrastructure and services are	This option includes some of the policy changes to ensure good design. However, it is uncertain whether this option will aim to

Preferred option	Alternative option A	Alternative option B
complementary. Therefore, it is likely that cognisance will be given to areas of cultural value and character will be conserved. **Minor positive effects.**	complementary. Therefore, it is less likely that cognisance will be given to areas of cultural value and character will be conserved. **Minor negative effects.**	the ensure the nature and mix of existing and planned infrastructure and services are complementary, which is likely to encourage cognisance of cultural value and local character. **Uncertain effect.**
14. Liveability and Place		
This option includes the concept of lifetime neighbourhoods and, therefore, is likely to ensure that people of all ages belong to a cohesive community. **Minor positive effects.**	This option does include the concept of lifetime neighbourhoods and, therefore, is less likely to ensure that people of all ages belong to a cohesive community. **Minor negative effects.**	This option includes some of the policy changes to ensure good design. Encouraging good design is likely to enhance the character of an area. However, as only some elements are considered, the benefits are not likely to be as great as the preferred option. **Minor positive effects.**
15. Open Space		
By considering the policy changes, this option is likely to promote good design and its long term management, which provides high quality public realm associated with development, including the provision of open space. This could increase Londoners; access for recreational purposes and promote urban greening. **Minor positive effects.**	By not considering the policy changes, this option is less likely to promote good design and, thus, may not provide high quality public realm associated with development, including the provision of open space. This could potentially decrease Londoners' access for recreational purposes and promote urban greening. **Minor negative effects.**	This option includes some of the policy changes to ensure good design. However, as only some design elements are considered, it is uncertain whether the requirement for open space will be overlooked in this option. **Uncertain effect.**
16. Air Quality		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option seeks to reflect the latest policy changes in design. This is likely to have a positive effect on most sustainability objectives. Alternative option A may result in the best practice design guidance being ignored and, consequently, it likely to have negative impacts on most of the sustainability objectives. Alternative option B is likely to have a positive effect on regeneration and land use, housing and liveability and place. However, the extent of the effect is not likely to be greater than that of the preferred option. Furthermore, the effects of alternative option B are not know for some sustainability objectives This is because alternative option B only refers to some design elements, which are not known.

4.11 Noise

Londoners are likely to be exposed to higher noise levels due to the density of development, busy roads and number of construction sites. A study from June 2011[10] revealed that approximately 3.2 million Londoners were

[10] GLA, Environment Agency, Natural England, Forestry Commission England (2011) London's environment revealed

exposed to noise levels above 55 dB from road traffic. This is considered to be the level at which the majority of people would experience 'serious annoyance'. Around 29,000 residents are exposed to road traffic noise levels above 75 dB. Exposure to noise from railway affects fewer people with around 453,000 residents exposed to levels above 55 dB and 2,000 people exposed to levels above 75 dB. It must be noted that the report does not state which noise parameter these figures refer to; however, it is assumed to be L_{AeqT}.

The Government published the Noise Policy Statement for England (NPSE) in 2010. The aim of the statement is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion. It also seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. It sets out that the NPSE should apply to all forms of noise including environmental noise, neighbour noise and neighbourhood noise.

The NPPF sets out planning guidance on how to address noise at the strategic level and in planning applications. In line with the EU Environmental Noise Directive – Quiet Areas, the NPPF encourages the identification and protection of areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. These can include Local Green Spaces. The draft NPPG provides more detailed advice on how to consider noise through the planning system including processes for the designation of areas of tranquillity.

Policy Change: Include reference to Explanatory Note to the Noise Policy Statement for England.

The proposed changes are aimed at ensuring that the noise policy in the London Plan reflects national policy and guidance (preferred option). The alternative option would not update the policy.

Table 4.19 shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 7.15 – Reducing Noise and Enhancing Soundscapes

Table 4.19 Assessment of preferred and alternative options

Preferred option	Alternative option
Update the noise policy.	Do not update the noise policy.
1. Regeneration and Land Use	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
2. Biodiversity	
The proposed changes to the policy are aimed at putting more emphasis on the consideration of noise when considering planning applications. Minimising noise from construction and operation of a	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the

Preferred option	Alternative option
development can reduce adverse effects on biodiversity. **No effect.**	London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
3. Health and Well-being	
The proposed changes are aimed at managing noise emissions affecting new developments or emitted by these. Furthermore, the alterations seek to reduce the effects of noise from major sources such as road and rail traffic, air transport and industrial development, on residential areas. Considering noise emissions in line with national legislation and guidance is likely to reduce adverse effects on resident's health and well-being. **Minor positive effect.**	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding strategic planning and planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
4. Equalities	
Emphasizing noise considerations in the planning process is likely to reduce inequalities as it will minimise adverse effects on those who may not be able to avoid noise impacts by their own means e.g. women with children and disabled people tend to stay at home for longer periods; poorer people may not be able to afford to install noise insulation. **Minor positive effect.**	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding strategic planning and planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
5. Housing	
This approach is likely to ensure that housing which ensures a good standard of living without noise related adverse effects is provided. **Minor positive effect.**	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding strategic planning and planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
6. Employment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility	

Preferred option	Alternative option
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
This approach emphasizes the consideration of noise in strategic planning and planning applications and is therefore likely to minimise noise levels and disturbances from noise. **Minor positive effect.**	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding strategic planning and planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
15. Open Space	
This approach is likely to ensure that noise is fully considered in strategic planning and planning applications in line with the EU Environmental Noise Directive – Quiet Areas. This approach can protect identified Quiet Areas which are more likely to be open spaces. **Minor positive effect.**	Without this policy change the Mayor and boroughs would still need to take noise into consideration when regarding strategic planning and planning applications as this is captured in the NPPF. It is possible that the boroughs may not give this issue priority without inclusion in the London Plan. This could limit any encouragement to consider noise issues at an early stage of the planning process and may as a consequence have adverse effects on the objective. **Minor negative effect.**
16. Air Quality	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

The preferred option brings the policy in line with the NPSE as well as the NPPF and is likely to minimise adverse effects on residents from noise emissions. In particular, the emphasis on identifying and protecting quiet space is welcomed. The alternative option would not update the policy to reflect policy changes. The Mayor and boroughs would nonetheless have to consider noise in strategic planning and planning application to meet the requirements of national legislation and guidance. However, it is possible that less priority would be given to this issue as a consequence of this latter approach.

Proposed Policy 7.15 C(a) encourages boroughs to consider the spatial distribution of noise sensitive and noise generating development. It is assumed that this relates to residential development close to roads and railways and some industrial development, however, this seems to conflict with paragraphs B(e) where although layout, distance and screening are preferred to sole reliance on sound insulation, good acoustic design is acceptable where sustainability objectives don't allow for such spatial distribution. Paragraph C(a) also presents a potential impact on mixed use development where by definition the objective would be for residential and commercial uses to be located in close proximity to one another. The emphasis on spatial distribution as the preferred means of noise management also ignores the potential for policies around quiet times, provision of quiet amenity space etc. The draft NPPG makes provision for external noise limits to be relaxed provided that quiet space can be made available for residents, for example through a relatively quiet facade or access to relatively quiet protected private or public

space. It is recommended that this policy is amended to express a hierarchy (or preference) of the measures outlined in Paragraph B(d)(e) and (f) and the draft NPPG, for example:

- Spatial distribution of noise sensitive and noise generating development where this is practicable and desirable with regard to principles of sustainable development;
- Layout, distance and screening of new development to minimise noise impacts;
- Good acoustic design, including sound insulation where external noise levels necessitate this;
- Relaxation of external noise limits where quiet space is made available for residents; and
- Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

4.12 Waste

Defra has released new data for the amount of waste likely to be generated in the future. Projections for London have been developed from Defra's statistics using the GLA's existing methodology for waste projections. These projections will consider the projected increase in businesses and population and assess the amount of land that is likely to be required for the treatment of waste.

Policy 5.17 of the London Plan 2011 aims for a positive carbon outcomes from waste treatment methods and techniques. The Mayor's Municipal Waste Management Strategy sets out how the Mayor aims to shift London's waste from a net emitter of greenhouse gas to a carbon sink. To support this, the Mayor has developed an emissions performance standard which is a metric that considers the overall carbon footprint of waste management activities. The carbon intensity floor sets the minimum CO_{2eq} that can be emitted from turning London's local authority collected waste to energy. This minimum performance, known as the carbon intensity floor, has been set at 400 grams of CO_{2eq} generated per kilowatt hour (kWh) of electricity generated. The Greenhouse Gas Calculator is a free tool that can used to determine the emissions of an authority's unique waste management solutions, based on Waste and Resources Assessment Tool for the Environment (WRATE) lifecycle assessment methodology. The tool also calculates whether the option meet the Mayor's emissions performance standard and carbon intensity floor.

Policy Change: Include CO_2 performance criterion.

The proposed policy change would require that energy generated from London's waste would meet, or have steps in place to meet, a minimum CO_2eq emission performance standard (preferred option). The proposed alternative option A would not include performance criteria waste processing plant. Alternative option B would include more stringent criteria, whilst option C would include less stringent criteria. **Table 4.20** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 5.17 – Waste Capacity

Table 4.20 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B	Alternative option C
Include CO_2 performance criteria for waste processing plant.	Do not include CO_2 performance criteria for waste processing plant.	Include more stringent criteria.	Include less stringent option.
1. Regeneration and Land Use			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
2. Biodiversity			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3.Health and Well-being			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
4. Equalities			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
5. Housing			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
7. Stable Economy			
This approach requires the implementation of CO_2 reducing mechanisms within the waste treatment infrastructure. This is likely to support the development of, and investment into, low carbon industries and technologies. **Minor positive effect.**	In the absence of criteria this approach may result in the uptake of more CO_2 intensive technologies, and hence low carbon industries may experience a decline in support and investment. **Minor negative effect.**	This approach would potentially encourage investment into low carbon industries via the uptake of low carbon technologies. However if criteria are too stringent, the feasibility and cost of implementing these technologies may be too great, and developers may choose not to invest in energy from waste treatment facilities. This could result in a decline in support and	Less stringent criteria would potentially result in some uptake of low carbon technologies and therefore result in some investment into low carbon industries. However if the criteria are very low the effect may not be noticeable. **Uncertain effect.**

Preferred option	Alternative option A	Alternative option B	Alternative option C
		investment to low carbon industries. **Uncertain effect.**	
8. Flood Risk and Climate Change Adaptation			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy			
This approach would ensure that waste treatment facilities operate to a minimum CO_2eq emission performance standard. This is likely to reduce greenhouse gas emissions and contribute towards reaching emission reduction targets while supporting low carbon infrastructure. **Minor positive effect.**	In the absence of criteria this approach may result in the uptake of more CO_2 intensive technologies, and hence there is a possibility that CO_2 emissions would increase as a result. This could furthermore reduce the likelihood of meeting emission targets. **Minor negative effect.**	This approach is likely to ensure that waste treatment facilities operate to a stringent CO_2eq emission performance standard. This would reduce greenhouse gas emissions and contribute towards reaching emission targets while supporting low carbon infrastructure to a greater extent than the preferred option. However if criteria are too stringent the cost of implementing these technologies may be too great, and lead developers to consider energy from waste treatment facilities as infeasible. This would result in a possible increase in greenhouse gas emissions as more energy is sourced from alternative, possibly more carbon intensive sources. **Uncertain effect.**	Less stringent criteria could potentially result in some uptake of low carbon technologies and therefore result in some reduction of greenhouse gas emissions. However if the criteria are very low, the effect on greenhouse gas emissions may not be noticeable. **Uncertain effect.**
10. Water Quality and Water Resources			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
12. Accessibility and Mobility			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.

Preferred option	Alternative option A	Alternative option B	Alternative option C
14. Liveability and Place			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
15. Open Space			
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
16. Air Quality			
In requiring that waste treatment facilities operate to a minimum CO_2eq emission performance standard, this approach is likely to reduce greenhouse gas emissions. **Minor positive effect.**	In the absence of criteria this approach may result in the uptake of more CO_2 intensive technologies, and as a result increase CO_2 emissions. **Minor negative effect.**	This approach could ensure that waste treatment facilities operate to a stringent CO_2eq emission performance standard, and therefore could reduce greenhouse gas emissions to a greater extent than the preferred option. However if criteria are too stringent the cost of implementing these technologies may be too great, and lead developers to consider energy from waste treatment facilities as infeasible. This would result in a possible increase in greenhouse gas emissions as more energy is sourced from alternative, possibly more carbon intensive sources. **Uncertain effect.**	Less stringent criteria could result in some uptake of low carbon technologies and therefore result in some reduction of greenhouse gas emissions. However if the criteria are very low, the effect on emissions may not be noticeable. **Uncertain effect.**

All options have potential effects on the economy through encouraging investment in low carbon technologies as well as on greenhouse gas emissions. The preferred option is likely to have beneficial effects on these objectives by including CO_2 performance criteria for waste processing plant in the policy. Not including this reference could result in the uptake of more carbon intensive technologies (alternative option A). The effect of including more stringent (option B) or less stringent criteria (option C) is uncertain. More stringent criteria could encourage the uptake of less carbon intensive technologies but may reduce feasibility and investment if too stringent. Less stringent criteria could encourage the uptake of carbon friendly technologies but could have an unnoticeable effect on the objective if too slack.

Policy Change: Update the waste projections.

The proposed policy change incorporates updated waste projections for the amount of municipal and commercial/industrial waste produced per annum in each London borough for key milestones until 2036.**Table 4.21** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 5.17 – Waste capacity

Table 4.21 Assessment of preferred and alternative options

Preferred option	Alternative option
Update the waste projections.	Do not update the waste projections.
1. Regeneration and Land Use	
This approach facilitates an increased level of accuracy in determining the amount of land required to treat waste. This is likely to allow for the sufficient, but not excessive safeguarding of land for waste treatment. Where there is surplus land for waste treatment, this land could be released for other purposes, supporting regeneration. **Minor positive effect.**	This approach could result in inaccurate waste projections, which in turn could cause inaccurate amounts of land being apportioned for the treatment of waste. It is likely that less land would be available for regeneration purposes if land is excessively safeguarded for waste treatment purposes. **Minor negative effect.**
2. Biodiversity	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
3. Health and Well-being	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
4. Equalities	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
5. Housing	
Through facilitating accurate allocation of land for waste treatment, this approach is likely to ensure that any surplus land is made available for other purposes, including the provision of housing. **Minor positive effect.**	This approach could result in inaccurate waste projections, which in turn could cause inaccurate amounts of land being apportioned for the treatment of waste. It is likely that less land would be available for the delivery of housing if land is excessively safeguarded for waste treatment purposes. **Minor negative effect.**
6. Employment	
Through facilitating accurate apportioning of land for waste treatment, this approach is likely to ensure that any surplus land is made available for other purposes, including local businesses which in turn have potential to generate employment. **Minor positive effect.**	This approach could result in inaccurate waste projections, which in turn could cause inaccurate amounts of land being apportioned for the treatment of waste. It is likely that less land would be available for employment purposes if land is excessively safeguarded for waste treatment purposes. **Minor negative effect.**
7. Stable Economy	
Updating the waste projections is likely to result in accurate apportioning of land for waste treatment, and hence additional land being identified for other uses such as housing and business. This is likely to reassure and attract investors, stimulating investment in the economy. **Minor positive effect.**	This approach could result in inaccurate waste projections, which in turn would cause inaccurate amounts of land being apportioned for the treatment of waste. It is likely that less land would be available for other purposes which could encourage investment. It is possible that investment in unnecessary facilities is made. **Minor negative effect.**
8. Flood Risk and Climate Change Adaptation	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy	
Updating the waste projections could allow for more accurate planning	Not updating the waste projections could limit the amount of

Preferred option	Alternative option
of waste management and could for example allow for partnerships between boroughs to maximise the efficiency of transport routes. It is also likely to help identify further opportunities for the reduction of emissions by promoting the waste hierarchy. This could result in the reduction of greenhouse gas emissions from waste treatment. **Minor positive effect.**	reasonable opportunities identified for the reduction of greenhouse gas emissions. **Minor negative effect.**
10. Water Quality and Water Resources	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste	
This approach is likely to ensure that waste management is more efficiently planned and that an adequate amount of land is allocated for waste treatment/an adequate number of waste treatment facilities is provided. Updating the waste projections will allow current waste trends to be identified and may result in well planned strategies which recognise current trends and are targeted wisely. **Major positive effect.**	This approach could result in the inaccurate or inefficient planning of strategies and partnerships. Strategies might target the wrong areas and set the wrong priorities as a consequence of this option. This could exacerbate efforts to meet waste targets in line with the waste hierarchy. **Minor negative effect.**
12. Accessibility and Mobility	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment	
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place	
Updating the waste projections is likely to result in accurate apportioning of land for waste treatment and land being released for other uses which may improve the local environment for existing communities. **Minor positive effect.**	This approach could result in inaccurate waste projections, which in turn could cause inaccurate amounts of land being apportioned for the treatment of waste. It is likely that less land would be available for community purposes. **Minor negative effect.**
15. Open Space	
Updating the projections is likely to ensure that land is adequately allocated and could release pressure from less sustainable sites, particularly the Green Belt and open spaces. **Minor positive effect.**	This approach is likely to put unnecessary pressure on less sustainable sites by not releasing land for other purposes such as the development of housing or employment space. **Minor negative effect.**
16. Air Quality	
Updating the waste projections could allow for more accurate planning of waste management and could for example allow for partnerships between boroughs to maximise the efficiency of transport routes. It is also likely to help identify further opportunities for the reduction of emissions by promoting the waste hierarchy. This could result in the reduction of greenhouse gas emissions and other pollutants as a result of waste treatment. **Minor positive effect.**	Not updating the waste projections could limit the amount of reasonable opportunities identified for the reduction of greenhouse gas emissions and other pollutants associated for example with inefficient transport or waste. **Minor negative effect.**

The preferred option is likely support efficient planning of waste management and to allow for sustainable strategic planning and partnerships. This is likely to make a significant contribution to the achievement of waste targets in accordance with the waste hierarchy. Furthermore, this approach is likely to have beneficial effects on a number of

objectives through ensuring that land is accurately allocated, making it possible to release surplus land for other uses. The alternative option would not update waste projections which could result in the inadequate allocation of land and could consequently have adverse effects on several objectives. This approach would also limit sustainable planning of strategies and partnerships.

Policy Change: Bring the waste target dates forward by 5 years.

In 2009/10 the majority of London's waste was landfilled (49%), recycled and composted (27%) or incinerated (21%). The capacity of land fill sites across the UK is becoming limited and costs for the disposal of residual waste are increasing. The main effect of increasing land fill taxes is that the cost for recycling is lower than the cost for the disposal of waste on land fill sites. Generating energy from waste is also becoming increasingly profitable, depending on contractual arrangements. This is a key driver for changing the approach to the management of municipal waste in London.

The proposed alteration is aimed at facilitating the delivery of alternative waste treatment facilities in London to help achieve the overall target of self-sufficiency sooner. This is further aimed at enabling London to take advantage of the value within the waste products, e.g. through recycling and retrieving energy from waste. The preferred option would move the waste target dates forward by 5 years, to 2026. Under alternative option A current waste target dates would remain unchanged (2031), whilst the waste targets would be rolled forward to 2036 under alternative option B. **Table 4.22** shows the assessment of potential effects of the preferred and alternative options on the IIA Objectives.

Policies to be altered: Policy 5.16 – Waste Self-Sufficiency

Table 4.22 Assessment of preferred and alternative options

Preferred option	Alternative option A	Alternative option B
To decrease the target date to 2026.	To retain the target date at 2031.	To increase the target date to 2036.
1. Regeneration and Land Use		
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
2. Biodiversity		
No effects are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.	**No effects** are anticipated on the objective from this option.
3.Health and Well-being		
This approach requires an increased amount of waste to be treated within London by 2026. As a result increases in nuisance and air pollution (most likely from traffic movements),are possible within London Boroughs from an increased number of waste treatment facilities. These in turn can reduce the sense of well-being in a	No change in odour, noise or air pollution is anticipated in the short and medium term as a result from this option. It is possible that health and well-being will be affected once all of London's waste is treated within the capital. This option would delay the effects. **No effect/minor negative effect.**	This approach is not likely to influence health and well-being of Londoners in the short and medium term. However, this option would delay the effects of treating waste within London. **No effect/minor negative effect.**

Preferred option	Alternative option A	Alternative option B
community. **Minor negative effect.**		
4. Equalities		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
5. Housing		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
6. Employment		
This approach is likely to result in an increase in locally available jobs associated with waste management in London. However a reduction in the number of jobs available within the wider region may be felt as waste treatment switches to be London based. **Minor positive effect/minor negative effect.**	This approach is likely to have similar effects as the preferred option, however, the effects would be delayed. **No effect/minor negative effect.**	This approach is likely to have similar effects as the preferred option, however, the effects would be delayed. **No effect/minor negative effect.**
7. Stable Economy		
This approach would enable London to take advantage of the economic value of waste, as opposed to shipping it overseas. Treating waste within London is likely to have effects on the London economy for example as locally available jobs may increase and the value of some areas may be changed through the presence of waste treatment facilities. However, it is uncertain how the local and wider economy may be affected from this option. Furthermore, businesses may experience effects from moving waste targets forwards, for example through potentially reduced waste disposal costs as a consequence of increased recycling rates. **Minor positive effect/uncertain effect.**	The effects of this approach are likely to be similar to the effects of the preferred option but would be delayed due to the later target date. **Uncertain effect.**	The effects of this approach are likely to be similar to the effects of the preferred option but would be delayed due to the later target date. **Uncertain effect.**
8. Flood Risk and Climate Change Adaptation		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
9. Climate Change Mitigation and Energy		
This approach is likely to result in an earlier reduction of waste going to landfill. It is likely that this will positively impact the emissions of greenhouse gasses from the waste sector by reducing the amount of CH_4 emitted into the atmosphere from waste treatment. Additionally by treating waste locally, emissions from waste vehicles may be	This approach will delay the benefits of diverting waste from landfill and has consequently been assessed as having adverse effects on the objective, particularly when considering the need for a timely reduction of greenhouse gases to limit the effects of climate change. **Minor negative effect/minor positive**	This approach will delay the benefits of diverting waste from landfill and has consequently been assessed as having adverse effects on the objective, particularly when considering the need for a timely reduction of greenhouse gases to limit the effects of climate change. **Minor negative effect/minor positive**

Preferred option	Alternative option A	Alternative option B
reduced. **Minor positive effect.**	**effect.**	**effect.**
10. Water Quality and Water Resources		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
11. Waste		
This approach is likely to support London in reaching national and local waste targets, such as those outlined in the Mayor's Municipal Waste Management Strategy[11]. This is likely to align the treatment of waste with the waste hierarchy at an earlier stage. **Minor positive effect.**	This approach is likely to have similar effects on the objective as the preferred option. However, it will delay the benefits of reaching current waste targets and has subsequently been assessed to have a minor negative effect on the objective in the short and medium term. **Minor negative effect/minor positive effect.**	This approach is likely to have similar effects on the objective as the preferred option. However, it will delay the benefits of reaching current waste targets and has subsequently been assessed to have a minor negative effect on the objective in the short and medium term. **Minor negative effect/minor positive effect.**
12. Accessibility and Mobility		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
13. Built and Historic Environment		
No effects on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.	**No effects** on the objective are anticipated from this option.
14. Liveability and Place		
This approach requires an increasing amount of waste to be treated within London by 2026. As a result increases in nuisance and air pollution are possible, mainly from increased transport, rather than from waste treatment facilities, where well designed. The presence of waste treatment facilities within London may reduce the amount of available space for other purposes such as recreational, leisure and cultural activities. **Minor negative effect.**	This approach is likely to have similar effects as the preferred option, however, the effects are likely to be delayed. **No effect/minor negative effect.**	This approach is likely to have similar effects as the preferred option, however, the effects are likely to be delayed. **No effect/minor negative effect.**
15. Open Space		
By increasing efforts to meet waste targets sooner, this approach is likely to reduce the amount of waste to landfill and could free up open spaces allocated for the treatment of waste. However, it is possible that the provision of waste facilities within London may require development on unsustainable sites. The effects of this approach on the objective are uncertain at this stage of the	This approach is likely to have similar effects as the preferred option, however, the effects are likely to be delayed. **Uncertain effect.**	This approach is likely to have similar effects as the preferred option, however, the effects are likely to be delayed. **Uncertain effect.**

[11] Mayor of London (2011) *London's Waste Resource – The Mayor's Municipal Waste Management Strategy.*

Preferred option	Alternative option A	Alternative option B
appraisal. **Uncertain effect.**		
16. Air Quality		
This approach is likely to reduce the amount of waste to landfill, which could positively impact the emissions of greenhouse gasses from the waste sector. Additionally by treating waste locally, emissions from waste vehicles could be reduced. However there may be locally felt increases in air pollution as a result of increased vehicle movements to and from waste treatment facilities. **Minor positive effect/minor negative effect.**	This approach is likely to have similar effects as the preferred option, however the effects would be delayed. **Minor positive effect/minor negative effect.**	This approach is likely to have similar effects as the preferred option, however the effects would be delayed. **Minor positive effect/minor negative effect.**

The preferred option is likely to bring the benefits and disadvantages of treating waste within London forward, whilst both alternative options would delay effects on the objective. The waste targets are generally aimed at reducing the environmental impact of waste, waste treatment and waste management on the environment but may have localised adverse effects, within London or the wider region

5. Conclusion

5.1 Key Findings from the IIA

The key outcomes of the draft FALP include an increased focus on housing delivery (including affordable housing), an emphasis on creating employment opportunities through the delivery of new infrastructure and an increased focus on the development of opportunity areas and town centres. Other key outcomes include support for gas and electricity infrastructure and a greater flexibility on car parking in town centres.

Commentary on the sustainability effects of the draft FALP are provided throughout the assessment in Section 4. The following commentary provides a summary of the key effects of the alterations.

5.1.1 Summary of key effects

London's population has increased by over 80,000pa over the past ten years. This was significantly more than predicted when the London Plan was last reviewed. This increase was driven by a natural population growth and more people deciding to stay in London to raise families. For various reasons, including a downturn in the economy and the housing market, the existing housing targets to increase supply and provide more affordable housing have not been met for a number of years. The proposed alterations seek to this shortfall as well as future housing demand. However, given the increase in London's population, and therefore increased housing demand has deviated from historic trends it is considered appropriate to take a precautionary approach to any proposed change in the spatial development of London. To date the London Plan has been reviewed regularly and a future review will identify whether the population growth is due to a structural change or a short term change due to the economic down turn.

The shortage of housing has a range of social, economic and environmental consequences, including on affordability, homelessness, overcrowding and poverty. These issues may affect particular groups disproportionately, for example, older Londoners or those on lower incomes. The London Plan can only provide the policy framework to encourage new housing. The implementation depends on other factors (including the policy framework set by the *draft London Housing Strategy* (November, 2013) and developers' investment considerations). However, the increased emphasis on delivering new housing (especially affordable housing) in the alterations is welcomed. It should help to address the housing shortfall, create employment and regenerate areas.

There are potential adverse effects associated with the provision of new housing. These include increased pressure on existing services (e.g. transport and health care) and facilities (e.g. water resources, energy supply and sewage capacity). There is also increased pressure on green and open spaces. These potential effects are to some extent addressed by:

- **Existing policies in the London Plan:** particularly those policies in Chapter 5 (London's Response to Climate Change) and Chapter 7 (London's Living Places and Spaces). For example, those policies that encourage high quality design (Policy 3.5), sustainable design (Policy 5.3), minimising carbon dioxide emissions (Policy 5.2) and biodiversity and access to nature (Policy 7.19).

- **Proposed further alterations**: for example, those that encourage a step-change in cycling provision to support the growing number of cyclists (Policy 6.9), promote good public transport accessibility, focus development on town centres (Policy 2.15) and Opportunity Areas and encourage investment in new infrastructure (para 4.4A), and

- **Clarifications to existing policies or supporting text**: for example, those that encourage new development to be water efficient and for existing homes and workplaces to become more water efficient (para 5.61).

The assessment of the draft FALP has found the alterations to be broadly positive when considered against the IIA sustainability objectives. Indeed, people that live in cities often use more public transport, live in higher density homes with lower energy consumptions, and have lower car ownership. It follows that if we can manage and accommodate this growth within London, it will contribute towards sustainable development. However, it must be noted that there is a high level of uncertainty associated with the population projections and the Plan should continue to be regularly reviewed and monitored (see **Section 5.2**).

During the preparation of the IIA a number of comments were provided on early drafts of the alternations. Some of these are included in **Appendix G**, alongside the response of clarification provided by the GLA. This IIA recommends minor amendments to the policies on noise and infrastructure.

5.1.2 Cumulative effects and effects outside of London

Cumulative effects may occur as a result of multiple policy alterations or in combination with the effects of other plans and programmes. Where a number of policies are focussed on one area, such as town centres, inner/outer London or Opportunity Areas, there may be effects on that area from all the policy alterations together. Cumulative effects may also arise from the consideration of the implementation of other plans and programmes. The matrix within **Appendix H** sets out the effects of each of the policy groups against the IIA objectives. The majority of scores are 'minor positive' with some 'major (significant) positive' scores. These are unlikely to cumulatively result in any significant positive effects that have not already been identified. There are 4 'minor negative' scores and no 'major (significant) negative' effects. Again, it is unlikely that cumulatively there will be any significant negative effects.

Planning policy for London may have effects beyond London. Indeed, building new homes in Greater London may mean new homes are not being built in areas outside of London, for example, in Kent or Essex. New homes in London may be smaller (more energy efficient) and built within existing urban areas (with good access to existing services and facilities) when compared to homes built outside of London that may be larger and built on greenfield sites. This may suggest that building more homes in London is more sustainable than meeting that demand in other

parts of the UK (when that demand in not also within cities). However, this analysis is beyond the scope of this report and the relationship between supply and demand is very complex with numerous uncertainties.

5.2 Monitoring

It is a requirement of the SEA Directive to establish how the significant effects of implementing the FALP replacement will be monitored. However, as ODPM Guidance[12] (ODPM, 2005) notes, '*it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects'*.

Monitoring should therefore be focussed upon significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused (or uncertain effects where monitoring would enable preventative or mitigation measures to be undertaken).

The London Plan recognises '*that in a city as dynamic as London it is impossible to anticipate all the ways in which change will happen…* and that *it is vital that we can adjust, especially to changes that could give rise to re-consideration of the Plan's direction or policies…'*. In this way the Plan recognises the importance of the Plan-Monitor-Manage process (para 8.8).

There are 24 key performance indicators that are monitored annually and reported in the Annual Monitoring Report (AMR). The AMR is a key element in the Plan – Monitor- Manage cycle and provides a wide range specific development monitoring reports for London. Previous AMRs have been an important factor in the formation of the replacement London Plan and the Mayor will use future AMRs to monitor the impact of the London Plan and ensure that it is kept up to date and relevant.

Two key performance indicators are being revised as part of the FALP, they include:

- KPI 4 - Increase the supply of new homes: Average completion of a minimum of 42,000 net additional homes
- KPI 5 – An increased supply of affordable homes: Completion of 16,000 net additional homes per year.

[12] Practical Guide to the Strategic Environmental Assessment Directive *(ODPM, September 2005).*

5.3 Quality Assurance

A quality assurance checklist has been prepared and is presented in **Appendix F**, highlighting compliance with the SEA Directive.

5.4 Next Steps

This IIA Report is issued for consultation alongside the draft FALP. Consultation will last for 12 weeks from **15th January 2014** to **10th April 2014**. Following receipt of comments on the draft FALP and the IIA Report, an Examination in Public (EIP) will be carried out in autumn 2014. The EIP Inspector will make recommendations to the Mayor. Following consideration of these recommendations, the Mayor will inform the Secretary of State for Communities and Local Government that he intends to publish the new FALP. Following approval from the Secretary of State, the Mayor will submit the 'intend to publish' FALP to the London Assembly for their consideration. The Assembly then has 21 days within which it can reject the alterations by a two thirds majority if it so wishes.

Appendix A
List of Abbreviations

BPG	Best Practice Guidance
CAZ	Central Activities Zone
CsIA	Community Safety Impact Assessment
EA	Environment Agency
EMA	Early Minor Alterations
FALP	Further Alterations to the London Plan
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
LSDC	London Sustainable Development Commission
ONS	Office for National Statistics
PTAL	Public Transport Accessibility Level
REMA	Revised Early Minor Alterations
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SPG	Supplementary Planning Guidance
TfL	Transport for London

Appendix B
Reviewed Plans and Programmes

The following is a list of the plans, programmes and strategies that have been reviewed as part of this IIA.

General
Summary: These documents set out the international framework for sustainable development. These documents set the legislative and the broad framework for planning and sustainable development in the UK, England and specifically London. The Government has introduced and is introducing further guidance to liberalise and streamline the planning system. Key documents include the National Planning Policy Framework which introduced a presumption in favour of sustainable development. These documents set out the sustainability, legal and policy context for the alterations. In general they promote sustainable development to encourage growth and meet the needs of the local population.
• Strategic Environmental Assessment Directive 2001 • Great London Authority Act 2007. HM Government (2007) • Greater London Authority Act 1999. HM Government (1999) • The Planning and Compulsory Purchase Act. HM Government (2004) • The Planning Act 2008. HM Government (2008) • The Community Infrastructure Levy. Communities and Local Government (August 2008) • The Community Infrastructure Levy (Amendment) Regulations (2011) and (2012) • Localism Act 2011. HM Government (2011) • The Neighbourhood Planning (General) Regulations. HM Government (2012) • Growth and Infrastructure Act. HM Government (2012) • The National Planning Policy Framework. Communities and Local Government (2012) • National Planning Policy Framework Technical Guidance. DCLG (2012) • Draft National Planning Practice Guidance. Communities and Local Government (2013) • Mainstreaming sustainable development: the government's vision and what this means in practice. Defra (2011) • Securing the future: the UK Government sustainable development strategy. Office of the Deputy Prime Minister (2005) • The World Summit on Sustainable Development – Commitments arising from Johannesburg Summit. United Nations (2002) • Future We Want – Outcome document. UN Conference on Sustainable Development (2012) • A sustainable development framework for London. London Sustainable Development Commission. Greater London Authority (2003) • The London Plan. The Mayor of London (2011) • The Mayor's 20:20 Vision. The Mayor of London (2013) • The Mayor's Supplementary Planning Guidance (various) • Annual Monitoring Report 9. Mayor of London. 2013. • London Plan Implementation Plan 1. Mayor of London. 2013.
London's Places
Summary: The Government has introduced and is introducing further guidance to liberalise and streamline the planning system in order to stimulate town centres and encourage economic growth as well as increase the supply of housing. There is a current strong focus on improving struggling town centres and high street, including by perhaps encouraging more housing. The Mayor and the London Boroughs play a strong role in shaping their areas through borough development plan documents,

and the Mayor through plans for opportunity areas, that are produced in conjunction with the relevant borough.

These documents support the alterations through their support for shaping places to meet local demand and encourage regeneration. There has been strong recent focus on 'saving the High Street' and the proposed alterations also seek to ensure the proactive management of town centres, including through consolidation of existing floorspace and the delivery of housing both in Inner and Outer London.

- Supporting communities in neighbourhood planning 2013 to 2015. DCLG (2013)
- Greater flexibilities for change of use. Consultation. DCLG (2013)
- Change of use from offices to residential. DCLG (2013)
- English housing survey 2011 to 2012: headline report. DCLG (2013)
- Strategic Housing Land Availability Assessment and Housing Capacity Study 2009 – Report of Study. Greater London Authority, 2009
- The Mayor's Outer London Commission: Report. GLA (2010)
- The Vanishing High Street. Bill Grimsey (2013)
- Get the green space you want: How the Government can help. Localism Act 2011. DCLG (2011)
- Culture on the High Street. GLA (2013)
- Planning for school development: statement. DCLG (2011)
- Borough Development Plan Documents (various)
- Opportunity Area Planning Frameworks (various)

London's People

Summary: These documents provide the national and London framework for housing development, including affordable housing, as well as housing investment and ways of delivering more housing.

These data and documents provide the evidence base to inform the growth that the alterations will have to plan for both in terms of overall population growth, types of population growth, specific needs of the local population as well as the projected number and types of homes required and supporting infrastructure.

These documents support the alterations by providing guidance on how to address and plan for housing demand, including the types of housing that are required over the lifetime of the plan, whilst ensuring policies are viable and deliverable. They promote high quality sustainable housing which is an essential part of the alterations given that housing in London tends to be delivered at a higher density.

- GLA Population Projections 2012 Round, Trend Based, Borough SYA. GLA (December 2012)
- 2011 Mid-Year Population Estimates. GLA (September 2012)
- London Housing Strategy – draft for consultation. GLA (2012)
- London Housing Strategy. GLA 2010
- Housing in London: the evidence base for the London Housing Strategy. Greater London Authority (2012)
- Housing Standards Review Consultation. DCLG (2013)
- Housing Standards Review: Towards more Sustainable Homes. DCLG (2013)
- Greater London Strategic Housing Market Assessment 2008. Greater London Authority, 2009.
- Mayor's Housing Investment Taskforce Report. Greater London Authority, 2011.
- Affordable Homes Programme Framework. Homes and Communities Agency, February 2011.
- London Assembly Planning & Housing Committee. Crowded houses. Overcrowding in London's social rented housing. GLA, 2011.
- Making London better for all children and young people: the Mayor's children and young people's strategy. Greater London Authority (2004)
- Migration Indicators: June 2013. GLA (2013)
- The London Plan: Ethnic Group Population Projections GLA (2010)

- Planning policy for traveller sites. DCLG (2012)

London's Economy

Summary: These reports provide an update on the economic conditions and forecasts for London. They provide an important understanding of how much employment space and what type of employment will be required in London. They also outline the needs of the range of industries in London.

These documents support the alterations by identifying how much employment and retails floorspace is required. They also set out the changing demands by the various office and retail sectors, encouraging some flexibility and a proactive approach to planning for employment and retail floospace.

- London's Economic Outlook: Spring 2013, GLA (2013)
- Raising the capital. London Finance Commission (2013)
- Jobs and Growth Plan for London. GLA (2013)
- Understanding the demand for and supply of visitor accommodation in London to 2036. GLA (2013)
- London's Low Carbon Market Snapshot – 2013. London's Low Carbon and Environmental Goods and Services – Updated Report. kMatrix. 2013.
- Public Spending Priorities in London. GLA (2010)
- London Labour Market projections. GLA (2013)
- Labour Flows in London. GLA (2011)
- Barriers to Housing Delivery. GLA (2012)
- London Office Policy Review 2012. Ramidus Consulting Limited with Roger Tym & Partners (2012)
- London industrial land demand and release benchmarks. Roger Tym & Partners with Jones, Lang LaSalle (2011)
- London Industrial Land baseline URS, DTZ (2010)
- The Mayor's Economic Development Strategy for London, GLA (2010)
- PayCheck 2010. GLA (2010)
- More residents, more jobs? The relationship between population, employment and accessibility in London. GLA (2005)
- Regeneration, competitiveness and sustainable development. GLA (2004)
- Delivering Power: The Future of Electricity Regulation in London's Central Business District. South East Economics and Stephen Jones Associates. 2012.
- London Electricity High-level Working Group, Meeting papers. 2012-2013.
- Simplification Plan 2012-2013 Ofgem 2012.
- Find out how we're keeping your lights on ... Our Plan for 2015-2023. UKPN 2013.

London's Response to Climate Change

Summary: These documents represent the wide variety of international, European and UK laws and agreements on different aspects of the environment, including nature conservation. The reports and programmes on energy and carbon dioxide indicate the wide range of work the Government and the Mayor are doing to ensure appropriate energy infrastructure, reduce carbon dioxide emissions, retrofit energy efficiency measures which in turn have wider benefits such as improving air quality and addressing fuel poverty.

There are numerous reports on the water environment including ensuring London has an adequate water supply and the existing supply is used wisely, preventing flooding from all sources and improving water quality.

The documents also outline strategies and measures to address pollution including air, water, light and waste to protect the environment and health.

These documents support the proposed alterations by setting out the revised waste projections and setting out a framework for the provision of infrastructure. There are limited proposed alterations to the Climate Change policies in the Plan.

- Natural Environment and Rural Communities Act (2006)
- UK Climate Projections 2009. DEFRA. 2010

- Changes to Park L of the Building Regulations. DCLG (2013)
- Planning practice guidance for renewable energy. DCLG (2013)
- The Carbon Plan – reducing greenhouse gas emissions. DECC (2013)
- The future of heating: a strategic framework for low carbon heat. DECC (2012)
- Next steps to zero carbon homes: allowable solutions. DCLG (2013)
- Zero-carbon non-domestic buildings: phase 3 final report. DCLG (2011)
- Energy Act. HM Government (2011)
- Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy. GLA (2011)
- Evidence Base: Climate Change in the Further Alterations to the London Plan. GLA (2007)
- Microgeneration strategy. DECC (2011)
- Energy Planning – Monitoring the impact of London Plan Energy Policies in 2010. GLA (2011)
- Cutting the Capital's Carbon Footprint – Delivering Decentralised Energy. London First, Buro Happold. 2008
- Impact of London Plan on Energy Policies. Southbank University (2009)
- District Heating Manual for London. GLA (2013)
- London Decentralised Energy Capacity Study – Phases 1, 2, 3. GLA (2011)
- RE:FIT. Mayor of London (ongoing)
- RE:NEW. Mayor of London (ongoing)
- DEPDU Programme. Mayor of London (ongoing)
- The Green Deal. Government Programme (ongoing)
- The Water Framework Directive. European Commission (2000)
- The Floods and Water Management Act. HM Government (2010)
- Water stressed areas: 2013 classification. DEFRA & EA (2013)
- Catchment Based Approach 2100 (TE2100). EA (2012)
- National policy statement for waste water. DEFRA (2012)
- UK marine policy statement. DEFRA (2011)
- The marine planning system for England. DEFRA (2011)
- Thames Tunnel: strategic and economic case, costs and benefits. DEFRA (2011)
- Surface water management plan technical guidance. DEFRA (2010)
- Water for people and the environment – Water resource strategy for England and Wales. EA (2009)
- Water for live and livelihood. River Basin Management Plan Thames River Basin District. EA (2009)
- Securing London's water future: The Mayor's Water Strategy. GLA (2011)
- The London Catchment Abstraction Management Strategy. EA (2006)
- Making space for water: taking forwards a new government strategy for flood and coastal erosion risk management in England. DEFRA (2005)
- Thames Catchment Flood Management Plan. EA (2008)
- The London rivers actions plan. The River Restoration Centre (2009)
- Draft Water Resource Management Plan. Thames Water (2013)
- Affinity Water. Our Plan for Customers & Communities. Draft Water Resource Management Plan (2013)
- Drain London Programme. GLA (ongoing)
- Ramsar Convention on Wetlands of International Importance, especially waterfowl habitat (1971)
- Bern Convention on the Conservation of European Wildlife and Natural Habitats. European Community (1979)
- Directive on Conservation of Wild Birds. European Commission (1979)
- Habitats Directive 1992
- Conservation of Natural Habitats and Wild Fauna and Flora (the Habitats Directive). European Commission (1992)
- Wildlife and Countryside Act (1981)
- Habitats and Wild Birds Directives: Simplification of guidance in England. DEFRA (2012)
- Biodiversity 202: A strategy for England's wildlife and ecosystem services. DEFRA (2011))

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- Working with the grain of nature: a biodiversity strategy for England. DEFRA (2002)
- Development Plan Policies for Biodiversity: Best Practice Guidance of the London Plan. GLA (2005)
- Connection with London's nature: the Mayor's Biodiversity Partnership (ongoing)
- Waste Framework Directive 2008
- The Landfill Directive. European Commission (1999)
- The Landfill (England and Wales) Regulation (2002)
- Updated national waste planning policy: planning for sustainable waste management – consultation. DCLG (2013)
- Local Authority Collected Waste Generation from 2000/01 to 2011/12 (England and regions data). DEFRA (2013)
- Local Authority Collected and Household Waste Statistics 2011 to 2011. DEFRA (2013)
- Commercial and Industrial Waste Survey 2009. Final Report. Jacobs, DEFRA (2010)
- Waste Strategy for England. DEFRA (2008)
- Making Business Sense of Waste: The Mayor's Business Waste Management Strategy. GLA (2011)
- London's Wasted Resource: The Mayor's Municipal Waste Management Strategy. GLA (2011)
- Managing risks and increasing resilience: the Mayor's climate change adaptation strategy. GLA (2011)
- Greenhouse Gas Calculator for Municipal Waste. User Manual. SLR for GLA (2011)
- Capital Clean-up Programme. Mayor of London (ongoing)
- State of the Environment report for London. GLA, EA, NE, The Forestry Commission (2011)
- Stern Review – The Economics of Climate Change. Chancellor of Exchequer (2006)
- Rio Earth Summit, Agenda 21, Chapter 9: Protection of the atmosphere. UNCED (1992)
- The UN Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol. United Nations (1999)

London's Transport

Summary: These reports and strategies set out national policies and the Mayor's priorities with regards to transport. They provide baseline information on transport.

These documents support the alterations as they set out the Mayor's ambitions and priorities for cycling in London as well as large scale infrastructure required to support sustainable growth.

- Aviation policy framework. Department of Transport (2013)
- Delivering a Sustainable Transport System. Department for Transport (2006)
- Towards a Sustainable Transport System: Supporting economic growth in a low carbon world. Department for Transport (2006)
- Eddington Transport Study – Advice to Government. Department of Transport (2006)
- Mayor's vision for cycling. GLA (2013)
- Safeguarded Wharves Review. Final Recommendation. Mayor of London (2013)
- River Action plan. Mayor of London, TfL (2012)
- Cycling Revolution London. TfL (2010)
- Town centre study. TfL (2011)
- A new airport for London – Part 1 and Part 2. GLA (2011)
- The Right Direction. The Mayor's strategy to improve transport safety and security 2010-2013. GLA (2011)
- Mayor's Transport Strategy. GLA (2010)
- Travel in London. Report 3. TfL (2010)
- Transport for London Business Plan 2009/10 – 2017/19. TfL (2009)
- Cycle safety action plan 2010. TfL (2010)
- Residential Parking Provision in New Developments. Travel in London Research Report. TfL (2012)
- The relevance of parking in the success of urban centres. A review for London Councils. Sophie Tyler, Giles Semper, Peter Guest & Ben Fieldhouse (2012)

London's Quality of Life

Summary: These strategies promote improvement in various areas that will lead to the improvement in the quality of life of Londoners, including air quality, health, sport, equality, education, high quality of housing.

These documents support the alterations by setting out the priorities for social infrastructure to ensure growth is sustainable and designed to a high quality.

- Sustainable Communities Act 2007. HM Government (2007)
- Mixed Communities Initiative. DLCG (2011)
- Air Quality Framework Directive. European Commission (1996)
- Draft noise action plan. DEFRA (2013)
- Sounder city: the Mayor's ambient noise strategy. GLA (2004)
- The air quality strategy for England, Scotland, Wales and Northern Ireland. Working together for clean air. DETR (2000)
- Air pollution in the UK 2011. DEFRA (2012)
- Mayor's Air Quality Strategy. GLA (2010)
- Ancient Monuments and Archaeological Areas Act (1979)
- The Planning (Listed Buildings and Conservation Areas) Act. HM Government (1990)
- World Heritage for the Nation: Identifying, Protecting and Promoting Our World Heritage. Department for Culture, Media and Sport (2010)
- Heritage Protection for the 21st Century: White Paper. Department for Culture, Media and Sport (2008)
- Heritage Counts 2012. English Heritage (2012)
- London view management framework: supplementary planning guidance. GLA (2011)
- Capital Values: the Contribution of the Historic Environment to London. London Historic Environment Forum (2006)
- Mayor's Cultural Strategy. GLA (2010)
- Countryside and Rights of Way Act (2000)
- A sporting future in London. GLA (2009)
- London's Great Outdoors Programme. Mayor of London (ongoing)
- Capital Growth Programme. Mayor of London (ongoing)
- The Mayor's food strategy. GLA (2006)
- The London Health Inequalities Strategy. GLA (2010)
- Joint Strategic Needs Assessment and Joint Health and Wellbeing Strategies – statutory guidance. Department of Health (2013)
- Fair London. Healthy Londoners? London Health Commission (2011)
- Mayor of London. Takeaways Toolkit. GLA (2012)
- Health: Children and Young People. Meeying Lam and Allen Baker, London Health Observatory (2010)
- Lifetime neighbourhoods. DLCG (2011)
- Do the Maths: Tackling the Shortage of School Places in London, London Councils (2013)
- Mayor's Education Inquiry Report and Mayor's Response to Report (2012)
- Academies Act 2010. Department of Education (2010)
- Valuing Older People: The Mayor's Older People Strategy. GLA (2006)
- Summary of Social Trends 2008. GLA (2008)
- Regeneration, competitiveness and sustainable development. GLA (2004)
- Poverty: The Hidden City. Rachel Leeser. GLA (2011)
- Poverty figures for London 2011/12. GLA (2013)
- Equal Life Changes for All. The Mayor's Equality Framework. GLA (2012)
- Mayor's Annual Equality Report 2011/2012. GLA (2013)
- London Legacy Development Corporation. Inclusive Design Strategy. LLDC (2012)

- London Legacy Development Corporation. Inclusive Design Strategy. LLDC (2013)
- Annual London Survey 2011. GLA (2011)
- Planning (Hazardous Substances) Act 1990. HM Government 1990.
- PADHI. (Planning Advice for Development near Hazardous Installations) HSE's land use planning methodology. Health and Safety Executive (2012)
- English Heritage (2005) Guidance for best practice for treatment of human remains excavated from Christian burial grounds in England.

Appendix C
Assessment of Equalities Effects

The Mayor and GLA have "general public body duties" under equalities legislation and like all public bodies, have statutory duties to promote equality arising from the Equality Act 2010. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended).

The Equality Act 2010 brings together and replaces all the previous discrimination legislation. The Act contains a new single public sector equality duty ("the Duty") which brings together the previous race, disability and gender duties to the following:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation and
- marriage and civil partnership (applicable only to the need to eliminate unlawful discrimination)

These are the grounds upon which discrimination is unlawful and are referred to as 'protected characteristics.' Section 149 (Public sector equality duty) of the Act states:

1. A public authority must, in the exercise of its functions, have due regard to the need to:
   a) **Eliminate discrimination, harassment and victimisation** and any other conduct that is prohibited by or under this Act
   b) **Advance equality of opportunity** between persons who share a protected characteristic and persons who do not share it
   c) **Foster good relations** between **people** who share a relevant protected characteristic and persons who do not share it
2. A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1)
3. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –
   a) **Remove or minimise disadvantages** suffered by persons who share a relevant protected characteristic that are connected to that characteristic

b) **Take steps to meet the needs of people** who share a relevant protected characteristic that are different from the needs of people who do not share it

c) **Encourage persons** who share a protected characteristic **to participate in public life or in any other activity** in which their participation by such persons is disproportionately low

4. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities
5. Having due regard to the need to **foster good relations** between persons who share a protected characteristic, and those who do not share it involves having due regard, in particular to the need to-

    a. Tackle prejudice
    b. **Promote understanding**

6. Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitted conduct that would otherwise be prohibited by or under this Act.

Commentary / Assessment

With regards to equalities, planning can have the most influence on elements 2 (a) and (b) of the Equalities Act 2010.

3. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –

    a) **Remove or minimise disadvantages** suffered by persons who share a relevant protected characteristic that are connected to that characteristic

    b) **Take steps to meet the needs of people** who share a relevant protected characteristic that are different from the needs of people who do not share it

This is because planning has the greatest influence on the physical environment that can facilitate people to move within their environment, including around their home, place of employment and local community and to and from these places. Planning also influences land use, including ensuring a variety of suitable land uses and affordability of the use, both housing and employment space.

Key issues

In relation to equalities, the key issues in London include:

- housing,
- accessibility
- meeting the cultural needs of a diverse population
- meeting the social needs of a diverse age range
- crime and perception of safety

- employment

The Scoping Report defines 16 sustainability objectives for the IIA, of which one is specifically related to equalities:

' To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together".

Some of the key challenges for the support of equalities in London are summarised in **Table C1**.

Table C1 Key challenges for equalities in London

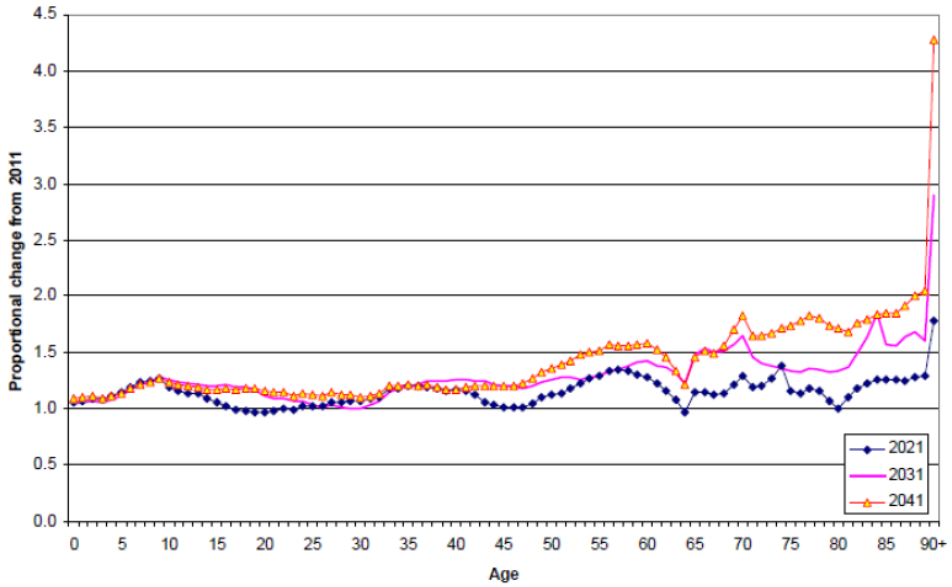
Issue	Commentary
Health inequalities in London	Compared to London as a whole, people living in the most deprived areas have lower life expectancy, can expect to live fewer years without disability, are more likely to lack social support, have lower mental wellbeing and their children are less likely to have reached a good level of development as they start school[13].
Place	Households living in poverty are more likely (33%) to live in housing of poor quality than those who don't suffer from poverty (30%). Particular problems are dwellings with dampness and significant disrepair. Households headed by an ethnic minority are more likely to live in poor housing or in areas with a poor local environment. However, the majority of households, in all ethnic groups, lived in accommodation that was neither overcrowded nor under-occupied. Approximately 15% of household s with one or more disabled persons felt that their current home did not meet their needs[14]. Private tenants (89%) and homeowners (79%) are more likely to feel safe in their neighbourhood than people living in social housing (70%). Overall 35% of Londoners were worried about crime in their neighbourhood. Disabled people are more likely to be victims of vandalism (19%) than people without disabilities (10%).
Population groups	London accounts for 41% of the all non-White British residents in England and Wales. Eighteen of the top 20 local authorities in the national ranking of proportions of residents that are non-White British are London Boroughs, e.g. 80% of Newham's population is non-White. Havering and Bromley are the least diverse borough of London[14]. Christianity is the most common religion (52.9%) in London, follow by Islam (13.5%) and Hinduism (5.5%). There has been a notable change in the distribution of the population based on religious beliefs, for example Islam has seen the largest overall increase in people between 2001 and 2011 with Tower Hamlets having the largest Muslim population (40.8%) in England and Wales[14].

[13] GLA (2011) *Fair London, Health Londoners?*

[14] GLA (2013) *Further Alterations to the London plan – Integrated Impact Assessment Scoping report – The London Plan (Spatial Development Strategy for Greater London).*

Issue	Commentary
Children and young people	Young children from more deprived areas are much less likely to be assessed by teachers as having reached a good level of development as they start school. There is an almost threefold difference between London boroughs in the percentage of young people who are NEET (not in education, employment or training), with figures ranging from 3.4 to 9.3 per cent. Young people in the White and Mixed ethnic groups are more likely to be NEET than most other groups. The percentage of young people with learning difficulties or a disability who are not in education, employment or training, is more than double the London average[13.] Poverty amongst children is highest for those living in social housing (61%) and private rented housing (57%), compared with 20% of those living in owner occupied homes. Children in certain ethnic groups (Pakistani and Bangladeshi households: 64%; Black and Non-Caribbean households: 56%) or with lone parents (mostly mothers) are most likely to live in poverty. Moreover, poverty is higher for children with at least one disabled adult in their household (54%) than for those who are not living with a disabled person (34%). The overall child poverty rate in London is 56%. In 2011/12 London had 1.1 million children in its education system. This figure is anticipated to grow up to 1.25 million children by 2016/17, which is likely to result in a shortage of 118,000 primary and secondary school places. London will experience 42% of all shortages in school places nationally, but will only receive 36% of the recent basic needs capital allocation for 2013 to 2015.
Older people	**Figure C1** shows the expected proportional changes in age structure for the years 2021, 2031 and 2041 in relation to 2011. The figure shows that London will be increasingly faced with a significantly aging population during the timeframe encompassed by the FALP[14]. Twenty-one per cent of London's pensioners live in poverty after housing costs are taken into account. Poverty was higher amongst those living in social housing or private rented accommodation (both 32%) than amongst pensioners living in owner occupied housing (16%). Pensioners in London are at a higher risk to face poverty than pensioners elsewhere in the UK[14].
Employment	The employment rate for white Londoners is higher (74.8%) than for Black, Asian and minority ethnic (BAME) people (60.8%). Within the BAME group employment was highest amongst Indian people (71.2%) and lowest amongst Pakistani/Bangladeshi people (53%). Overall, more men (77%) than women (63.9%) were employed between May and July 2013[14]. There were large differences between the total hourly incomes across London's Boroughs. Whilst adults of Kensington and Chelsea earned an average of £21.57, the adults of Newham only earner £10.13 (2011)[14].

Figure C1 Total Population of Greater London (2001-2041)



Source: GLA 2012 round projections

The objectives-led approach enables an assessment of the extent to which each policy in the FALP contributes to each objective. In order to assess how far each policy contributes to the achievement of this objective a set of guide questions is used. These are:

- 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, in particular address the housing, cultural, social and employment needs of those with protected characteristics?
- Will it reduce the level of crime experienced by those with protected characteristics?
- Will it promote adequate accessibility for older people and the disabled?

Appraisal

The following section provides an appraisal of the FALP and the likely effects on the key IIA sustainability objectives that reflect equalities objectives.

General Policy Amendments

The general policy amendments include:

- Roll the London Plan forward to 2036 (Policies 1.1A and 4.5A).

Response: It is anticipated that there will be no significant effects on equality from rolling the London Plan forward to 2036.

Housing

The policy amendments relating to housing include:

- Update the housing targets and include the latest housing supply figures (3.3, 3.8, 3.10, 3.11).
- Increase the focus on housing provision (and densities) in town centres and opportunities areas (2.7, 2.13, 3.3, 3.7, 3.18).
- Ensure appropriate housing provision is made for custom build homes and within the private rented sector (PRS) (3.8).

Response: The updates to policies include an increase in the housing target, including for affordable housing and inclusion of the new housing supply figures as well as benchmark numbers for the delivery of housing for older people. The alterations also seek to ensure the delivery of affordable housing is maximised and intermediate housing especially, does not remain vacant. Increasing the housing targets within the London Plan and against which the London boroughs will be monitored aims to improve the speed at which quality housing is developed. The alterations also seek to make the best us of this provision. Provision of lifetime homes and wheelchair accessible homes will improve the choice of housing to people from a range of different age groups and/or disabilities. Accessibility will be increased for those who may have mobility issues. Developing housing within town centres may encourage investment in social and physical infrastructure, thus providing easier access to those who less able to travel. Ensuring that appropriate housing provision is made for the private rented sector could potentially provide more housing for older people if there were private landlords specialising in this sector. This will result in an **overall positive effect** on equality.

Opportunity Areas

The London Legacy Development Corporation area (LLDC) is located in the east of London, approximately 4 miles away from the Central Activities Zone (CAZ). East London has some of the highest levels of deprivation in England and the LLDC area includes several wards, e.g. Wick Ward (Hackney)[15].

The policy amendments relating to Opportunity Areas:

- Include reference to the London Legacy Development Corporation and its planning powers (2.4C).

Response: The proposed alterations to the policy will support the ongoing accessible nature of the new facilities and venues of the park as well as including sustainable and high quality building standards. Incorporation of the

[15] http://www.londonlegacy.co.uk/media/09a_Local_Plan_Appendices_1-7_FINAL-public.pdf

principle of convergence through the planning process will ensure that the deprivation gap between LLDC and adjoining boroughs is reduced. The proposed alterations will therefore result in an **overall positive effect** on equality.

Delivery of Development

The policy amendments relating to the delivery of development include:

- Reference detailed polices for Central Activities Zone (CAZ) and the use of Mayor Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF) (2.11, 8.1).

Response: This amendment requires Boroughs to develop more detailed policies and proposals that take account of the priorities of the CAZ. The priorities of the CAZ include '*implementing development frameworks... to benefit local communities*' and to '*improve infrastructure for public transport, walking and cycling, and optimise development and regeneration benefits they can support*'. This is considered to provide an **overall positive effect** for equality.

Transport

The policy amendments relating to transport, include:

- Allow a more 'flexible approach' to be taken with respect to car parking in Outer London (2.8, 6.13).

Response: The policy alterations provide for more flexibility to be undertaken in the implementation of car parking standards to promote office locations in outer London and protect the vitality and viability of town centres. It is anticipated that this approach will support those with mobility problems, shift workers and families with children with access to a car, thereby providing an **overall positive effect** for equality.

Town Centres

The policy amendments relating to town centres, include:

- Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing (2.4, 2.7, 2.15, 4.7, 4.8).

- Reflect the status and function of town centres, including Stratford (2.4, 2.15, 4.7).

Response: The proposed policy alterations will encourage more viable town centres through ensuring an appropriate mix and amount of retail floorspace and promoting increased high-density residential development where good transport linkages are available. Delivering additional housing in town centres may encourage investment in social and physical infrastructure which could reduce inequalities by improving access, for example, to health and community facilities. In some town centres this will be beneficial for residents who are less mobile

and require easier access to key local facilities. These policy alterations will result in an **overall positive result** for equality.

Employment

The policy amendments relating to employment include:

- Include latest figures on office based employment growth (2,13, 4.2, Annex 1).
- Ensure employment/workspace meets the needs of emerging sectors of the economy (2.9, 4.10).

Response: The policy alterations to the London plan will likely ensure that when new infrastructure is provided that a range of social, economic and environmental benefits are all provided. It may provide a variety of jobs, training and skills development resulting in increased opportunities for those who are currently disadvantaged. This will result in an **overall positive effect** for equality.

Social Infrastructure

The policy amendments relating to social infrastructure include:

- Strengthen and clarify the approach to specific types of infrastructure, e.g. local community assets, and open spaces (2.18, 3.18, 4.8, 7.13, 7.18, 7.23, 8.2)

Response: The alterations to the policies above will result in ensuring the provision of localised social infrastructure and include improvements to the planning of open and green spaces. The encouragement to address the demand for burial space will benefit certain religious groups. These policies will support communities which may include poor or deprived persons who may be more likely to rely on social infrastructure thereby providing an **overall positive effect** for equality.

Physical Infrastructure

The policy amendments relating to physical infrastructure include:

- Maximise the benefits from new infrastructure to secure sustainable growth and development (4.1)
- Support the development and delivery of infrastructure, in particular gas and electricity infrastructure (5.4A, 8.1).
- Include reference to the Royal Docks, its unique size and potential for regeneration (7.30).
- Reflect the current delivery programme for cycle infrastructure (6.9).

Response: The policy alterations will result in the delivery of new essential infrastructure and in particular energy infrastructure where capacity is required. This will provide a more resilient and cost effective energy supply for

those who may be subject to fuel poverty. The ability to provide regeneration for the docklands area will provide an opportunity for mixed use developments and provide for improvements in accessibility for the public realm. It is anticipated that these policy alterations will result in an **overall positive effect** on equality.

Design

The policy amendments relating to design include:

- Include reference to policy considerations for design, including lifetime neighbourhoods, designing out crime, local character, public realm, safety and security (7.1, 7.3, 7.5).

Response: The proposed altered policies and in particular the inclusion of the lifetime neighbourhood principles and designing out crime alterations will result in an **overall positive effect** for equality. The principles will result in improvements in accessibility within public spaces and also promote equality for all age groups, as well as those with mobility issues, for new residential developments. It is anticipated that these policy alterations will result in an **overall positive effect** on equality.

Noise

The policy amendments relating to noise, include:

- Update the noise policy, including to address the Explanatory Note to the Noise Policy Statement for England (7.15).

Response: The proposed alterations are likely to increase the inclusion of tranquil and quiet spaces into new developments. These areas provide for people who may have hearing problems or mental illness. It will also benefit those living in overcrowded conditions. Including the identification of these areas during the planning application stage will also ensure that noise reduction has a positive effect on those with disadvantages and who may not be able to leave their homes, or who cannot afford to install noise installation. The policy alteration will result in an **overall positive effect** for equality.

Waste

The policy amendments relating to waste, include:

- Include a CO_2 performance criteria (5.17).
- Update the waste projections (5.17).
- Bring the waste target dates forward by 5 years (5.17).

Response: The proposed alterations are unlikely to result in any significant effects on the equality issues.

Appendix D
Health and Wellbeing Impact Assessment

The consideration of the potential effects on health and wellbeing has been undertaken by AMEC and reviewed by Ben Cave Associates. This IIA meets the needs of the Strategic Environmental Assessment (SEA) Directive[16] and the Mayor's duty to promote the reduction in health inequalities and to have regard to the effects of his strategies on reducing health inequalities in London. This requires that plan makers identify significant effects on a range of factors including population and human health. The Kiev Protocol reaffirms the importance of health and wellbeing and requires that health authorities are consulted as part of the SEA.[17] The issues raised here are also drawn on within the assessment chapters of this IIA Report (Chapter 4).

The World Health Organization (WHO) defines health as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.[18] **Figure D1** develops the WHO definition and shows how health and wellbeing is part of a broad societal context. People's health is not just determined by individual factors, such as physical activity, diet, use of alcohol and tobacco. Nor is it solely determined by people's access to health care services.

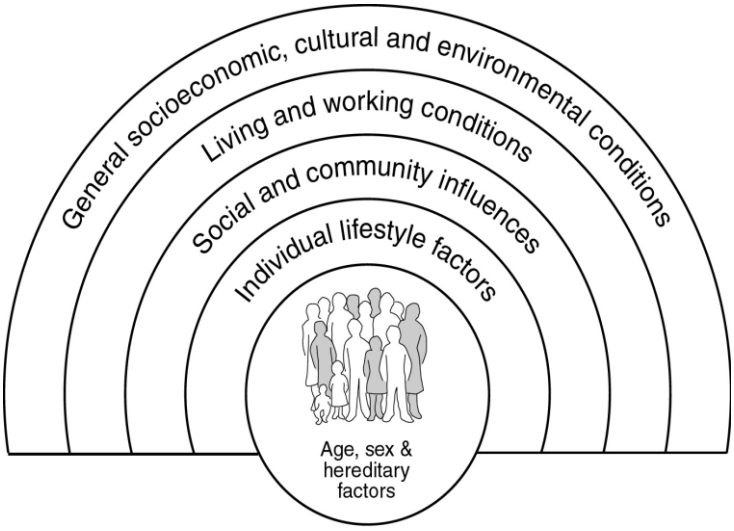
These factors are important but health status at individual level and at population level affects, and is affected by, a broad range of factors such as housing, education, employment, transport, the environment, crime and social cohesion. These are known as determinants of health and across London many of these determinants will be shaped, directly or indirectly, by the London Plan (and its alterations).

[16] European Parliament and Council of the European Union. Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment. *Official Journal of the European Communities* L19730-37, 2001. http://bit.ly/17RIpAO

[17] United Nations Economic Commission for Europe. Protocol on strategic environmental assessment to the convention on environmental impact assessment in a transboundary context. Geneva:12, 2003. http://bit.ly/1bf6wIp

[18] World Health Organization. Preamble to the Constitution of the World Health Organization; signed on 22 July 1946 by the representatives of 61 States and entered into force on 7 April 1948. New York: Official Records of the World Health Organization, no. 2, p.100, 1948. http://bit.ly/1cgnJ3S

Figure D1: The main determinants of health



From: G. Dahlgren and M. Whitehead.
P*olicies and strategies to promote social equity in health.*
Stockholm: Institute for Future Studies. 1991.

Health inequalities are found between different groups and can be measured in different ways e.g. by geography, social class or social position and population. It is important to reduce inequalities in health by improving conditions for people who are of lower socioeconomic status. The importance of reducing inequalities in health is recognised throughout the London Plan. The Mayor also has a duty to reduce inequalities in health through all policies[19] and inequalities in health are one of the themes of the relaunched London Health Commission.[20] Some of the key health challenges for health and wellbeing in London are shown in **Table D1** below.

Table D1: Key challenges for health and wellbeing in London

Issue	Commentary
Health inequalities in London	Londoners do not share equal experiences of health and wellbeing – there are great differences in key health outcomes within the population of the city. The health of Londoners is affected by their income, level of education and working history. Indicators for these determinants of health are worse for people living in the most deprived areas of London. Compared to London as a whole, people living in the most deprived areas have lower life expectancy, can expect to live fewer years without disability, are more likely to lack social support, have lower mental wellbeing and their children are less likely to have reached a good level of development as they start school.

[19] HM Government of Great Britain. Greater London Authority Act. 2007. http://bit.ly/1jghuld

[20] Greater London Authority. London Health Commission: scope and call for evidence. 2013. http://bit.ly/1bgtdsm

Issue	Commentary
Place	Most boroughs have a mixed picture, doing better than average for some of the indicators presented in the report, and worse for others. However six boroughs are significantly better than the England average for every indicator (Bexley, Havering, Kingston, Merton, Richmond, and Sutton). Only two London boroughs are significantly worse than the England average for all of the borough-level indicators reported (Barking and Dagenham, and Islington). There are big differences in outcomes within London boroughs as well as between them. All boroughs have areas of different levels of deprivation, and even the boroughs with the highest overall life expectancy still have areas of low life expectancy within them.
Population groups	While indicators of health and its determinants can generally be reported for geographical areas of London, reporting on population groups within the city is more difficult. For example, information on ethnicity is not collected for some key indicators and for other indicators the quality of the data collected is not high enough to be of use for specific populations. Information on Londoners with disabilities is even more limited. Where ethnicity is recorded, indicators show that people in the Black and Asian ethnic groups are more likely to lack social support and have lower mental wellbeing than the London average. People in the Pakistani and Bangladeshi and Black ethnic groups are also more likely to live in households which do not have a weekly income which is high enough for an acceptable standard of living. However, the percentage of young people in the Indian, Pakistani, Bangladeshi and Black African ethnic groups who are not in education, employment or training, is lower than the London average. This may suggest that positive change can happen over a generation. Households with a disabled adult are much less likely to have a weekly income which is sufficient for an acceptable standard of living than households without a disabled adult.
Health and wellbeing outcomes	London has higher life expectancy than New York, but is lagging behind other world cities, such as Tokyo, Paris and Sydney, particularly for female life expectancy. The difference in life expectancy between those living in the most and least deprived neighbourhood areas of London is 7.2 years for males and 4.6 years for females. Inequality in disability-free life expectancy between the most and least deprived neighbourhood areas of London is even greater (13.6 and 12.1 years for males and females respectively). We currently lack a comprehensive indicator with which to measure the wellbeing of Londoners, but lack of social support and levels of low mental wellbeing, which are useful proxy measures, are highest in the most deprived areas of the city.
Children and young people	Young children from more deprived areas are much less likely to be assessed by teachers as having reached a good level of development as they start school. There is an almost threefold difference between London boroughs in the percentage of young people who are NEET (not in education, employment or training), with figures ranging from 3.4 to 9.3 per cent. Young people in the White and Mixed ethnic groups are more likely to be NEET than most other groups. The percentage of young people with learning difficulties or a disability who are not in education, employment or training, is more than double the London average.

Issue	Commentary
Older people	London faces the challenges of an ageing population with the number of people over the age of 80 living in London estimated to rise by 40 per cent over the next 30 years, reaching 350,000 by 2031 (Source: http://www.ippr.org/research-project/44/7117/older-londoners). *'Growing old in London provides a series of unique challenges. A recent poll commissioned by IPPR found that older people living in London were less likely to have regular social contact than those in other areas of the country. Mental ill-health is also more prevalent in the capital. And the physical infrastructure of the city, from housing and transport to public spaces, provides a particular challenge for those older people who are less mobile. There is therefore a significant challenge for services within London to recognise and adapt to the needs of the oldest residents.'* www.ippr.org
Income status	Having enough money to lead a healthy life is crucial to reducing inequalities. There are great differences in income status across areas of London and some particular groups have a weekly income that is not sufficient for an acceptable standard of living, including five out of six single parents (85 per cent). Single pensioners, people in some ethnic minority groups (particularly the Pakistani and Bangladeshi populations) and disabled people are among other groups of Londoners most likely to live in households with a weekly income insufficient for an acceptable standard of living.

From: *Fair London, healthy Londoners? London, England: Greater London Authority*. 2011.

Appraisal

The following section provides an appraisal of the FALP and the likely effects on the key IIA sustainability objective for Health and Well-being. The Sustainability Objective for the IIA on health and well-being (Objective 3) states '*to maximise the health and well-being of the population and reduce inequalities in health*'. The guide questions are:

- 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?
- Will it promote a sense of well-being?

Each section looks briefly at the policy change before considering evidence that links the main changes to population health. Where possible this is linked to characteristics of population health in London. The nature of the potential health change is then suggested.

General Policy Amendments

The general policy amendments include:

- Roll the London Plan forward to 2036 (Policies 1.1A and 4.5A).

Response: The Mayor's vision is important for health and wellbeing as, among other things, it seeks to improve opportunities for all Londoners and achieve highest environmental standards and quality of life. Rolling the timeframe of the London Plan forward to 2036 will not, in and of itself, have much effect on health and wellbeing. The benefits that will be felt by extending the timeframe will include greater ability to plan strategically for demographic changes and to provide infrastructure accordingly. This must be considered beneficial for health and wellbeing. In this case infrastructure is defined broadly and is not restricted to infrastructure for health and social care. As is shown in **Figure D1** above all forms of infrastructure are likely to have direct and indirect effects on health and wellbeing.

The alterations note the ways in which the population will change over this timeframe. The analysis focusses on total numbers and on the expected demographic profile of the population, including the aging population. It considers the implications this might have for housing demand and whether the change in population is cyclical, and can thus be expected to tail off, or whether it is structural and thus likely to continue at a similar rate. The London Plan looks at the implications of a changing climate for London and ways in which the city must mitigate against climate change and importantly how it must adapt to these changes.

The GLA may also wish to consider the ways in which other aspects of the population are expected to change over the timeframe of the Plan: for example the Foresight team estimate that, by 2050, across the UK 60% of adult men, 50% of adult women and about 25% of all children under 16 could be obese. This has direct implications for a range of chronic diseases, particularly type 2 diabetes, stroke and coronary heart disease and also cancer and arthritis.[21] The NHS costs attributable to overweight and obesity are projected to double to £10 billion per year by 2050. The wider costs to society and business are estimated to reach £49.9 billion per year (at today's prices). This demonstrates the importance of making London an accessible city and one in which active travel is the norm.

A continuing focus on children and young people is crucial in ensuring that the young adults of the 2030s have very different outcomes in terms of health, education and skills, income and employment, and overall quality of life, than their parents.[22]

Housing

The policy amendments relating to housing include:

- Update the housing targets and include the latest housing projection figures (3.3, 3.8, 3.10, 3.11).
- Increase the focus on housing provision (and densities) in town centres and opportunities areas (2.7, 2.13, 3.3, 3.7, 3.18).

[21] Foresight. Tackling obesities: future choices. B. Butland, et el. Government Office for Science. Project report. 2nd Edition, 2007. http://bit.ly/tDpA3V

[22] Supporting healthier lifestyles (2013). London's Growth Boroughs http://bit.ly/1bd63qk

- Ensure appropriate housing provision is made for custom build homes and within the private rented sector (PRS) (3.8).

Response: The connection between health and housing have long been recognised: people living in poor housing are most likely to be socioeconomically deprived and have long-standing illness.[23] Vulnerable groups such as the sick, older people, and the unemployed, are among those most likely to live in poor housing and also tend to spend large amounts of time in their homes exposed to potentially hazardous environments. The evidence shows the links between poor housing and poor health. Poor health is created and maintained by many causes and this can make it difficult to show that people's health improves as a direct result of housing improvements.

GLA population projections based on the Census 2011, anticipate a significantly higher level of growth among those aged over 64 of 23,000 pa (compared to the estimate in the London Plan 2011 of 13,000 pa). It is anticipated that between 2011 and 2036 'over 65s' could increase by 64% and 'over 90s' to grow in number to 89,000. Over the period 2015 – 2025 older Londoners may require 3,600 – 4,200 new specialist units per annum. At the midpoint of this range, these might be broken down broadly into 2,600 private units pa, 1,000 in shared ownership and some 300 new affordable units. There may also be a requirement for 400 - 500 new bedspaces pa in care homes.

The greatest potential for health improvements is for those with existing respiratory illness who are living in houses that are difficult and costly to heat. Douglas *et al*[24] report 'moderate' strength evidence that older people are at particular risk of indoor air quality and extremes of temperature. Improvements in provision of affordable warmth can lead to respiratory health improvement in the short term.[23] Furthermore, housing adaptations to promote independent living and rehousing to meet medical or mobility needs can have health benefits for residents.[23]

A review of population health and the home and the community found that social support (from spouses at home and from social networks in the wider community) or participation in local activities are associated with better health amongst populations of older people.[25] The review also found that fewer social resources at a community level can be associated with increased likelihood of child maltreatment at home, which may increase risks of bi-polar disorder in later life. The review suggests that in planning housing developments consideration should be given to optimising opportunities for social support and social networks, e.g. through appropriate housing mix, layout and integration of services and amenities.

The plan supports Lifetime Neighbourhoods and Homes for older people; references the *draft London Housing Strategy* on investment and notes the role the Mayor has as Chair of the London Health Board, and of the London

[23] M. Braubach, D. E. Jacobs, and D. Ormandy. Environmental burden of disease associated with inadequate housing. A method guide to the quantification of health effects of selected housing risks in the WHO European Region. Copenhagen, Denmark: World Health Organization Europe. 2011. http://bit.ly/16y3Lgc

[24] Douglas, M., Thomson, H., and Gaughan, M. Health Impact Assessment of housing improvements: a guide. 2003 Public Health Institute of Scotland. Glasgow. Available at http://bit.ly/1bf9hcN

[25] Egan M et al. Psychosocial risk factors in home and community settings and their associations with population health and health inequalities: a systematic meta-review. BMC. Public Health 2008;8:239. Available at http://www.ncbi.nlm.nih.gov/pubmed/18631374

Health Commission in recognising and advancing the health benefits of decent housing for older people. The importance for health and wellbeing of providing advice on housing for older people is recognised and the London Assembly recommend that this advice should be conveyed to Health and Well Being Boards. A key focus is on maintaining the distinct economics of specialist provision.

Updating the housing target and ensuring appropriate housing provision, including affordable housing, will provide an improvement in health and wellbeing for those currently within inappropriate or poor housing conditions. The inclusion of the population projections may also improve the ability of decision–makers to plan for strategic improvements in the provision of health facilities. A focus on the housing provision within town centres will also provide easier access to health facilities for some residents. The proposed alterations will result in an **overall positive effect** for health and well-being.

Opportunity Areas

The policy amendments relating to Opportunity Areas:

- Include reference to the London Legacy Development Corporation and its planning powers (2.4C).

Response: The changes to Policy 2.4 will enable the LLDC, and boroughs, to continue to work together to deliver the legacy of the 2012 Games. The bid to host the Olympic and Paralympic Games stated that *the most enduring legacy of the Olympics will be the regeneration of an entire community for the direct benefit of everyone who lives there*. Improving and protecting population health across the Olympic boroughs[26] is, and should remain, a priority. There are short- and long-term challenges to seeing this through:[27] the gap between the Host boroughs and the rest of London remains large on many indicators including indicators for health and wellbeing such as life expectancy. This "convergence gap" is a crisis for the whole of London. The population continues to grow: Census 2011 recorded an additional population of 174,000 in the Host Boroughs. The Host Boroughs traditionally receive new incomers to London who often arrive with multiple needs and then move to other boroughs when they have achieved economic stability. This provides a continual challenge for the Host boroughs. The NHS is currently in transition and this weakens any guarantees that can be given at a time of system change and budget reductions. Post-Games, there is less incentive for Boroughs and partners to work together to tackle complex problems like physical inactivity.

Delivery of Development

The policy amendments relating to the delivery of development, include:

- Reference detailed polices for Central Activities Zone (CAZ) and the use of Mayor Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF) (2.11, 8.1).

[26] Barking & Dagenham, Hackney, Greenwich, Newham, Tower Hamlets, Waltham Forest

[27] Jane Connor. Improving health, and tackling inequalities, in Olympic London. NHS North East London and the City. 2013. http://bit.ly/1dNiuxg

Response: This amendment requires Boroughs to develop more detailed policies and proposals that take account of the priorities of the CAZ. The priorities of the CAZ include *'implementing development frameworks... to benefit local communities'* and to *'improve infrastructure for public transport, walking and cycling, and optimise development and regeneration benefits they can support'* and *'addressing issues of environmental quality raised by the urban heat island effect'*. All of these priorities are considered to provide an **overall positive effect** for health and wellbeing.

Transport

The policy amendments relating to transport, include:

- Allow a more 'flexible approach' to be taken with respect to car parking in Outer London (2.8, 6.13).

Response: It is accepted that transport affects health. Much of the evidence relates to the use and ownership of cars and the ways in which these two factors contribute to beneficial effects such as access to goods and services and to adverse effects such as injury, reduced air quality, noise, reduced social networks etc. Increasing driving by relaxing standards on parking will contribute to these beneficial and adverse effects.

There is generally less focus on the accommodation of cars i.e. parking, as a health issue although this too has effects on health.

Policy 2.8 focusses on the provision of parking in commercial development. There is a potential conflict within Policy 2.8 which aims to support walking and cycling and also aims to relax guidance on parking. This potential conflict is recognised in the para A of Policy 6.13 of the Plan.

On a strategic level cars are subsidized when space for parking is incorporated into the cost of development. This provides a disincentive to use other forms of transport. These alternative forms of transport, such as walking, cycling and public transport can then become less efficient and more expensive. This does not accord with the Mayor's vision. However, the alterations do recognise the Mayor's ambitions to improve cycling infrastructure in general and in particular Outer London. This is reflected in his wider investment programmes.

When considering detailed design it is highly desirable, from a health standpoint, that parking should not be immediately by the building that it serves but a reasonable walking distance away in order to encourage walking and thus physical activity. This does not apply to disabled parking.

Car parking systems for employees should generally be such that they encourage staff to use other modes of transport. In many cases, once someone has signed up to a permit there is no financial incentive not to use the car

as the space has been paid for (most commonly through monthly salary deduction) even though they may on some days be able and willing to use other modes.[28]

In some areas housing with car parking spaces can be sold at a premium or conversely housing without car parking spaces is less popular. The policy supports initiatives such as Car Clubs which break the 3-way, inter-dependent, relationship between use, ownership and accommodation of cars and thus mean that people can have access to a car without having to bring their own car through London to the place of work.

A US review of mobility in older adults found that, in order to promote physical activity (walking) in older adults, developments should give consideration to reducing car commuters; increasing paths and trails; proving retail and employment opportunities close to residential areas; and include traffic safety measures for pedestrians.[29] These principles are reflected in the Lifetime Neighbourhoods concept strengthened in proposed policy 7.1.

It is not clear that the changes to the above policies are wholly supportive of health and wellbeing. Indeed, there may be **adverse effects** on health. It appears that the plan recognises this tension.

Town Centres

The policy amendments relating to town centres, include:

- Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing (2.4, 2.7, 2.15, 4.7, 4.8).
- Reflect the status and function of town centres, including Stratford (2.4, 2.15, 4.7).

Response: It is noted that Policy 3.2C has been adapted to take account of the wide range of instruments that can be used to address health and health inequalities. A policy requiring boroughs to take account of the health impacts of development has, in one form or another, been present in the London Plan since 2001. This latest wording reflects the increasing understanding of the links between health and planning: the GLA now have Best Practice Guidance on planning and health[30] and other GLA guidance documents refer to the importance of addressing health. [31] The plan recognises the opportunities afforded by the fact that Directors of Public Health are now located within local authorities and the emergence of Health and Wellbeing Boards, JSNA process etc. While this provides opportunities it is also a challenge as new organisational relationships are made and links are developed between new departments.

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[28] J. S. Mindell, S. J. Watkins, and J. M. Cohen. Health on the move 2. Policies for health promoting transport. Stockport, UK: Transport and Health Study Group. 2011. http://bit.ly/1bvauNL

[29] Rosso AL, Auchincloss AH, Michael YL. The urban built environment and mobility in older adults: a comprehensive review. J.Aging Res. 2011;2011:816106. Available at http://www.ncbi.nlm.nih.gov/pubmed/21766033

[30] Greater London Authority. Health issues in planning. Best Practice Guidance, 2007. http://bit.ly/IJxCOF

[31] See para 4.2.3*ff* in Greater London Authority. Town Centres. Draft Supplementary Planning Guidance. 2013. http://bit.ly/1bG2Nq0

This change refers to the process by which selected planning decisions are made. The health effects of this change will depend upon the ways in which planning and health choose to address health and wellbeing issues. This in turn depends upon the links that are growing between public health departments and their local authority colleagues.

Activities to protect and support existing populations, and to control the potential adverse effects of gentrification are likely to develop, and protect, improved mental health: for example London Borough of Newham has developed a programme on community, personal and economic resilience for its residents to ensure that existing populations benefit from the changes ahead.[32] This is important across London but particularly important in the Host boroughs which have high levels of deprivation. **Table D1** reminds us that people in Black and Asian ethnic groups are more likely to lack social support and have lower mental wellbeing than the London average.[33]

Policies 2.7, 2.15, 4.7 and 4.8 recognise the changing ways in which the city is used. The focus on mixed-use living and on access by foot to local goods and services and on the attractiveness of neighbourhoods will contribute to increasing physical activity among all age groups. Similar incentives for walking, cycling and play, and for less and slower traffic, in residential neighbourhoods will contribute to increased social networks,[34] increased physical activity and improved mental and emotional health.[28] The policies refer to the draft SPG on Town Centres which includes guidance on promoting public health through the planning process:[31] this is achieved in a range of ways including through increased local ownership and occupation of spaces; provision of infrastructure for active transport and for walking and cycling; and through retail amenities providing access to healthy food. The plan notes the potential for an over-concentration of betting shops and hot-food takeaways. The additional guidance on this issue in the SPG is welcomed. The GLA and London Boroughs are beginning to examine ways in which public health information can assist Boroughs in managing hot food outlets[35] and also betting shops and payday loan shops.[36] The plan supports the inclusion of public health in these issues: this will mean that the arguments by which public health can support planning will continue to be tested and refined.

The policy changes can be expected to contribute to a **positive effect** for health and wellbeing.

Employment

The policy amendments relating to employment, include:

- Include latest figures on office base employment growth (2,13, 4.2, Annex 1).

[32] Resilience LB Newham. 2013. Available on http://bit.ly/1c8YcHX

[33] From: Fair London, healthy Londoners? London, England: Greater London Authority. 2011. http://bit.ly/1aWZEQS

[34] J. Hart. Driven to excess: impacts of motor vehicle traffic on residential quality of life in Bristol, UK. University of the West of England. MSc Transport Planning. http://bit.ly/pjJ73M

[35] Greater London Authority. Takeaways toolkit. Food Matters in association with the CIEH. Tools, interventions and case studies to help local authorities develop a response to the health impacts of fast food takeaways, 2012. http://bit.ly/1bdjaYC

[36] R. Pyper and B. Cave. Health evidence base for emerging policy concerning retail provision. Ben Cave Associates Ltd for NHS Haringey. 2012. http://bit.ly/SZTxTB

- Ensure employment/workspace meets the needs of emerging sectors of the economy (2.9, 4.10).

Response: Policies 4.1, 4.2, 4.10 and 2.9 all provide for office space and other infrastructure for employment. The health effects of these policies might be considered as part of a wider picture. Will the office space conflict with London's need for housing? Will the office space encourage car use or will active modes of travel be encouraged? These are dealt with in other polices. The health effects of employment are important: employment can have positive impacts on physical and mental health.[37] It can provide an income, access to social networks, and a sense of identity and self-worth. The quality of work and the type of employment matters. Low paid, insecure and health-damaging work has negative impacts on health. Jobs need to offer a minimum level of quality, to include not only a decent living wage, but also:

- opportunities for in-work development;
- the flexibility to enable people to balance work and family life; and
- protection from adverse working conditions that can damage health.

Table D1 shows that having enough money to lead a healthy life is crucial to reducing inequalities.[33] There are great differences in income status across areas of London and some particular groups have a weekly income that is not sufficient for an acceptable standard of living, including five out of six single parents (85 per cent). Single pensioners, people in some ethnic minority groups (particularly the Pakistani and Bangladeshi populations) and disabled people are among other groups of Londoners most likely to live in households with a weekly income insufficient for an acceptable standard of living.

The change to the policy includes an approach to ensure that when new infrastructure is provided a range of social, economic and environmental benefits are provided as a result. The altered policies will also increase the range of employment opportunities within London. This approach is likely to ensure an **overall positive effect** for health and well-being.

Social Infrastructure

The policy amendments relating to social infrastructure include:

- Strengthen and clarify the approach to specific types of infrastructure, e.g. local community assets, and open spaces (2.18, 3.18, 4.8, 7.13, 7.18, 7.23, 8.2)

Response: The change in policy will support the provision of social infrastructure, including those that provide health and social services. This may be due in part to the allowance for a restructure of social infrastructure providing increased health and social service provision in areas of identified need. Furthermore, the provision of

[37] Fair society, healthy lives. Strategic review of health inequalities in England post 2010 (Marmot Review), 2010. http://bit.ly/1iK9VjN

social infrastructure will be required to be aligned with national, mayoral and any funding regime policies. This change in policy is likely to result in an **overall positive effect** for health and well-being.

Physical Infrastructure

The policy amendments relating to physical infrastructure include:

- Maximise the benefits from new infrastructure to secure sustainable growth and development (4.1)
- Support the development and delivery of infrastructure, in particular gas and electricity infrastructure (5.4A, 8.1).

Response: The improved approach energy resilience is likely to increase the support of those in energy deprived or inconsistent areas thereby resulting in an overall positive effect for health and well-being. The development of the Royal docks area will likely provide enhancement to open spaces, social and health facilities and employment opportunities. This is likely to result in an **overall positive effect** to the health and well-being of the residents of this area.

Design

The policy amendments relating to design, include:

- Include reference to policy considerations for design, including lifetime neighbourhoods, designing out crime, public realm, safety and security (7.1, 7.3, 7.5).

Response: The policy changes seek to strengthen the focus on high quality high density living and to ensure the quality of design of neighbourhoods and the public realm. The paragraphs below provide findings from reviews of the evidence linking design with health outcomes for different population groups. [38]

A US review states that, for children, the environmental attributes that are consistently associated with physical activity are: [39]

- residential density;
- walkability;
- traffic speed/volume;

[38] Ben Cave Associates Ltd. Villawood East Master Plan HIA Literature Review. New South Wales, Australia: Centre for Health Equity Training Research and Evaluation, part of the Centre for Primary Health Care and Equity, Faculty of Medicine, University of NSW. 2013. http://bit.ly/1cartlo

[39] D. Ding et al. Neighborhood environment and physical activity among youth: a review. *Am.J.Prev.Med.* 41 (4):442-455, 2011.

- access/proximity to recreation facilities; and
- land-use mix.

For adolescents that the most supported correlates were land-use mix and residential density.[39]

These findings suggest that planning policies should:

- enhance access to parks during neighbourhood regeneration;
- encourage schools to open facilities to the community;
- provide incentives for private recreational facilities to locate in under-served neighbourhoods;
- require mixed-use development; and
- create roadways that are pedestrian friendly and promote safe traffic patterns.

These findings are consistent with Carter *et al*[40] who found that socioeconomic disadvantage increases child adiposity (obesity). Reducing socioeconomic disadvantage has an important role to play in reducing levels of childhood obesity. Another opportunity for reducing childhood obesity that may arise during the planning of residential developments is improving opportunities for physical activity.

McCormack et al[41] find 'moderate' strength evidence that access to nearby parks and natural settings is associated with improved healthy weight among children. The review notes that actual and perceived attributes including safety, aesthetics, amenities, maintenance, and proximity are important for encouraging park use. The review reinforces the suggestion that during residential developments opportunities should be taken to create more high quality neighbourhood parks within walking distance.

Yen et al[42] identify 'moderate' strength evidence that neighbourhood environment is important for older adults' health and functioning, as a majority of older adults are inactive and physical inactivity is linked to quality of life, morbidity, and mortality. The review found that more accessible neighbourhood design (including well laid out good quality walking surfaces) supported greater levels of walking.

Similarly, Lovasi et al[43] found 'moderate' strength evidence that quality of sidewalks, parks and exercise facilities affect levels of physical activity. The review notes that as use is also highly dependent on cost, opening hours and

[40] M. A. Carter and L. Dubois. Neighbourhoods and child adiposity: a critical appraisal of the literature. *Health & Place* 16 (3):616-628, 2010.

[41] G. R. McCormack et al. Characteristics of urban parks associated with park use and physical activity: a review of qualitative research. *Health & Place* 16 (4):712-726, 2010.

[42] Yen IH et al. Neighborhood environment in studies of health of older adults: a systematic review. Am.J.Prev.Med. 2009;37(5):455-63.

[43] G. S. Lovasi et al. Built environments and obesity in disadvantaged populations. *Epidemiol.Rev.* 31:7-20, 2009.

maintenance, low income groups usually have less access to indoor and outdoor places to exercise. Lovasi et al also identified that low income and minority populations tend to live in neighbourhoods that are perceived as less attractive and less safe. Their review finds 'low' strength evidence that pleasant aesthetics or green spaces are linked to reduced health disparities and to lower obesity risk. Lovasi et al conclude that advantaged subgroups benefit the most from new resources when they are provided at the same level to all. Thus, a built environment improvement may increase health disparities unless disadvantaged groups are specifically targeted.

The inclusion of Lifetime Principles as a design principles can reasonably be expected to result in higher quality design for new mixed use residential development. It can be expected that this will contribute to a **beneficial effect** on health and wellbeing if this policy change results in improvements to the public realm and in the provision of open space and recreational facilities within close proximity for residents over their lifetime.

Noise

The policy amendments relating to noise, include:

- Update the noise policy, including to address the Explanatory Note to the Noise Policy Statement for England (7.15).

Response: Noise is frequently cited as an environmental stressor.[38] Noise comes from different sources including road traffic, air transport, from neighbours and from specific activities such as construction. This can lead to annoyance and reduced mental health. The GLA has conducted research into the physical health effects of noise.[44]

The change to the policy to include the requirements to consider the Noise Policy Statement for England will ensure that noise effects are more fully considered in strategic decision-making and planning applications. This will result in reductions of noise for new developments and is likely to have an **overall positive effect** on health and well-being.

Waste

The policy amendments relating to waste, include:

- Include a CO_2 performance criteria (5.17).
- Update the waste projections (5.17).
- Bring the waste target dates forward by 5 years (5.17).

[44] B. F. Berry. Effect of noise on physical health risk in London. Report on Phase 2 – estimates of the numbers of people at risk. BEL Technical Report 2008-2, 2008. http://bit.ly/1894tHP

Response: The altered policies are part of a movement towards a low carbon economy. They will thus contribute towards mitigating climate change and can be considered to have a protective effect on health and wellbeing. This finding passes no comment on the level at which the carbon intensity floor has been set.

Appendix E
Community Safety Impact Assessment

The Community Safety Impact Assessment was undertaken by AMEC and is provided below. This addresses the Mayor's duty to have due regard, when preparing his plans and strategies, to the likely effect of these plans and strategies on, and the need to do all that it reasonably can, to prevent crime and disorder in London. The issues raised here are also identified within the assessment chapter of this IIA Report (**Section 4**).

Summary of London's key safety and security statistics

The following are some of London's key statistics relating to community safety[45]:

- The total number of crimes recorded in London fell by 7.8% (from October 2012 to October 2013).
- The total number of burglaries fell by 6.4% (from October 2012 to October 2013).
- Motor vehicle theft rose by 1.6 % from 7,819 in the 12 months to October 2012 to 7,941 in the 12 months to October 2013.
- Homicides have remained unchanged between October 2012 and October 2013.
- Domestic crime increased by 13.4% between the period of October 2012 and October 2013. A relatively significant increase.
- Total robberies within London decreased by 14.5% during the period of October 2012 and October 2013.

The following two key IIA sustainability Objectives are relevant to the assessment:

Objective 8: Flood Risk and Climate Change Adaptation – 'to ensure London adapts to the effects of Climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

Guide questions include:

- Will it protect London from climate change impacts?
- Will it minimise the risks of flooding from rivers and watercourses to people and property?

[45] Metropolitan Police, Crime Figures for London, 2013 http://www.met.police.uk/crimefigures/

- Will it manage existing flood risks appropriately and avoid new flood risks?
- Will it support social and physical infrastructure to be resilient to climate change impacts?

Objective 14: Liveability and Place – 'to create sustainable, mixed use environments that promote long-term cohesion, sustainable lifestyles, safety and security, and a sense of place'.

Guide questions include:

- Will it help reduce actual levels of crime and antisocial behaviour?
- Will it help reduce the perception of crime in an area?
- Will it protect and improve existing quality of life?
- Will it help reduce the risk of terrorist attack?

There are overlaps with health and wellbeing assessment and these issues are covered in **Appendix D**.

Appraisal

The following section provides an appraisal of the FALP and the likely effects on the key IIA sustainability objectives that reflect community safety.

General Policy Amendments

The general policy amendments include:

- Roll the London Plan forward to 2036 (Policies 1.1A and 4.5A).

Response: It is anticipated that no significant effect on Community Safety will result from rolling the London Plan forward to 2036.

Housing

The policy amendments relating to housing include:

- Update the housing targets and include the latest housing projection figures (3.3, 3.8, 3.10, 3.11).
- Increase the focus on housing provision (and densities) in town centres and opportunities areas (2.7, 2.13, 3.3, 3.7, 3.18).
- Ensure appropriate housing provision is made for custom build homes and within the private rented sector (PRS) (3.8).

Response: The update to Policy 3.3 to include an updated housing target and updated housing projection is likely to result in an increase in affordable housing and will ensure that housing is of a high quality and meets specific

local needs to address poverty and inequality. The increase to a requirement of 42,000 houses net per annum will result in an overall positive effect on local Community Safety if the provision of well-planned and designed housing in line with the Mayor's Housing SPG is realised through each borough's LDF. Seeking to bring forward development opportunities and increase the quality of housing within areas that may be deprived or poor together with the redevelopment will reduce the perception of crime within an area and will help reduce actual levels of crime and antisocial behaviour. An **overall positive effect** on community safety will be realised through the proposed policy change.

Opportunity Areas

The policy amendments relating to Opportunity Areas:

- Include reference to the London Legacy Development Corporation and its planning powers (2.4C).

Response: The requirement for the LLDC's DPD to deliver the physical and social infrastructure as well as the delivery of new homes will result in an **overall positive outcome** for community safety within the LLDC local area. The altered policy will encourage integrated mixed use developments with a focus on social infrastructure which will benefit the local community.

Delivery of Development

The policy amendments relating to the delivery of development, include:

- Reference detailed polices for Central Activities Zone (CAZ) and the use of Mayor Development Corporations (MDCs), Enterprise Zones (EZs) and Tax Increment Finance (TIF) (2.11, 8.1).

Response: This amendment requires Boroughs to develop more detailed policies and proposals that take account of the priorities of the CAZ. The CAZ includes many of London's leading financial business services, cultural assets, retails centres and visitor attractions. The types of criminal activities that take place within the CAZ may differ to those outside the area, e.g. levels of shoplifting or pick-pocketing may be higher in the CAZ. However, Policy 7.3 (Designing out crime) requires all Boroughs *"to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion*" regardless of whether they are within the CAZ or not. Therefore, the minor policy alterations are **not anticipated** to have any effect on community safety.

Transport

The policy amendments relating to transport, include:

- Allow a more 'flexible approach' to be taken with respect to car parking in Outer London (2.8, 6.13).

Response: The policy alterations provide for more flexibility to be undertaken in the implementation of car parking standards to promote office locations in outer London and protect the vitality and viability of town centres. The policy also includes the promotion, at the neighbourhood level, of accessible services by other modes of transports. The proposed alterations to the policy are **not anticipated** to have any effect on community safety.

Town Centres

The policy amendments relating to town centres include:

- Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing (2.4, 2.7, 2.15, 4.7, 4.8).
- Reflect the status and function of town centres, including Stratford (2.4, 2.15, 4.7).

Response: The proposed policy alterations will encourage more viable town centres through ensuring appropriate mix and amount of retail floorspace. Providing for more town-centre mixed use residential developments within town centres where an overall surplus of retail floorspace may exist will increase the provision of quality housing and the attractiveness of town centres. This will result in an **overall positive effect** for community safety.

Employment

The policy amendments relating to employment include:

- Include latest figures on office base employment growth (2,13, 4.2, Annex 1).
- Ensure employment/workspace meets the needs of emerging sectors of the economy (2.9, 4.10).

Response: The altered policies will place more emphasis on the provision of local sustainable economic growth and development providing for more varied employment opportunities within areas that may have been previously deprived or poor. This will result in an **overall positive effect** for community safety.

Social Infrastructure

The policy amendments relating to social infrastructure include:

- Strengthen and clarify the approach to specific types of infrastructure, e.g. local community assets, and open spaces (2.18, 3.18, 4.8, 7.13, 7.18, 7.23, 8.2)

Response: Proposed amendments to Policy 7.13 require Boroughs '*to work with various agencies to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure*.' This specific inclusion of community safety within this policy is welcomed and should result in Boroughs working more closely to identify community safety needs. The alterations to the policies above will result in ensuring the

provision of localised social infrastructure, thereby supporting communities and providing an **overall positive effect** for community safety.

Physical Infrastructure

The policy amendments relating to physical infrastructure include:

- Maximise the benefits from new infrastructure to secure sustainable growth and development (4.1)
- Support the development and delivery of infrastructure, in particular gas and electricity infrastructure (5.4A, 8.1).
- Include reference to the Royal Docks, its unique size and potential for regeneration (7.30).
- Reflect the current delivery programme for cycle infrastructure (6.9).

Response: The policy alterations will result in the delivery of new essential infrastructure and in particular energy infrastructure where capacity is required. The ability to provide regeneration for the docklands area will provide an opportunity for mixed use developments which will support the regeneration of the area. The altered policy will result in an **overall positive effect** on community safety.

Design

The policy amendments relating to design include:

- Include reference to policy considerations for design, including lifetime neighbourhoods, designing out crime, public realm, safety and security (7.1, 7.3, 7.5).

Response: The proposed altered policies and in particular the inclusion of the lifetime neighbourhood principles and designing out crime alterations will result in a positive effect for community safety. The policies will emphasise the implementation of community-led projects increasing cohesiveness and thereby improving community safety.

Noise

The policy amendments relating to noise, include:

- Include reference to Explanatory Note to the Noise Policy Statement for England (7.15).

Response: The proposed alterations are unlikely to result in any significant effects on the community safety objective.

Waste

The policy amendments relating to waste include:

- Include a CO_2 performance criteria (5.17).
- Update the waste projections (5.17).
- Bring the waste target dates forward by 5 years (5.17).

Response: The proposed alterations to the policy will result in waste treatment plants meeting the carbon dioxide emissions standard. The proposed alterations are unlikely to result in any significant effects on the community safety objective.

Appendix F
Quality Assurance Checklist

Quality Assurance Checklist	
Objectives and Context	
The plan's purpose and objectives are made clear.	**Section 2**
Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	Sustainability issues relevant to London are identified in **Section 3.3**. International, European, UK and regional objectives and targets have been identified in from the Plans and programmes listed in **Appendix B** and in the Scoping Report.
SEA Objectives are clearly set out and linked to indicators and targets where appropriate.	**Section 3.4** presents the IIA sustainability objectives.
Links to other related plans, programmes and policies are identified and explained.	**Appendix B** identifies a number of relevant plans and programmes.
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	The consultation on the **Scoping Report** ran for 5 weeks (ending on the 26th November 2013). A scoping workshop was held in City Hall in October 2013, to which the statutory and a number of non-statutory bodies were invited.
The SEA focuses on significant issues.	Significant issues were identified in the **Scoping Report** and were reiterated in **Section 3.3** of this IIA Report.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	These are presented in **Section 3.6** of this IIA Report.
Reasons are given for eliminating issues from further consideration.	These are stated in the **Scoping Report** where appropriate and in **Section 3** of the IIA Report.
Alternatives	
Realistic alternatives are considered for key issues and the reasons for choosing them are documented.	Alternatives are identified in **Section 4**.
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	These were considered in **Section 4**.
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	These are included in **Section 4**.
Inconsistencies between the alternatives and other relevant plans,	Refer to **Section 4** and **Appendix B**.

programmes or policies are identified and explained.	
Reasons are given for the selection or elimination of alternatives.	These are presented in **Section 2.3** and **Section 4**.
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	This was set out in the Scoping Report and in **Section 4** of this IIA Report.
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practical.	This is set out in **Section 4**.
Any difficulties, such as deficiencies in information or methods, are explained.	Technical difficulties are set out in **Section 3.6** and are stated through the IIA Report where appropriate.
Prediction and Evaluation of Significant Environmental Effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape) as relevant; other likely environmental effects are also covered as appropriate.	**Sections 4** and **Appendix D and E.**
Both positive and negative effects are considered and the duration of effects (short, medium or long term) is addressed,	**Sections 4** and **Appendix D and E.**
Likely secondary, cumulative and synergistic effects are identified where practicable.	**Sections 4** and **Appendix D and E.**
Inter-relationships between effects are considered where practicable.	**Sections 4** and **Appendix D and E.**
The prediction and evaluation of effects makes use of relevant accepted standards, regulations and thresholds.	These are considered /referenced within this IIA Report where appropriate and are noted in **Section 4**.
Methods used to evaluate the effects are described.	The methodology is set out in **Section 4**, and within the **Scoping Report**.
Mitigation Measures	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These are set out in **Section 5.2**.
Issues to be taken into account in project consents are identified.	These are considered in **Sections 4** where relevant.
Environmental Report	
Is clear and concise in its layout and presentation	The purpose of the IIA Report is set out in **Section 1.2**.
Uses simple, clear language and avoids or explains technical terms.	Abbreviations have been presented in **Appendix A** and technical terms are explained throughout.
Uses maps and other illustrations where appropriate.	Figures and tables have been used where appropriate.

Explains the methodology used.	This is presented in **Section 3**.
Explains who was consulted and what methods of consultation where used.	This is set out in **Section 1.3**.
Identifies sources of information, including expert judgement and matters of opinion.	This is covered in **Section 3**.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered and any changes to the plan resulting from the SEA.	An **NTS** is provided at the front of the IIA Report and as a stand alone document.
Consultation	
The SEA is consulted on as an integral part of the plan-making process.	Consultation has already taken place on the **Scoping Report**. Consultation of the IIA Report will be along side the FALP for 12 weeks.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate timeframes to express their opinions on the draft plan and Environmental Report.	Stakeholders have been engaged during scoping and comments have been sought during designated consultation periods.
Decision-making and Information on the Decision	
The Environmental Report (IIA Report) and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	This will be included in the Post Adoption Statement (to be issued following consultation).
An explanation is given of how they have been taken into account.	This will be included in the Post Adoption Statement (to be issued following consultation).
Reasons are given for choosing the plan or programme as adopted in light of other reasonable alternatives considered.	This will be included in the Post Adoption Statement (to be issued following consultation).
Monitoring Measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	These are presented in **Section 5.2**.
Monitoring is used, where appropriate, during implementation of the plan or programme, to make good deficiencies in baseline information in the SEA.	Details of this are provided in **Section 5.2**.
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect).	Details of this are provided in **Section 5.2**.
Proposals are made for action in response to significant adverse effects.	These are considered in **Section 5.2**. They will also be set out in the Post Adoption Statement (to be issued following consultation).

Appendix G
Iterative Comments and Responses

Below is the record of the iterative process that has helped inform and develop the policies. Suggestions were made by technical experts following consideration of the potential effects to try and make the policies more sustainable.

Chapter	Comment, Query or Recommendation	GLA Response
All	There are proposed revisions to around 28 policies and significant sections of supporting text. These revisions relate primarily to housing, but also cover employment, car parking standards and social infrastructure. The appraisal indicates the proposed changes are predominately beneficial (when assessed against the IIA Objectives). Nevertheless, could the GLA clarify why the changes are being considered as part of a 'minor alteration' rather than as part of a formal review of the London Plan given their breadth.	The population growth identified by the 2011 Census was significant. However, it is considered that the Census may have been taken just after the height of population growth in London and just before the economy begins to recover more strongly. Therefore the GLA consider that there is considerable uncertainty over the long term trend in population and housing projections. Whilst it is acknowledged the population will continue to grow due to natural increase, it is considered that internal migration may return to its historic pattern. This could have significant implications for the DCLG population household projections. At this stage there is the option of 'doing nothing' (i.e. not review the Plan). However, such is the scale of projected population and household increase, the Mayor feels it is important to put in place planning policies to address at least the short to medium term demand for housing and therefore wants to update the Plan to support this. In view of the uncertainties around the long term demographic future of London and indeed the wider South East, the importance of securing sustainable development over this period and the amount of development capacity which has been identified within London, it would be premature to depart from the philosophy of the 2011 Plan. This is to seek to accommodate London's growth within its boundaries without strategic extensions onto its Green belt or Metropolitan Open Land. Once the demographic future is more certain a full review of the Plan may well be necessary, which is why the Alterations commit to carefully monitoring demographic trends and their land use, economic, infrastructure and wider implications in order to ensure that development takes place in the most sustainable way. In addition, making an Alteration to the Plan in these terms will support the boroughs in developing their own plans informed by the new SHLAA and SHMA to address the guidance in the NPPF.
3.85a	The draft alteration states: *'Research shows that in London the planning process is just one among a range of more significant constraints on housing delivery preventing the translation of planning approvals to completions'.* We do not believe this is an entirely correct interpretation of the research and recommend deletion of this paragraph.	This is to address the Government's view that planning is a significant barrier to delivery of housing/development.

1.35	It is correct that water use in London does on very dry periods outstrip supply. Furthermore, as per capita water use is increasing and as population numbers grow the demand for water will increase significantly and it will become more important to manage water usage efficiency. We welcome the recognition of this issue in the amendments to paragraph 5.61.	Yes. Meeting future demand will require a combination of demand management and additional resources to increase supply. This is also recognised in para 5.61 ('… water companies will have to invest in sustainable sources of water'). Thames Water's draft Water Resource Management Plan for example considers a range of supply options including wastewater reuse, regional water transfer and a new reservoir.
1.38, 1.47, etc	There are multiple references to the Mayor's '**2020 Vision'** (1.38. 1.47) before reference is made to the Mayors vision for the London Plan itself (1.52). We appreciate the desire to refer to the '2020 Vision' which sets out the ambitions for infrastructure projects in London, but the driver for the London Plan should be the Vision set out in 1.52. Consider removing some of the earlier references to the 2020 Vision so as not to confuse the reader and not to dilute the strength of the London Plan Vision.	The relationship between Vision 2020 and the Plan's vision has been clarified in finalising the Alteration.
Para 2.12	The reference to this evidence is from 2008. Please could the GLA clarify whether there is more recent information.	The DCLG 2008-based Household projections are the most recent full set available. The GLA produces its own projections, but for areas outside London the GLA relies on the DCLG figures. DCLG issued an interim set in 2013 that incorporated the 2011 census results, but these only extend to 2021 (and are underpinned by the 2011-based subnational population projections which the GLA consider unsound). It is likely the DCLG will produce updated projections next year.
Para 7.29	Consider adding reference in this paragraph to the SPG on *Shaping Neighbourhoods: Character and Context.*	This would not be appropriate here as the SPG does not solely relate to heritage, but to the full range of place shaping principles.
7.30	Consider clarifying that it is 1 **Registered** Battlefield (there are a number of unregistered battlefields).	This is not necessary as it relates to a specific battlefield.
Table 8.1	The Draft London Housing Strategy refers to a target of 15,000 affordable homes, but the draft alteration refers to a figure of 16,000. Is it the intention to revise the London Housing Strategy figure?	Iterative testing of the policy development indicates that 17,000pa should be deliverable on a long term target. It is proposed that this be inserted in the FALP and that consideration be given to refining that draft LHS short term target in light of consultation.
Policy 5.4	The Draft London Housing Strategy refers to a target of retrofitting all affordable homes by 2020 and all poorly insulated homes in London by 2030. Whilst there is a need to avoid duplication of supporting planning guidance the reference to these specific targets would be beneficial.	The Government is altering the funding for the retro-fitting of energy efficiency measures in properties, and particularly for those in fuel poverty. The Mayor partially uses his own funding sources to retro-fit properties across London, but in light of national changes it is considered that this target may need to be reviewed and therefore should not be included in the London Plan.

Appendix G

Appendix H
Cumulative Effects

SEA Objective	1. Regeneration & Land Use	2. Biodiversity	3. Health & Well-being	4. Equalities	5. Housing	6. Employment	7. Stable Economy	8. Flood Risk & Climate Change Adaptation	9. Climate Change Mitigation & Energy	10. Water Quality & Water Resources	11. Waste	12.Accessibility & Mobility	13. Build & Historic Environment	14. Liveability & Place	15. Open Space	16. Air Quality
1. Roll the London Plan forward to 2036.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2. Update the housing targets and include the latest housing supply figures.	+	?	+	+	++	+	+	0	0	0	0	0	0	+/-	+/-	0
3. Increase the focus on housing provision (and density) in town centres and opportunity areas.	+	0	+	+	++	++	+	0	+	0	0	+	0	0	++	+
4. Ensure appropriate provision is made for custom build homes and within the private rented sector (PRS).	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0
5. Include reference to the London Legacy Development Corporation and its planning powers.	+	0	0	++	++	0	0	0	0	0	0	0	0	0	0	0
6. Reference detailed policies for CAZ and the use of MDCs, EZs and TIF.	++	0	+	+	+	+	+	+	+			+	+	+	+	+
7. Allow a more 'flexible approach' to be taken with respect to car parking in Outer London.	+	0	+/-	+	+	+	+	0	-	0	0	+/-	0	+/-	+/-	-
8. Reflect new ways of shopping which are likely to require the review, consolidation of land uses and activities within town centres and to support the delivery of housing.	+	0	+	+	+	+/-	+/-	0	+	0	0	+	0	+/-	+	+

SEA Objective	1. Regeneration & Land Use	2. Biodiversity	3. Health & Well-being	4. Equalities	5. Housing	6. Employment	7. Stable Economy	8. Flood Risk & Climate Change Adaptation	9. Climate Change Mitigation & Energy	10. Water Quality & Water Resources	11. Waste	12.Accessibility & Mobility	13. Build & Historic Environment	14. Liveability & Place	15. Open Space	16. Air Quality
9. Reflect the status and function of town centres, including Stratford.	+	0	+	+	+	+	+	0	0	0	0	+	0	+	+	+
10. Ensure employment/workspace meet the needs of emerging sectors of the economy.	+	0	0	+	0	+	+	0	0	0	0	0	0	0	0	0
11. Strengthen and clarify the approach to specific types of infrastructure e.g. local community assets, and open spaces.	+	0	+	+	0	0	0	0	0	0	0	0	0	+	+	0
12. Maximise the benefits from new infrastructure to secure sustainable growth and development.	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
13. Support the development and delivery of infrastructure, in particular gas and electricity infrastructure.	+	0	+	+	+	0	+	0	+	0	0	0	0	+	0	+
14. Include reference to the Royal Docks, its unique size and potential for regeneration.	+	0	+	+	+	+	0	0	0	0	0	+	0	+	0	0
15. Reflect the current delivery programme for cycle infrastructure.	0	0	+	+	0	0	0	0	+	0	0	+	0	+	0	+

SEA Objective	1. Regeneration & Land Use	2. Biodiversity	3. Health & Well-being	4. Equalities	5. Housing	6. Employment	7. Stable Economy	8. Flood Risk & Climate Change Adaptation	9. Climate Change Mitigation & Energy	10. Water Quality & Water Resources	11. Waste	12.Accessibility & Mobility	13. Build & Historic Environment	14. Liveability & Place	15. Open Space	16. Air Quality
16. Include reference to policy considerations for design, including lifetime neighbourhoods, designing out crime, local character, public realm, safety and security.	+	0	+	+	+	0	0	0	0	0	0	+	+	+	+	0
17. Include reference to Explanatory Note to the Noise Policy Statement for England.	0	0	+	+	+	0	0	0	0	0	0	0	0	+	+	0
18. Include CO_2 performance criterion.	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0	+
19. Update the waste projections.	+	0	0	0	+	+	+	0	+	0	+	0	0	+	+	+
20. Bring the waste target dates forward by 5 years.	0	0	-	0	0	+/-	+/?	0	+	0	+	0	0	-	?	+/-