REPLACEMENT LONDON PLAN

Sustainability Statement

The London Plan

(Spatial Development Strategy for Greater London)

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Contributors credits

Arup were commissioned by the Greater London Authority to undertake independent Integrated Impact Assessments during the development of the London Plan.

REPLACEMENT LONDON PLAN

Sustainability Statement

1. Introduction

The National Planning Policy Framework (NPPF) is clear that the planning system's purpose it to achieve sustainable development through the delivery of three cornerstones of planning; economic, social and environmental opportunities. The SA process ensures that these three cornerstones are continually assessed through the plan making process to ensure that sustainable development is central to the development of plans.

Guidance stipulates that the SA must comply with the requirements of EU Directive 201/42/EC (SEA Directive) which has been transposed into UK law as the Environmental Assessment of Plans and Programmes Regulations 2004 ("SEA Regulations"). The aim of SEA is to provide 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 promoting sustainable development".

Regulation 16 (4) of the SEA Regulations, identifies that a statement must be produced summarising;

• How environmental considerations have been integrated in to the plan or programme;

• How the environmental report has been taken into account;

• How opinions expressed in response to:

• The invitation referred to in regulation 13(2)(d);

• Action taken by the responsible authority in accordance with regulation 13(4)

• How the results of any consultations entered into under regulation 14(4) have been taken into account;

• The reasons for choosing the plan or programme as adopted, in length of the other reasonable alternatives dealt with; and

• The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

This statement outlines and describes the environmental and sustainability considerations and the views of consultees that have been integrated into the replacement Spatial Development Strategy ("the London Plan") prior to its publication Although in strict terms, it becomes "the London Plan" on formal publication by the Mayor, the term "replacement London Plan" is used in this document to differentiate it from the document that it supersedes.

It reflects the outcomes of the Integrated Impact Assessment (IIA November 2017) or full sustainability appraisal that was undertaken and comprises the final step in the process prior to

implementation and monitoring of the policies for the replacement London Plan (paragraphs 1.4 – 1.6 below) and satisfies all points identified in Regulation 16 (4) of the SEA Regulations.

1.1. The IIA was undertaken by independent consultants and was produced in an integrated way to meet the requirements of strategic environmental assessment, health impact assessment, equalities and community safety. The result was an Integrated Impact Assessment Report, which enabled the Mayor both to meet the requirements of the European Directive, and to meet his duties under the Greater London Authority (GLA) Act 1999 ("the GLA Act"), the Equalities Act 2010 and other legislation to take account of a range of matters including:

- Economic development and wealth creation
- Social development
- Improvement of the environment
- Health inequality and promoting Londoners' health
- Equality of opportunity, elimination of discrimination and the promotion of good community relations.

1.2. This report also reflects three IIA Addenda:

1.2.1 An assessment (July 2018) of minor alterations to the policies in the draft London Plan brought forward during the revision and Examination in Public process (paragraph 1.7 below).

1.2.2 An assessment (November 2019) of alterations to respond to the Inspectors' Panel Report that accompanied the Intend to Publish London Plan (paragraphs 1.10 – 1.13 below)

1.2.3 An assessment (December 2020) of the directions by the Secretary of State for Housing, Communities and Local Government under Section 337 of the GLA Act 1999 and the modifications to address those directions in the Publication London Plan (paragraphs 1.14 – 1.17 below)

1.3. In October 2016, the Mayor announced his intention to carry out a full review of the London Plan by publishing *A City for All Londoners*, with a view to publishing a new Plan in early 2020. This was shared with the London Assembly and the Greater London Authority Group and available for public comment. In February 2017 he published his Integrated Impact Assessment Scoping report and made it available for public consultation. Three consultees made a total of 55 comments which were subsequently taken into account. In November 2017, he approved publication of a consultation Draft London Plan for a three-month period of public consultation which took place between 1 November 2017 and 2 March 2018. At the same time, he published an IIA Report, as required by the GLA Act 1999.

1.4. Written responses were received from a total of 4,054 consultation respondents. As a result of the consultation, in August 2018, the Mayor published a Minor Suggested Changes version of the Plan incorporating a total of 1,228 suggested changes that were submitted to the London Plan EiP Secretary on 13 August 2018. An Addendum to the IIA reflecting these proposed changes was published alongside the Minor Suggested Changes in August 2018.

1.5. An Examination in Public (EiP) of the London Plan led by a Panel of Inspectors was held at City Hall between 15 January and 22 May 2019.

1.6. Throughout and shortly after the EiP, and in response to the Panel's matters and discussions with participants that took place in hearings, the Mayor put forward to the Inspectors a number

of further suggested changes. The minor suggested changes, further suggested changes and post-session changes to the London Plan were published in consolidated form in July 2019.

1.7. The report of the Panel conducting the EiP was received on 8 October 2019 and subsequently published on the 18 October 2019. In compliance with the London Spatial Development Strategy (SDS) Regulations[1], the report was also sent to the Secretary of State ("SoS") and made available for public inspection.

1.8. The Panel Report states that the IIA "meets legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment" (London Plan Inspectors' report paragraph 28). However, the Inspectors also recommended that "the Mayor should, in our view, update the IIA as necessary in accordance with relevant legal requirements before the Plan is finalised for publication" (paragraph 602). With respect to the HRA, the Inspectors concluded that "subject to our recommendations, we are satisfied that the Plan meets the requirements of the Conservation of Habitats and Species Regulations 2017 and relevant national policy and guidance." (paragraph 30). The recommended change was made to paragraph 4.1.8B[2].

1.9. The Panel made 55 recommendations to the Mayor. The Mayor gave careful consideration to all of these. The Mayor accepted 30 of the Inspectors' recommendations, accepted 10 in part or with amendment, and did not accept 15 recommendations. In line with Regulation 9(2)(a) this was set out in a formal schedule that was submitted to the Secretary of State for Housing, Communities and Local Government on 9 December 2019, together with a letter explaining his reasons for accepting the recommendations and a version of the London Plan as intended to be published.

1.10. Again, the changes were considered to see if further impact assessment, including equalities assessment was required, and an Addendum to the IIA considering all of the amendments proposed in response to the Inspectors' report was prepared. This was published alongside the 'intend to publish' London Plan on 9 December 2019. The Addendum to the IIA concluded that overall the majority of changes are likely to lead to more positive impacts / improved outcomes, and that in most cases these were relatively minor. Key matters to note are as follows:

- The reduction in small sites targets and housing targets (Policy H1 Increasing housing supply, H2 Small sites and deletion of H2A Small housing developments) shows negative impacts in the EqIA on young, BAME, LGBT+ Londoners and single parent families. However, it is acknowledged that overall this is still an improved position in relation to the current published London Plan (2016) and therefore this was a downgraded positive impact rather than identified as a negative impact.

- Changes to references to Policy E2 and Policy E3 relating to low-cost and affordable workspace would result in the policy being less positive in the medium term under the SEA objective 10 economic competitiveness and employment, and this could impact disproportionately on young people, disabled people, people from BAME backgrounds and women.

[1] The Town and Country Planning (London Spatial Development Strategy) Regulations, 2000
[2] London Plan – Consolidated Suggested Changes version July 2019

1.11. It is also noted that the Addendum considers those changes in the Mayor's 'intend to publish' version and therefore the impact of Inspectors' recommendations that were not accepted have not been set out.

1.12. On the 9 December 2019 the Mayor published his 'intend to publish' version of the London Plan, a response to the Inspectors' report and recommendations and his letter to the SoS as required by the GLA Act. An Integrated Impact Assessment (IIA) Addendum was also published at the same time and sent to the SoS.

1.13. The Act allows a 6 week period for the Secretary of State to decide whether to direct any changes to the draft Plan to avoid inconsistency with national policies or to avoid any detriment to the interests of an area outside Greater London. The SoS has asked for two extensions to this 6 week period. The SoS set out his response on 13 March 2020 directing the Mayor to make 11 separate modifications to his Plan. On 10 December 2020, the SoS directed the Mayor to make two further modifications to his Plan.

1.14. The Mayor made modifications to his Plan and submitted his Publication version to the SoS on XX XXXX XXXX. This was accompanied by an Addendum to the IIA taking into account the modifications set out in the SoS's responses of 13 March 2020 and 10 December 2020 and the modifications in the Publication version where these differed. This was submitted to the SoS alongside the Publication London Plan.

1.15. On XX XXXX XXXX, the SoS responded to the Publication London Plan confirming that the modifications [*insert*]. On publication, the replacement London Plan becomes the Mayor's spatial development strategy for Greater London (commonly known as "the London Plan"), superseding the version published in 2016. It then becomes part of the development plan for Greater London. The replacement London Plan was published in XXXX XXXX.

1.16. The Integrated Impact Assessment Scoping Report was published in February 2017 and the IIA for the Draft London Plan was published in November 2017. Addendums to the IIA were published to assess the impact of changes to the Plan in July 2018, November 2019 and XX 2020. These reports together constitute the final IIA report incorporating the final Equalities Impact Assessment. The Integrated Impact Assessment Report supporting the replacement Plan required by Regulation 7(2) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, can be found at: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan.

2. Preferred Options

2.1. Three strategic spatial development options were developed and considered in the London Plan Review process to help guide policy development. They were developed in response to growth challenges set out in section 2.2 of the IIA Report November 2017 in terms of anticipated growth and six cross-cutting policies for which strategic options were developed as set out in section 2.4 of the document. These cross-cutting policies are set out below together with the options considered for each and the assessment of those options.

2.2. The strategic options for the first cross-cutting policy, **building strong and inclusive communities**, were:

1. Infrastructure-led approach
    - Housing is left to market forces
    - Focus on Healthy Streets, digital connectivity, etc.

- Inclusive accessibility
- Physical infrastructure, green infrastructure and social infrastructure

2. Housing-led approach
   - Target 50% affordable housing
   - Promotion of various types of housing (including co-living, student accommodation)

3. Participation and citizenship-led approach
   - Allowing for and facilitating community-orientated developments
   - Promotion of neighbourhood planning and capacity building
   - Retention and promotion of community assets (cultural heritage, social infrastructure etc.)

2.3. The assessment of these 3 options against the IIA objectives provided the following summary:

Summary	Option 1 is unlikely to meet the needs of all communities across London. It was recommended that a more co-ordinated approach to housing and infrastructure delivery could be considered, including working closely with developers to ensure that affordable and accessible housing is provided where needed.	Option 2 should be widened to consider other housing needs more explicitly, such as specialised housing to support those with long-term health conditions or disability and ensuring inclusive design in all new housing and accommodation developments. This option could also address the delivery of associated infrastructure alongside housing, such as schools, parks and community facilities.	Option 3 should also consider 'secure by design' planning principles, encouraging the role of design in local communities to improve safety, and perceptions of safety.

2.4. A preferred option was developed, which ultimately incorporated aspects of each of the original options, focusing on complimentary measures that achieved maximum potential. The preferred option aims to promote openness, diversity, and equality by providing good-quality services and amenities, increasing social integration to reduce isolation, and supporting equal access to streets and public spaces. It promotes good design of developments to increase safety and foster a sense of community ownership amongst all Londoners, whilst recognising the current barriers to wealth and health inequalities. This option has positive social, design, crime and safety, and accessibility benefits. It supports accessible streets, public places, and public transport to ensure connectivity for all, while promoting healthy and inclusive design to create a sense of pride and ownership within a community. The economic benefits of this option include tackling poverty and deprivation by providing appropriate and affordable housing security which opens up access to employment and education and diversifies the economy.

2.5. The strategic options for the second cross-cutting policy, **making the best use of land**, were:

1. Current London Plan
   - Economic growth centred in CAZ/Isle of Dogs and town centres, Opportunity Areas, Strategic Outer London Development Centres.
   - Housing growth is residential-led in Opportunity Areas and town centres.
   - Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.
   - Industrial land is a managed release approach based on industrial land benchmarks.
   - Density based on SRQ matrix.

2. Sustainable intensification
    - Economic growth is centred on CAZ/Isle of Dogs, Old Oak Common, Stratford, Opportunity Areas, Strategic Outer London Development Centres and dispersed growth across town centres, inner and outer London.
    - Housing growth is residential-led in opportunity areas, town centres, publicly-owned land and small sites throughout the city.
    - Promotes town centres sustaining commercial, cultural, social infrastructure and night-time economy development outside CAZ.
    - Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.
    - A design-led approach is taken to maximise densities, subject to a minimum, particularly in areas that are well connected by high levels of PTAL. Additionally, considers growth corridors based on significant infrastructure delivery.
    - Transport growth focuses on strategic infrastructure, active travel, sustainable mode share and high density development.
    - Industrial land management focuses on retention and intensification of industrial floor space and yard capacity, in addition to selective co-location of residential land and complimentary industrial uses.

3. Polycentric approach
    - Economic growth is dispersed and evenly distributed to town centres, inner and outer London, including local and neighbourhood centres and street markets.
    - Housing growth is based on complementary residential led growth in Opportunity Areas, town centres, publicly owned land and small sites, following the pattern of economic growth.
    - Promotes town centres sustaining commercial, cultural, social infrastructure and night-time economy development outside CAZ.
    - Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment.
    - Density is based on SRQ matrix.
    - Transport growth focuses on orbital transport connections to improve links between lower tier town centres and throughout outer London.
    - No release of industrial land.

4. Current London Plan and selective green belt release
    - Economic growth centred in CAZ/Isle of Dogs, in town centres, Opportunity Areas, Strategic outer London Development Centres and in limited green-belt release to serve the local population.
    - Housing growth is residential-led in Opportunity Areas and town centres. There is additional limited release in sustainable locations identified through the Local Plan process, prioritising previously developed and low performing green belt around commuter hubs.
    - Renewal of medium order town centres, through high density, housing led, mixed-use redevelopment. Additional green belt release with new local/neighbourhood centres to serve the local population.
    - Density is based on SRQ matrix.
    - Transport focuses on strategic infrastructure, active travel, sustainable mode share and high density development.
    - Industrial land is a managed release approach based on industrial land benchmarks

5. Current London Plan and City Region approach

- Economic growth is centred in CAZ/Isle of Dogs, Opportunity Areas, town centres, dispersed growth across inner and outer London and investment in growth location within the Wider South East (WSE) and beyond to achieve mutual benefits.
- Housing growth is residential-led in Opportunity Areas and town centres. Additional investment in growth locations to achieve mutual benefits. Delivery is across the wider region.
- A renewal of medium order town centres, through high-density, housing-led, mixed-use development. Additional coordinated renewal of town centres across the wider region to achieve mutual benefits.
- Density is based on SRQ matrix, supported by exploring opportunities in key growth locations/transport investments around commuter stations and city region centres.
- Transport investment is mutually-beneficial in the WSE and beyond, exploring opportunities to increase efficiency in the transport network across the City Region.
- Industrial land is managed through selective substitution and/or relocation of capacity outside of London to achieve mutual benefits.

2.6. The assessment of these options against the IIA objectives provided the following summary:

Summary Option 2 is the preferred option as set out in para 3.7 below	Option 1 continues following the objectives of the current London Plan, focusing economic growth around the Central Activity Zone (CAZ), Isle of Dogs, town centres, and strategic outer London, with housing growth in key Opportunity Areas. Whilst this would go some way to promote positive long term effects on housing objectives and the social and health benefits associated with high quality new homes in London, the level of growth would be insufficient to meet future demands. This option does support the use of brownfield sites and the delivery of industrial, residential, and mixed-use developments to encourage growth. This would benefit businesses and residents throughout the city, however this benefit would not necessarily be sustainable as demand increases.	Option 3 supports the dispersal of growth across town centres in inner and outer London. It aims to deliver housing in a range of areas alongside economic functions. It promotes town centres outside the CAZ, a revitalisation of town centres, and improving the orbital transport network. The option does not support the release of industrial land. Infrastructure objectives would be met with the delivery of housing, transport, and social and physical infrastructure. It would have a net positive effect on housing, supporting health benefits and alleviating homelessness. Economic benefits would be seen in local economies, increasing employment access particularly for those with mobility issues. The dispersed economic growth could limit London's international competitiveness by reducing the viability of economic centres such as the Isle of Dogs. Dispersed growth could be difficult to sustain equally, and would increase the complexity of public transport travel patterns which may result in less efficient public transport.
	Option 4 continues with the objectives set out in the current London Plan and considers releasing green belt land to serve the local population with new neighbourhood centres. This option supports housing objectives by facilitating the large scale delivery of new homes as part of the current London Plan approach, whilst facilitating the limited release of land in the green belt in sustainable locations, determined through the Local Plan process. However, similar drawbacks to those associated with the current land are likely to be experienced, namely that this increased growth does not go far enough in terms of satisfying the required development in London. Infrastructure and land use objectives are met by this option through the release of low performing green belt land to ensure a range of developments are completed which subsequently unlock economic growth. This benefits businesses and residents, creating jobs throughout the city. This option could have negative environmental effects, since it risks impacting habitats within the green belt and puts natural capital at risk.	Option 5 continues with the objectives set out in the current London Plan and also supports investment in development and growth outside London, into the Wider South East (WSE) region to achieve mutual benefits. Long term positive objectives would result in the delivery of housing in the WSE region, resulting in associated health benefits as new homes are less likely to suffer from cold, damp and other structural issues. The provision of new housing would also alleviate problems related to homelessness and overcrowding. However, the level of development required in London is unlikely to be satisfied by adopting this approach. Green spaces would benefit from this option, ensuring that natural capital is protected and enhanced, increasing access to the natural environment around London and providing the associated health and wellbeing benefits associated with access to green space. The option promotes positive effects on infrastructure and land use objectives, delivering improved infrastructure throughout London and the WSE region. This would have positive economic benefits since it would make businesses more accessible, thereby increasing their competitiveness, however it may drive growth out of London. Increasing transport between London and the WSE region would result in negative air quality and climate change

		impacts, since growth would be encouraged over a wider area thereby increasing the need for transport of increasing amounts of goods, waste, and individuals over a larger area, which would increase emissions and decrease air quality.

2.7. Option 2, Sustainable intensification, was chosen as the preferred option. It seeks to ensure that economic growth is focussed around the CAZ, Isle of Dogs, Old Oak Common and Stratford, alongside town centres and inner and outer London. It aims to ensure that housing is delivered in residential-led Opportunity Areas, town centres, and other sites throughout London. Housing-led mixed use redevelopments would support a design-led approach to maximise densities in town centres, especially areas with high connectivity to public and active transport. This option would maximise available development through the intensification of existing sites as well as the identification of additional development potential.

2.8. This option supports the protection of natural and cultural capital, committing to provide 50% green cover across London and protecting local spaces. Transport growth would be strategic, through investment in active and public transport infrastructure. Industrial land would be managed to make more effective use of existing floor place, and place residential land near to complementary industries. This option would help preserve existing open space supporting social objectives and encourage active transport to deliver health benefits and reduce emissions. Housing delivery objectives would be met with a design-led and needs-based approach to housing development, alongside provision of transport infrastructure, to underpin sustainable growth in brownfield sites, and inclusivity. Economically, this option supports the delivery of business and residential space to keep London competitive, encourage efficient use of land, and ensure growth and economic diversification is facilitated. In promoting public and active transport options, this option reduces emissions and noise, and improves air quality. Green infrastructure would facilitate habitat, species, and landscape protection even in built up areas. This option commits to providing London with 50% green space cover, which could off-set any increased flood risk caused by high density developments.

2.9. The strategic options for the third cross-cutting policy, **creating a healthy city**, were:

1. Prevention - Delivering of an environment that promotes Healthy Streets, good building design, enabling healthy choices, promoting active travel, improving air quality, access to green and open spaces, healthy food environment

2. Cure - Provision of health facilities and care to address health issues

3. Spatially targeted approach - Spatially targeted approach across the wider determinants of health including housing, employment, education etc. to tackle health inequalities

2.10. The assessment of these options against the IIA objectives provided the following summary:

Summary	Option 1 targets the underlying causes of health problems across the population and encourages Healthy Streets, good building design, and green space to promote healthier lifestyle choices. This option has social benefits associated with the provision of green and open spaces, such as the promotion of mental wellbeing, relaxation, community ownership, reduced isolation, and encourages outdoor exercise. These benefits promote greater health and wellbeing,	Option 2 focuses on immediate provision of health and social care facilities to address existing health issues across London. The option has short-term benefits to health and health inequalities by increasing access to healthcare services. Short term economic benefits may be seen due to the reduction in the amount of time spent on sick leave and encouraging people to recover quickly and manage their health conditions. However, this option may not have positive long term effects since the	Option 3 outlines a spatial strategy to improve overall health and reduce health inequalities by managing health and targeting housing, education, and employment inequalities. By spatially targeting health issues, this option facilitates health improvements across the population and supports social objectives. This approach encourages good design of a local area to encourage active travel, exercise, and social integration. Economic prosperity is realised through this option by improving

	which can increase workplace productivity to deliver economic benefits. This option promotes good housing design to deliver high quality and accessible homes which are at lower risk from mould and damp. The investment in Healthy Streets would promote connectivity and increase access to public transport. The provision of green space would benefit the environment, safeguarding habitats and species, and improving air quality.	underlying causes of ill-health are not addressed.	the overall health and wellbeing of residents, which reduces productivity lost to sick days and increased education opportunities. Environmentally, this option supports the provision of green and open space for activities such as exercise, relaxation and mindfulness

2.11. The preferred option is a combination of the above approaches. It simultaneously addresses the underlying issues of ill-health, improving access to health care facilities, and spatially targeting deprived areas and vulnerable individuals. This option would have a positive effect on social objectives by providing access to healthy infrastructure, good quality green space, and active transport which promotes physical activity, community inclusion, and improved physical and mental health. Wider economic prosperity is achieved by reducing productivity lost through sick days, and recognising the effects of education and employment on health and seeking to maximise these opportunities. Design would support regeneration objectives to deprived areas, providing modern high quality homes and green infrastructure to reduce cold and damp, and create a sense of place within the community respectively. Green infrastructure benefits habitats and species, and improves air quality. Accessibility and connectivity through the provision of healthy transport would have positive impacts on climate change, reducing emissions and improving air quality, as well as reducing demand on private vehicle transport.

2.12. The strategic options for the fourth cross-cutting policy, **delivering the homes Londoners' need** were:

1. Focus on temporary housing
    - Promotion of quick build housing, such as prefabricated and 3D printed units for short term need.
    - Promotion of short term housing supply on land that is designated for other purposes in the long term.

2. Delivering against housing need
    - focus on family housing
    - focus on one bedroom or studios.
    - greater focus on addressing need i.e. type and size of dwellings.

3. Leave delivery to the market forces
    - Developer-led housing provision

4. Affordable homes
    - Focus on delivery of affordable homes (concentrating on social/target rents at the expense of total quantum of housing).

2.13. The assessment of these options against the IIA objectives provided the following summary:

Summary	Option 1 prioritises the delivery of temporary housing across London. It supports short term social and economic objectives by alleviating homelessness and providing access to employment and education opportunities. It supports the provision of modern, high quality, and safe homes, but does not address the issue of affordability and fails to provide permanent housing, or meet long term wider housing requirements. This would limit social cohesion and wider access to employment/education and could facilitate crime. This option would also limit infrastructure investment to help improve the area.	Option 2 aims to deliver housing based on need by providing different types and sizes of accommodations, particularly for families, individuals with accessibility issues, and those with other specific needs. This option would have positive social and economic impacts, by increasing the range of housing on the market and providing more choice, particularly those with specific needs. New homes would be more energy efficient and less susceptible to cold and damp issues. The option is likely to encourage investment in physical and social infrastructure. However, delivery of housing under this option does not necessarily consider affordability, and may price some workers out of the city. Infrastructure objectives would be met in the delivery of housing and wider infrastructure with efficient use of brownfield land. Design would be promoted to meet the needs of the local community.
	Option 3 focuses on leaving housing delivery to market-led forces, which could result in some positive economic and social effects. While newer houses are associated with health benefits due to a reduced likelihood of cold and damp, housing would likely be delivered as a 'mass market' product, resulting in smaller house sizes. This option may not address homelessness or overcrowding, and may not take into account the needs of disadvantaged groups in London. Affordability would also not be considered, potentially pricing workers out of the city. Market-led homes may also not be in a suitable location to support employment or education opportunities. If transport considerations are not taken into account, private vehicle use may increase resulting in congestion and poor air quality.	Option 4 focuses on delivering affordable housing, ensuring that workers are not priced out of the city and Londoners have increased housing security, which would assist access to education and employment opportunities throughout London, as well as having direct effects in reducing overcrowding and homelessness. Economic objectives would be met by ensuring workers are not priced out of living in London, which would help to encourage a diverse workforce. This option supports infrastructure, design, and land-use objectives by promoting local regeneration and delivering planned infrastructure to support social, environmental, and physical objectives.

2.14. The preferred option combines aspects of all the assessed options and aims to increase the number of houses on the market, including high quality and affordable new homes. The option would facilitate inclusive developments, supporting the needs of the wider community and those with specific requirements. Social objectives would be met through the development of inclusive communities and wide range of choice available. Affordable homes will ensure a diverse workforce is able to live in London and not be priced out. Health objectives would be met through reduced isolation and by meeting the needs of those with health conditions. The option would support efficient land use, infrastructure, connectivity, and housing objectives by using brownfield sites appropriately, delivering supporting infrastructure, and ensuring communities are connected by strong active and public transport networks. This option delivers economic benefits through provision of access to employment and education by ensuring affordable housing is available to the workforce, and supporting regeneration of deprived areas to create opportunities across London. The use of smaller brownfield sites also supports much smaller construction businesses, helping Small and Medium sized Enterprises (SMEs) to thrive and diversifying the economy further.

2.15. The strategic options for the fifth cross-cutting policy, **growing a good economy**, were:

1. Investment in Infrastructure
    - Supports investment in infrastructure, i.e. workspaces of different types and sizes.
    - Supports economic growth in CAZ, town centres, and industrial areas

2. Dispersed Growth
    - Encourages growth across whole of London.
    - Focuses on local economies.
    - Aims to protect and enhance existing workspaces in London

3. Market Forces

- Leaves growth to market forces.
- Type and nature of employment space unmanaged.

4. Affordable Workspace
   - Emphasises delivery of affordable workspaces.
   - Particular focus on areas where cost is high.

2.16. The assessment of these options against the IIA objectives provided the following summary:

Summary	Option 1 supports investment into workspaces and infrastructure of different types and sizes, and supports economic growth in the Central Activities Zone (CAZ), town centres, and across industrial locations. This would benefit social objectives by providing workspace for SMEs and therefore increasing diversity in the economy. Employment provides positive health benefits by improving financial security. The option would encourage infrastructure investment to provide social infrastructure such as community centres. Access to jobs for people with mobility issues is likely to be increased through this option, for example through improvements to digital infrastructure which support flexible working arrangements. This option would require significant investment which may mean that these effects are more difficult to realise in the short term.	Option 2 aims to disperse growth across local economies in London, and seeks to protect and enhance the existing workspace across London. Social objectives would be supported through the provision of local services, particularly benefitting those who are less mobile. Dispersed growth would not support the provision of appropriate and accessible infrastructure in all areas, meaning that local employment may only support specific groups. Transport infrastructure may not be delivered due to the increased complexity of journey patterns, thereby limiting connectivity or increasing emissions. Local economies may benefit from this option, but it could reduce the competitiveness of London's traditional economic centres like CAZ. This option would not support sustainable land use or transport objectives as growth would not be integrated to maximise efficiency.
	Option 3 would largely leave economic growth to market forces, which may result in social aspects of sustainable development giving way to economic benefits. It is likely that this option would not go far enough to support vulnerable groups or possibly increase access to education and employment opportunities, therefore negatively impacting the health and wellbeing and financial security of individuals. Housing objectives could possibly be negatively affected by this option, since housing demand may not be met, affordable housing may be insufficient, and the balance between provision of land for housing and economic use would not be managed. A market-led approach may only address short term demand and may not address long term need. This option could support economic growth to provide a range of diverse employment opportunities. Without intervention, existing issues may remain or worsen. Lack of affordable workspace would limit the viability of SMEs, and impact creative industries. In addition, economic growth would not be equal, with some groups not accommodated. Environmental objectives are not directly affected but may still affect the economy, such as extreme weather events causing widespread damage and disruption.	Option 4 supports the delivery of affordable workspace in areas where cost pressures are high. This would provide social and economic benefits, supporting SMEs in becoming established and viable in the long term. Wider employment opportunities would arise through this to diversify the economy and help to ensure small businesses are not priced out of London.

2.17. The preferred option aims to conserve and enhance London's economy by encouraging diversification of the economy, and ensuring economic success is shared more equitably. This option promotes growth in education, innovation and research and the development of a 24-hour city. It highlights the need to promote the wider city region and town centres across London, in addition to continuing the success of key economic zones in the Central Activities

Zone and Northern Isle of Dogs. The option has many social benefits, including an increase in opportunity through the promotion of employment and education opportunities, which would result in a reduction in economic inequality. The option also supports health objectives through employment and financial security, and access to education. An increased level of financial security also has the potential to reduce crime and increase safety. Housing objectives may be met by encouraging employment and growth in the right areas to facilitate associated housing growth. This option encourages the integration of different land uses for efficient use of land in the provision of social and transport infrastructure. The option would encourage good design to increase accessibility and connectivity, ensuring modern, reliable infrastructure supports the needs of society, including investment in digital infrastructure and connectivity. This promotes modern business practices through the provision for accessible digital infrastructure and flexible working conditions, which could reduce barriers to employment. Economic competitiveness is improved through access to employment, increased productivity and diversity in the economy, and investment in opportunities, infrastructure and sub-economies. It removes barriers to economic prosperity by ensuring growth is shared throughout London by investment in traditional economic hubs and new workspaces. The management of local neighbourhoods would be required to negate effects of noise created by a 24-hour economy.

2.18. The strategic options for the sixth cross-cutting policy, **increasing efficiency and improving resilience**, were:

1. Climate Change Mitigation
    - Uses principles of carbon reduction to mitigate against climate change

2. Climate Change Adaptation
    - Prioritises adaption to climate change.
    - Aims to tackle flood risk, and reduce overheating, extreme cold, and fuel poverty

3. Safe Designed City
    - Focuses on improving safety and security in London through design.
    - Aims to protect against fire, terrorism, and crime

4. Resource Efficiency
    - Promotes principles of a circular economy.
    - Promotes innovation to improve resource management.
    - Encourages co-ordination between infrastructure providers.

2.19. The assessment of these options against the IIA objectives provided the following summary:

Summary	Option 1 supports carbon reduction measures to mitigate climate change. This supports economic objectives by promoting a zero carbon economy, and supports air quality objectives by reducing emissions and supporting health. However In the short term, this option may not deliver significant benefits, particularly with reference to threats such as flooding, which can be very costly.	Option 2 focuses on adapting to climate change measures by reducing flood risk and the impacts of extreme temperatures, and improving the overall resilience of London. There would be short and medium term benefits to economic objectives, since the risk of damage from imminent threats would be reduced. It does not however address the underlying causes of climate change and therefore would have little or negative economic impact in the long term, since infrastructure would need to be updated and improved which requires significant investment. The option would aim to ensure resilience of the housing stock and therefore enforce the provision of high quality housing, leading to widespread benefits particularly in deprived areas. High quality housing also supports health benefits. The impacts to cultural heritage would need management to ensure they were preserved during the retrofit of resilience measures. This option would support environmental objectives by using green infrastructure to intercept flood water and

		absorb carbon, enhancing resilience against flooding and climate change.
	Option 3 aims to protect residents from threats such as terrorism, crime, and fire, by focusing on security and safety. This would have economic and social benefits by reducing crime and encouraging people to engage in social activities, which would result in health benefits. Considering safety during design would support tourism, the economy, and the night-time economy, and protect vulnerable groups from disproportionate impacts. Design objectives would be met through the promotion of high quality design of infrastructure and housing to design out crime, which increases safety and perceptions of safety. Deprived areas would be improved as existing housing and neighbourhoods are improved.	Option 4 focuses on innovation and a circular economy model to reduce water and promote strong resource management. This option would result in economic benefits, particularly in the long term. Material and waste policies would be positively impacted as waste is minimised and resources become more sustainably managed. Co-ordination between infrastructure providers would possibly increase, resulting in positive infrastructure impacts. Environmental benefits include increased recycling and protection of natural assets, which would improve air quality, however the increased transportation of materials would result in increased emissions.

2.20. The preferred option combines aspects of all the considered options and aims to increase London's efficiency and resilience in terms of environmental and safety threats by improving energy efficiency, targeting a low carbon circular economy, and promoting good design of buildings and infrastructure. Climate change resilience would be improved by managing flood risk and excessive heat. Safety would be improved by ensuring good design of buildings and infrastructure to resist fire and terrorism. The approach to efficiency and resilience should encourage public, private, community and voluntary sectors to work collaboratively. This option prioritises the safety and security of communities and aims to reduce crime to protect vulnerable groups and encourage community cohesion. The economic benefits of this option result from the resilience to climate change in the short and medium term.

2.21. The London Plan was specifically prepared to deliver "Good Growth" to "embrace London's population rise as a once in a lifetime opportunity to write the next big chapter in London's history and to deliver a new vision for our city" as stated by the Mayor in the foreword to the London Plan. This growth responds to the "unprecedented challenges: Brexit and the uncertainty this is causing; air pollution; climate change; and entrenched inequality." Good growth is about "working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it's about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities."

2.22. The IIA shows that the policies in the replacement London Plan have the potential to deliver Good Growth. The IIA process actively influenced the development of the London Plan to ensure the strategic options and policies successfully addresses the key social, environmental and economic issues facing London, and ultimately contribute to sustainability. The IIA team and London Plan team were closely engaged to ensure the delivery of advice and recommendations during the development of the Draft London Plan options and policies were continuous and reactive. The early identification of issues ensured options and policies evolved to maximise benefits and minimise any negative effects. The team also reassessed the Draft London Plan following modifications in response to the consultation and as a result of the Examination in Public.

3. Influence of the Integrated Impact Assessment

3.1. One of the purposes of IIA is to promote sustainable development through the better integration of sustainability considerations into the preparation, adoption and monitoring of plans. The work on the Plan and the associated IIA has ensured that all relevant sustainability considerations have been addressed in the development of policy. Stakeholder engagement has also ensured that this work has been carried out robustly.

3.2. An important aspect for this statement to highlight is the influence the IIA, (that incorporates the Equalities Impact Assessment) and the Addendum Reports, have had on the development of the London Plan. The following table outlines key aspects of the Plan that were highlighted in the IIA reports and where amendments were made as a result of the impact assessment or where changes were proposed for other reasons which impacted on the IIA scoring.

Chapter Policy Area	**Changes resulting from the IIA**
Chapter 1	GG1 was modified (July 2018 Addendum) to achieve a better balance between inclusivity and protection of heritage assets. In this assessment making best use of land was made not applicable. The Intend to Publish London Plan ("ItP Plan") modifications scored positively for making best use of land.
Over-arching spatial option for growth and GG2	Modifications (July 2018 Addendum) improved scoring for conserving heritage assets. The over-arching spatial strategy, Spatial Option 2 Sustainable Intensification in the ItP Plan modifications scored lower (December 2019 Addendum) for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical wellbeing, housing delivery, making best use of land, enhancing connectivity, supporting a resilient and diverse economy and ensuring infrastructure delivery compared to the assessment for the draft Spatial Option 2 Sustainable Intensification subject to consultation (November 2017 IIA). GG2 in the ItP Plan modifications (December 2019 Addendum) scored more positively for reducing emissions and tackling climate change.
Growing a good economy	The ItP Plan modifications (December 2019 Addendum) scored higher for managing and reducing energy demand.
Chapter 2	Some aspects of the Opportunity Areas policy were changed in the final consultation draft, including the removal of specific reference to accessible and healthy spaces. Therefore, a number of the environmental objectives were changed to a neutral/positive scoring (IIA November 2017). However, the policy still promotes regeneration and the removal of environmental, economic and social barriers, which broadly support these objectives. The policy instead makes reference to SD10 Strategic and Local Regeneration, which covers specific detail. This was further modified to strengthen the policy narrative in relation to heritage assets (July 2018 Addendum). The ItP Plan modifications (December 2019 Addendum) scored higher for the health impacts relating to conserving geodiversity. The SoS directed modifications to Policy SD1 (DR4) that scored lower than the ItP Plan for

Chapter Policy Area	**Changes resulting from the IIA**
	supporting a resilient and diverse economy. Although minor changes have been made to the directions to make them workable in practice, these have not improved the scoring in the Publication Plan which remains lower than was scored for the ItP Plan (December 2020 Addendum).
Wider South East	The policy was modified (July 2018 Addendum) to make specific reference to finding solutions to shared strategic concerns such as biodiversity and green infrastructure, improving the scoring for this policy.
Central Activities Zone	Modifications (July 2018 Addendum) improved its scoring in relation to inclusiveness in relation to public realm and traffic dominance. The ItP Plan modifications (December 2019 Addendum) scored higher for short-term health impacts of reducing emissions.
Town centres	Modifications to various policies (July 2018 Addendum) improved scoring for making best use of land, protecting and enhancing town centres, improving outcomes for housing delivery, safeguarding and enhancing the City's rich offer and creating attractive, mixed use neighbourhoods. The ItP Plan modifications (December 2019 Addendum) scored higher for creating attractive and mixed neighbourhoods and further improved scoring for supporting a resilient and diverse economy.
Regeneration	Modifications (July 2018 Addendum) improved scoring for creating a fair and inclusive city. ItP Plan modifications (December 2019 Addendum) further improved scores for creating a fair and inclusive city and also improved scores for improving mental and physical wellbeing, making best use of land, creating attractive and mixed neighbourhoods, supporting a resilient and diverse economy and connecting and enhancing natural capital.
Chapter 3	Modifications in the ItP Plan, resulting in two policies being restructured into four policies, improved scores across most IIA objectives for the first policy relating to London's form, character and capacity for growth, and new IIA assessments for the new policies (December 2019 Addendum). Modifications to the design policy (July 2018 Addendum) resulted in improved scoring for creating attractive and mixed use neighbourhoods and conserving and enhancing the historic environment. Although this policy was restructured at ItP stage, the scoring did not change. The design policy was subject to a direction by the Secretary of State ("SoS") that scored lower than the ItP Plan for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical wellbeing , making best use of land, creating attractive and mixed neighbourhoods, enhancing connectivity and conserving heritage due to the introduction of ambiguity to the policy. However, the Publication version includes modifications to address both the direction and the ambiguity and therefore scores the same as

Chapter Policy Area	Changes resulting from the IIA
	the ItP Plan (December 2020 Addendum).
Inclusive design and accessible housing	Modifications (July 2018 Addendum) improved scoring for making London fair and inclusive, creating attractive and mixed use neighbourhoods, housing delivery and maximising accessibility. Scoring for ItP Plan modifications (December 2019 Addendum) identified further positive impacts for making best use of land, enhancing connectivity and reducing emissions and improved scoring for connecting and enhancing natural capital.
Housing design	The finalised housing quality and standards policy additionally refers to developments ensuring a sense of safety, resulting in positive effects for crime and safety objectives. Additional text was added referencing the provision of recycling storage and therefore waste management objectives have been made positive (IIA November 2017). Modifications (July 2018 Addendum) improved scoring for making London fair and inclusive, contributing to safety and security and maximising accessibility. The ItP Plan modifications (December 2019 Addendum) further improved scoring for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical wellbeing and safety.
Public realm	Modifications (July 2018 Addendum) improved scoring for creating attractive and mixed use neighbourhoods, maximising accessibility and enhancing connectivity. The ItP Plan modifications (December 2019 Addendum) scored lower for creating a fair and inclusive London and ensuring socially integrated communities but higher for ensuring infrastructure delivery and conserving heritage.
Tall buildings	The ItP Plan modifications (December 2019 Addendum) scored higher for conserving heritage but slightly lower for creating attractive and mixed neighbourhoods compared to the November 2017 IIA.
Basement development	The ItP Plan modifications (December 2019 Addendum) scored higher for adapting to climate change, managing flood risk and minimising noise and vibration compared to the November 2017 IIA.
Noise	The ItP Plan modifications (December 2019 Addendum) scored more positively for protecting, connecting and enhancing natural capital and minimising noise and vibration.
Safety including fire safety	Modifications to two ItP Plan policies (December 2019 Addendum) scored higher for safety, creating a fair and inclusive London and housing delivery.
Chapter 4	Modifications to housing policy (July 2018 Addendum) improved scoring for making London fair and inclusive, ensuring socially integrated communities, and outcomes for natural capital. The ItP Plan modifications (December 2019 Addendum) scored slightly higher for ensuring

Chapter Policy Area	Changes resulting from the IIA
	infrastructure delivery. Modifications to making best use of stock (July 2018 Addendum) improved scoring for making London fair and inclusive and making efficient use of land. The SoS directed modifications to Policy H10 (DR1) and the supporting text of Policy H1 (DR11) but this did not affect the IIA scoring (December 2020 Addendum).
Small sites	Modifications (July 2018 Addendum) improved scoring for making London fair and inclusive, making the best use of land, reducing emissions and protecting and enhancing natural capital and heritage assets. Potential outcomes for ensuring socially integrated communities and contributing to safety and security went from unknown to negative in the short-term, but improved in the medium and long-term. However, scoring for managing flood risk went from unknown to unknown/ minor negative. The ItP Plan modifications (December 2019 Addendum) scored lower for housing delivery in relation to long-term equalities impacts. The SoS directed modifications to Policy H2 (DR3) but this did not affect the IIA scoring (December 2020 Addendum).
Affordable housing	Modifications to the threshold approach (July 2018 Addendum) strengthened the narrative surrounding overcoming viability challenges, but this added uncertainty for achieving attractive, mixed use neighbourhoods. Modifications to tenure policy improved scoring for a fair and inclusive city and additional clarity for the use of vacant building credit improved scoring for conservation of heritage assets.
Estate regeneration	Consultation responses highlighted potentially adverse effects that were not sufficiently represented in the IIA. Amendments (July 2018 Addendum) were made to the supporting text but scoring for the policy was lower than the original IIA reflecting the amended assessment of the original policy.
Specialist housing	In response to IIA recommendations on specialist older people's housing (IIA November 2017), the GLA restructured and revised the policy and supporting text, including updating the indicative borough benchmarks. Supporting text was added to the policy specifying that specialist older person's housing developments should be located in areas which allow easy access to services by public transport and active travel modes. Reference was also made to supporting residents in being able to safely and easily move around the wider area, through high quality spaces, whilst enjoying good access to the wider city. However, the policy objectives and effects of implementation remain the same in terms of the IIA as noted in the initial appraisal. Modifications (July 2018 Addendum) further improved scores for making London fair and inclusive, ensuring socially integrated communities and improving mental and physical health. The ItP Plan modifications (December 2019 Addendum) further improved scores for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and

Chapter Policy Area	Changes resulting from the IIA
	physical wellbeing, housing delivery and creating attractive and mixed neighbourhoods.
Gypsies and Travellers	Modifications (July 2018 Addendum) improved scores for making London fair and inclusive, ensuring socially integrated communities and maximising accessibility. The ItP Plan modifications (December 2019 Addendum) further improved scores for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical wellbeing, housing delivery and creating attractive and mixed neighbourhoods. This policy was subject to a direction by the SoS (DR7) that scored lower than the ItP Plan for the health impacts of improving mental and physical wellbeing and housing delivery and the equalities impacts of creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical wellbeing and housing delivery. Although amendments were sought to the direction, these were not accepted by the SoS and therefore the Publication version scores the same as the SoS direction (December 2020 Addendum).
Chapter 5	Additional references to faith groups were made in the supporting text to the social Infrastructure policy (IIA November 2017). A reference to alternative uses meeting the needs of the community was also included. Amendments to the policy provide further clarification of how the policy should be applied but the scoring remained as identified in the initial assessment. Modifications (July 2018 Addendum) improved scores for improving mental and physical health, contributing to safety, maximising accessibility, enhancing connectivity and supporting a strong and resilient economy. The ItP Plan modifications (December 2019 Addendum) further improved scores for creating a fair and inclusive London, improving mental and physical wellbeing and ensuring infrastructure delivery.
Health and social care facilities	Amendments to the health and social care facilities policy as a result of the IIA to provide further clarification of how the policy should be applied (IIA November 2017). The overall effects of implementation of the policy remains the same, however the promotion of physical activity would be an indirect, instead of direct, positive effect as the policy is explicitly focusing on the improvements to health facilities rather than improvements to Londoners' well-being. The ItP Plan modifications (December 2019 Addendum) scored more positively for ensuring socially integrated communities, improving mental and physical wellbeing and ensuring infrastructure delivery.
Education and children facilities	Amendments to the education and children facilities, play and informal recreation and sports and recreation policies as a result of the IIA provide further clarification of how the policy should be applied (IIA November 2017). The overall effects of implementation of the policy would remain as identified in the initial assessment. The ItP Plan modifications (December 2019 Addendum) scored higher for improving mental and physical wellbeing and ensuring education and skills.
Play, sports and recreation	The ItP Plan modifications to two policies (December 2019 Addendum) resulted in improved scores for creating a fair and inclusive London, ensuring socially integrated communities, creating attractive and mixed neighbourhoods, maximising accessibility and ensuring

Chapter Policy Area	Changes resulting from the IIA
	infrastructure delivery compared to the November 2017 IIA.
Public toilets	Amendments were made to the public toilets policy as a result of the IIA (November 2017) including additional text covering issues of ongoing maintenance and surveillance and the removal of the '10 minute walking' distance measure. The supporting text was also amended to clarify the importance of improved security and safety measures. The result is a neutral to positive effect as the details of security measures are to be discerned later in the planning stage. Furthermore, security measures are only considered at the entrance therefore criminal activity could still take place inside toilet facilities, likely after dark. Modifications (July 2018 Addendum) further improved scores for safety and improved scores for creating attractive and mixed use communities.
Burial space	Modifications (July 2018 Addendum) improved scores for conserving heritage.
Chapter 6	Modifications to the skills policy (July 2018 Addendum) improved scores for making London fair and inclusive and supporting a strong and resilient economy.
Suitable/ affordable workspace	The ItP Plan modifications to two policies (December 2019 Addendum) reduced scoring for supporting a resilient and diverse economy and safeguarding London's cultural offer compared to the November 2017 IIA.
Industrial	Modifications to restrict uses in Strategic Industrial Locations (July 2018 Addendum) reduced the score for making London fair and inclusive from unknown to unknown/minor negative. Further modifications to this policy in the ItP Plan (December 2019 Addendum) identified additional impacts on improving mental and physical wellbeing, maximising accessibility and enhancing connectivity which were negative and uncertain. The SoS directed modifications to Policies E4, E5 and E7 (DR4 as amended by) that scored lower than the ItP Plan for creating a fair and inclusive London, making best use of land, enhancing connectivity and supporting a resilient and diverse economy. Although minor changes have been made to the directions to make them workable in practice, these have not improved the scoring in the Publication Plan which remains lower than was scored for the ItP Plan (December 2020 Addendum).
Visitor infrastructure	Significant changes were made to accessible hotels policy requirements in Part G with additional option provided (IIA November 2017). The GLA also included references to legibility to enhance connectivity and further information / references to supporting infrastructure including public realm, public toilets and measures to promote access by walking, cycling and public transport. However, in terms of impacts on the transport network, these would be addressed by policy T4. References were also added to spreading economic and regeneration benefits by promoting tourism. The GLA clarified that Part D of the policy, in combination with the housing supply policies would ensure that visitor accommodation would not compromise convention housing. The implementation of the finalised Policy would not include a reference to secure or safe environment. However, the policy would contribute in protecting and

Chapter Policy Area	Changes resulting from the IIA
	enhancing the historic environment. Modifications (July 2018 Addendum) further improved scores for safety and improved scores for making London fair and inclusive and supporting a strong and resilient economy.
Chapter 7	Changes to the original Heritage and Culture policy have not provided major changes to the original assessment (IIA November 2017). The implementation of this policy would enhance London's cityscape in the as conservation is supported while not discouraging new developments. The redevelopment of heritage assets with modern design and techniques would allow the promotion of low-carbon, sustainable options. The effect on energy use may be only neutral as heritage asset protection will limit the scope of carbon emission improvements. ItP Plan modifications (December 2019 Addendum) identified further positive impacts for making the best use of land.
World Heritage Sites	The World Heritage Sites (WHS) policy was amended to clarify further the role of WHS Management Plans in respect of plan making and development proposals (IIA November 2017). However, the GLA clarified that whilst the GLA was a member of World Heritage Site Steering Groups (who were responsibly for preparing and implementing WHS management plans) they are not the lead of these groups and therefore not able to set policy in relation to the management of World Heritage Sites. The amendments made to the policy provide further clarity in relation to how the policy will be applied however the overall effect of implementation will remain the same as noted in the initial appraisal. Modifications (July 2018 Addendum) further improved a score for the long-term equalities impact of conserving heritage compared to the November 2017 IIA.
Strategic and local views	Amendments were made to the strategic and local views policy and supporting text in response to the IIA (November 2017) to address community access and highlight inclusivity, providing education information boards and ensuring the locations were well managed to facilitate supporting infrastructure. The amendments provide further clarification on how the policy should be applied, however the effects of implementation will remain as identified in the initial assessment. ItP Plan modifications (December 2019 Addendum) scored slightly higher for the long-term sustainability impacts for conserving heritage compared to the November 2017 IIA.
London's view management framework	The London's view management framework policy and supporting text were altered to address inclusive access and provision of information for visitors (IIA November 2017). The amendments provided further clarity in relation to how the policy will be applied, however the overall effect of implementation will remain the same as noted in the initial appraisal.
Supporting London's creative and cultural industry	Substantial changes were made to the policy and supporting text in order to streamline content and improve readability (IIA November 2017). The amended policy would encourage partnership and collaboration between creative industries and educational institutes helping to train young talent, encourage volunteer work associated with cultural opportunities and provide employment opportunities in creative industries. This would positively impact young people ensuring they receive the formal and vocational education required to attain employment in the future.

Chapter Policy Area	Changes resulting from the IIA
	Modifications (July 2018 Addendum) further improved scores for making London fair and inclusive and socially integrated.
Supporting the night-time economy	The policy was amended to further highlight some of the potential negative impacts in relation to the night-economy (IIA November 2017), however the GLA advised that the policy supports proactive planning such as diversifying the night time offer to ameliorate the agglomeration of uses such as public houses and night clubs. Part C of the policy requires boroughs to take an integrated approach to planning and licensing, safety and security etc. by working closely with stakeholders such as the police. This would help with more indirect impacts such as the management of traffic flow and potentially congested public footpaths. Amendments to the policy provide further clarification of how the policy should be applied and highlights some of the recommendations, however the overall effects of implementation of the policy would remain as identified in the initial assessment. Modifications (July 2018 Addendum) further improved scores for making London fair and inclusive and socially integrated, safety and protecting natural capital. Under the health impacts, some uncertainty was added to the minor negative score for the long-term potential impact on mental and physical health.
Protecting public houses	References to the unique and varied role of pubs, their contribution to the regeneration of town centres or local areas were included as were references to saturation levels and the agent of change principle in the consideration of new pubs. A stronger link was made to policy HC6 night-time economy in mitigating potential anti-social behaviour. Amendments to the policy provide further clarification of how the policy should be applied and highlights some of the recommendations, however the overall effects of implementation of the policy would remain as identified in the initial assessment (IIA November 2017).
Chapter 8	Modifications to the overarching policy (July 2018 Addendum) improved scoring for efficient use of land and improving connectivity. The ItP Plan modifications for the open space policy (December 2019 Addendum) scored slightly higher for the long-term impacts on protecting, connecting and enhancing natural capital.
Green Belt	The SoS directed modifications to this policy (DR5) but this did not affect the IIA scoring (December 2020 Addendum).
Metropolitan Open Land	Scoring following modifications (July 2018 Addendum) recognised potential impacts relating to the efficient use of land, scoring positive rather than N/A. Improved scoring was given to safeguarding the cultural offer while strengthening London's global position and protecting, connecting and enhancing natural capital. ItP Plan modifications (December 2019 Addendum) scored higher for the sustainability impacts of creating attractive and mixed neighbourhoods and health impacts of adapting to climate change.

Chapter Policy Area	Changes resulting from the IIA
	The SoS directed modifications to this policy (DR6) that scored slightly lower for the long-term sustainability scoring for protecting, connecting and enhancing natural capital (December 2020 Addendum). The Publication Plan includes the direction text and therefore the slightly lower scoring.
Urban greening	The supporting text for the urban greening policy was amended to clarify the application of the Urban Green Factor. Further clarification was provided that the table set interim standards for both commercial and residential developments in advance of boroughs adopting their own local benchmarks. The amendments provide further clarification on how the policy should be applied, however the effects of implementation of the policy would remain as identified in the initial assessment (IIA November 2017). The ItP Plan modifications (December 2019 Addendum) scored slightly higher for the long-term sustainability impacts on creating attractive and mixed neighbourhoods compared to the November 2017 IIA.
Biodiversity	Modifications responding to consultation and compliance with the NPPF (July 2018 Addendum) increased uncertainty for reducing emissions and adapting to climate change and improved scoring for protection, connection and enhancement of natural capital.
Food growing	Modifications (July 2018 Addendum) improved scoring for maximising accessibility and protection, connection and enhancement of natural capital. The ItP Plan modifications (December 2019 Addendum) had greater uncertainty about conserving geodiversity.
Chapter 9	Additional supporting text to the sustainable Infrastructure policy was included which clarifies the requirements of the air quality focus areas and buffer zones (IIA November 2017). The policy text was amended to clarify that the policy applies only to new developments and that the retrofitting and management of existing assets will be addressed through the London Environment Strategy and the Mayor's Transport Strategy. In addition to this, the policy will address how the different air quality management areas (e.g. air quality focus areas, buffer zones, ultra-low emission zones) have been defined and categorised. The policy will only make reference to mitigation strategies for new developments as these are the ones that it has primary control over.
Air quality	Modifications (July 2018 Addendum) improved scoring for the long-term health impacts of reducing emissions. ItP Plan modifications (December 2019 Addendum) identified further positive/uncertain impacts relating to creating attractive and mixed neighbourhoods and improved scoring for reducing emissions.
Minimising greenhouse gas emissions	Modifications (July 2018 Addendum) improved scoring for the long-term sustainability impacts of reducing emissions. The ItP Plan modifications (December 2019 Addendum) identified further positive impacts for tackling and reducing waste.
Energy	Additional text was added which references the CIBSE code of practice, which details how heat

Chapter Policy Area	Changes resulting from the IIA
infrastructure	networks should be specified to be efficient and cost-effective for occupiers (IIA November 2017). This policy was also amended to include reference to the London Environment Strategy which contains further details on initiatives which support the implementation of low carbon energy generation. In addition to this, the policy would address how district heat networks should be designed to be efficient and cost-effective ensuring good value for its customers. The policy would make reference to the recommendations made in the London Environment Strategy on the implementation of low carbon energy generation. This does not change the overall assessment outcomes, but adds further clarity. Further modifications (July 2018 Addendum) improved scoring for mental and physical health and changed scoring for medium-term equalities impacts for reducing emissions (from neutral to minor positive/unknown). ItP Plan modifications (December 2019 Addendum) altered scorings for creating attractive and mixed neighbourhoods with mixed impacts and uncertainty.
Managing heat risk	Modifications (July 2018 Addendum) improved scoring for reducing emissions and amended the scoring to recognise that this impacts on noise and vibration, with broadly unknown and unknown/minor positive scores.
Water resources	Modifications (July 2018 Addendum) to various policies (SI5, SI12, SI14, SI16 and SI17) improved scoring in different policies for creating a fair and inclusive London, ensuring socially integrated communities, improving mental and physical health, housing delivery, maximising accessibility, ensuring resilience to climate change, protection and enhancing natural capital and waterbodies and conservation of heritage. The ItP Plan modifications to the strategic role, use and transport policies (December 2019 Addendum) improved scoring for improving mental and physical wellbeing, adapting to climate change and managing flood risk and identified further positive impacts for making best use of land and ensuring infrastructure delivery.
Digital connectivity	Modifications (July 2018 Addendum) improved scoring for creating a fair and inclusive London and supporting a strong and resilient economy.
Reducing waste	Modifications to the two policies (July 2018 Addendum) improved scoring for minimising noise and vibration. ItP Plan modifications to these policies and an additional policy on waste sites (December 2019 Addendum) scored higher for creating attractive and mixed neighbourhoods, reducing emissions, tackling climate change and medium term impacts on tackling and reducing waste and further positive impacts were identified for ensuring infrastructure delivery.
Aggregates	Modifications (July 2018 Addendum) improved scoring for creating a fair and inclusive London, mental and physical health, conserving heritage and minimising noise and vibration. The ItP Plan modifications (December 2019 Addendum) scored higher for tackling climate

Chapter Policy Area	Changes resulting from the IIA
	change and conserving heritage.
Chapter 10	The ItP Plan modifications to the strategic approach policy (December 2019 Addendum) scored higher for enhancing connectivity. Some detail of the inital transport capacity, connectivity and safeguarding policy was removed along with minor editorial amendments, however the direction of the policy remained the same (IIA November 2017). The detail removed relates to specific transport attributes to be targeted, as well as reference to intensification and the environmental performance of the public transport system. Removal of the specific mention of environmental performance of the transport system has changed some of the previously positive effects to no change. However, the addition of the safeguarding the Walk London Network and the emphasis on the bus network has benefits for both health and the environment. Modifications (July 2018 Addendum) further improved scoring for creating a fair and inclusive London, ensuring socially integrated communities and housing delivery. ItP Plan modifications (December 2019 Addendum) improved scoring for creating attractive and mixed neighbourhoods.
Transport impacts	The clarifications in the finalised policy in response to the IIA (November 2017)ascertain the positive effects this policy would have on issues such as air quality.
Cycle parking	Modifications (July 2018 Addendum) improved scoring for maximising accessibility and enhancing connectivity.
Car parking	Modifications to various car parking policies (July 2018 Addendum) improved scoring for creating a fair and inclusive London, ensuring socially integrated communities, making efficient use of land, maximising accessibility, improving connectivity, reducing emissions and managing flood risk. The ItP Plan modifications to residential car parking (December 2019 Addendum) identified further positive impacts for supporting a resilient and diverse economy. Residential parking was subject to a direction by the SoS (DR9) that scored lower than theItP Plan improving mental and physical wellbeing, creating attractive and mixed neighbourhoods, enhancing connectivity and reducing emissions. The Mayor includes amended wording in the Publication version that addresses the direction and also improves the scoring, although it is still lower than the ItP version. The retail parking policy was also subject to a direction (DR10) by the Secretary of State (“SoS”) that had more uncertain scoring than the ItP Plan for making best use of land, improving mental and physical wellbeing, safety, creating attractive and mixed neighbourhoods and enhancing connectivity and reducing emissions. Amendments were made to the direction but these do not improve the scoring compared to the direction, and it remains poorer compared to the ItP Plan.
Deliveries, servicing and construction	Modifications under a previous title ‘Freight and servicing’ (July 2018 Addendum) helped identify impacts previously thought to be not applicable, scoring broadly minor positive/unknown: creating a fair and inclusive London, improving safety, maximising accessibility and the equalities impacts of reducing emissions. These modifications also

Chapter Policy Area	Changes resulting from the IIA
	improved scoring for maximising accessibility, reducing emissions and minimising noise and vibration. The ItP Plan modifications (December 2019 Addendum) identified further positive impacts for creating attractive and mixed neighbourhoods and enhancing connectivity.
Aviation	Modifications (July 2018 Addendum) improved scoring for improving mental and physical health.
Chapter 11	The delivery of the plan and planning obligations policy and the supporting text was amended to provide greater clarity in response to the IIA (November 2017). Modifications (July 2018 Addendum) identified the potential to impact on making London fair and inclusive and ensuring socially integrated communities, scoring them uncertain for equality rather than not applicable. It also identified the potential to impact on managing flood risk and protecting, connecting and enhancing natural capital scoring minor positive rather than not applicable.

3.0 Equalities Impact Assessment

3.1 The Mayor and GLA are subject to the public sector equality duty, as set out in Section 149 of the Equality Act 2010 (as amended). The 2010 Act includes a single public sector equality duty ("Equality Duty") bringing together race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment. These are the grounds upon which discrimination is unlawful and are referred to as 'protected characteristics.'

3.2 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 remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. The steps involved in meeting the needs of disabled persons include, in particular, steps to take account of disabled persons' disabilities. Having due regard to the need to foster good relations 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 tackle prejudice, and promote understanding. Compliance with these duties may involve treating some persons more favourably than others.

3.3 An Equalities Impact Assessment was carried out as part of the wider IIA (paragraph 1.2) of the Draft London Plan published in December 2017. The outputs of the Equalities Impact Assessment of the Plan were integrated into the outputs of the full IIA report. A set of key guide questions were also used in the assessment of how each policy would contribute (or not) to the achievement of this objective. Key guide questions relating to equalities were included in 20 of the 24 IIA objectives. The Equality Impact Assessments were updated as part of the IIA

Addendum reports in July 2018, November 2019 and December 2020. In addition, as part of the Examination in Public, as a result of a request of the inspectors, a Summary of specific implications of the Plan on the 9 groups with Protected Characteristics was published.

3.4 Although low-income groups are not identified within the 'Protected Characteristics' under the Equality Act they were also included as part of the assessment because low-income and deprivation typically overlap with other equalities characteristics and form relevant considerations in the context of achieving inclusive growth. Similarly, working patterns were included within the identified equalities groups, to ensure that adequate consideration is made for residents undertaking shift work, including night shifts. This type of working can disproportionately be undertaken by low-income communities, and forms part of the wider equalities assessment.

3.5 In line with the statutory requirements of the Equality Act (2010), the IIA gave due regard to the need to remove or minimise disadvantages, discourage discriminatory practices and proactively accommodate the needs of equalities groups. This was carried out by identification of sensitive receptors, who may be disproportionately impacted as a result of policy implementation, along with recommending how policies could be strengthened to promote equitable opportunities. The key guide questions serve to assess the multiple dimensions of inequality, disadvantage and discrimination, and ensure policies are promoting inclusive, accessible and equitable opportunities across higher risk groups.

4.0 Monitoring

4.1 Section 17 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires the monitoring of significant environmental effects of the plan's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. It also states that monitoring arrangements may comprise or include arrangements established for other purposes.

4.2 Paragraph 025 of the Planning Policy Practice Notes (PPG) on Strategic Environmental Assessment and Sustainability Appraisal[3] also states that details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the plan itself.

4.3 Existing monitoring measures include the London Development Database – recently replaced by the new Planning London Data Hub, which monitors planning applications, permissions and completions across London for development trends. The database also supports the production of the London Plan Annual Monitoring Report (AMR). A set of 12 key performance indicators (KPIs) are listed in Chapter 12 of the Publication London Plan December 2020 (Table 12.1) and these will be monitored by the AMR each year. The AMR also monitors a range of other data, that is relevant to understanding the implementation of the Plan in the wider context, and to inform future reviews of the Plan. Following the publication of the final London Plan, the contextual indicators for inclusion in future AMRs will be consulted upon as described in paragraph 12.1.2 of the Publication London Plan December 2020.

4.4 Whilst the AMR is a key element in the Plan – Monitor- Manage cycle, monitoring is also undertaken by the other Mayoral Strategies as well as the London Sustainable Development Commission. Table 1 below sets out relevant indicators which are grouped alongside the IIA objectives to illustrate their breadth of coverage.

[3] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
1. Equality and inclusion	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	Gap in earnings between the top 10% and bottom 10% of households Percentage in poverty/ persistent poverty Early years education Education attainment	Economic Development Strategy London Equality, Diversity and Inclusion Strategy London Equality, Diversity and Inclusion Strategy
2. Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	Proportion of people who agree that this local area is a place where people from different backgrounds get on Proportion of adults who agree or strongly agree that they feel they belong to their neighbourhood.	Social Integration Strategy Social Integration Strategy
3. Health and Health Inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	Modal Share Londoners engaging in active travel – cycle parking Adults 20 mins active travel/day Healthy Life Expectancy	AMR - KPI 8 AMR - KPI 9 Health and Health Inequalities Strategy
4. Crime, safety and security	To contribute to safety and security and the perceptions of safety	Number of recorded crimes	Economic Development Strategy
5. Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and	Supply of homes Supply of affordable homes New build homes meeting accessibility standards	KPI 1 KPI 2 Equality, Diversity and Inclusion Strategy/ ACAS

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
	household demand		
6. Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	Modal Share Londoners engaging in active travel – cycle parking Air Quality	KPI 8 KPI 9 KPI 10
7. Design	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness, reducing the need to travel by motorized transport	Modal Share Londoners engaging in active travel – cycle parking Proportion of adults who agree or strongly agree that they feel they belong to their neighbourhood.	KPI 8 KPI 9 Social Integration Strategy
8. Accessibility	To maximise accessibility for all in and around London		
9. Connectivity	To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes	Modal Share	KPI 8
10. Economic competitiveness and employment	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all	Supply of offices Provision of affordable workspace Availability of industrial land Employment rate gaps	KPI 3 KPI 4 KPI 5 Social Integration Strategy
11.	To ensure that provision of environmental, social and physical	Protection of Green Belt and MOL	KPI 6

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
Infrastructure	infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	Modal Share Number of London's digital 'not spots' Average classroom size in primary school	KPI 8 Economic Development Strategy AMR Department for Education
12. Education and skills	To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all	Increase in the supply of high quality early education and childcare Average classroom size in primary school	Economic Development Strategy AMR
13. Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	Provision of cultural infrastructure Number and condition of designated heritage assets	KPI 12 AMR
14. Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	Modal Share Londoners engaging in active travel – cycle parking Air Quality – referable applications demonstrating air quality neutral Number of legal exceedances per year Area covered by Air Quality Focus Areas	KPI 8 KPI 9 KPI 10 Environment Strategy Environment Strategy LSDS

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
15. Climate change adaptation and mitigation - extreme weather events such as flood, drought and heat risks	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	Protection of Green Belt and MOL	KPI 6
16. Climate change adaptation and mitigation - reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	KPI 7 – Carbon Emissions through new development KPI 8 - Modal Share CO2 Emissions - Scope 1&2 greenhouse gas emissions for homes, workplaces and transport	KPI 7 KPI 8 Environment Strategy/ LSDS
17. Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	Carbon Emissions through new development Improving Energy Efficiency of Housing	KPI 7 Housing Strategy
18. Water resources and quality	To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage	Restoration of rivers and streams	AMR

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
	system		
19. Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	Number of properties affected by surface water flooding	Environment Strategy
20. Natural Capital and Natural Environment	To protect, connect and enhance London's natural capital including important habitats, species and landscapes) and the services and benefits it provides	Protection of Green Belt and MOL Green Cover Tree Cover Urban Greening Factor Access to Nature	KPI 6 Environment Strategy Environment Strategy ACAS LSDS
21. Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Impact of development on London's heritage Number and condition of designated heritage assets	KPI 11 AMR
22. Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	Extent of the area of Regionally Important Geological Sites (RIGS) designated in Local Plans in London	GiGL
23. Materials and waste	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high	Household waste recycling performance Non- Household waste recycling performance Value of sales and GVA in the low carbon and environmental goods and services sector	Environment Strategy Environment Strategy Environment Strategy Environment Strategy

Table 1: Monitoring Indicators			
IIA Objective		**Monitoring Measure**	**Source**
	reuse and recycling rates	No biodegradable or recyclable waste will be sent to landfill	
24. Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	Number of people adversely affected by noise	Environment Strategy

5.0 Conclusion

5.1 The replacement London Plan seeks to support the sustainable development of London. The Plan polices have been assessed by the IIA process to be a sustainable response to the pressures and challenges facing London, particularly to achieve Good Growth. The Inspectors' Panel concluded that:

> "Overall we therefore conclude that the IIA meets legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment."

5.2 It will be critical to ensure significant negative effects do not arise during implementation of the policies in the Plan. Ongoing annual monitoring and the use of the measures outlined above will serve as an effective way of reviewing the impacts and effectiveness of policies over time and of the plan as a whole.

5.3 The replacement London Plan, along with the IIA Report and this statement are available on the Mayor's website.

Further information can be found at: www.london.gov.uk

Comments are also welcome by email to: mayor@london.gov.uk

References:

[1] Also known as the SEA Directive "on the assessment of the effects of certain plans and programmes on the environment"
[2] Letter on the revocation of regional strategies Secretary of State DCLG 6 July 2010
[3] The Town and Country Planning (London Spatial Development Strategy) Regulations, 2000
[4] Draft replacement London Plan: Report of the Panel: Volume 1 - Report
[5] Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora
[6] Draft replacement London Plan: Report of the Panel: Volume 1 - Report. page 8
[7] http://www.london.gov.uk/priorities/planning/research-reports/annual-monitoring-reports
[8] The objectives are set out in full in Chapter 1 of the replacement Plan