### **Greater London Authority London Plan**

Integrated Impact Assessment: Addendum Report

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### Introduction

The draft London Plan and IIA were issued for consultation in December 2017. As a result of the consultation, the draft London Plan was amended to take account of the consultation and a Minor Suggested Change version of the Plan was published in August 2018. An IIA addendum report was also published alongside this, which assessed any changes to the draft London Plan policies as a result of the consultation.

The Plan then underwent an Examination in Public between January 2019 to May 2019. As a result of responding to participants' written statements and debate at the EiP, a set of Further Suggested Changes were proposed which were assessed against the IIA objectives. A consolidated version of the Plan, which incorporated all the minor and further suggested changes, was published in July 2019. This was then considered by the Panel of Inspectors.

The Inspectors issued their Panel Report on the Examination in Public of the London Plan in October 2019 which set out a number of recommendations. This IIA addendum report includes the assessments undertaken for the Further Suggested Changes as well as assessing the impact of the changes to the draft Plan of the Panel recommendations which the Mayor has decided to accept.

### **IIA Framework**

The Integrated Impact Assessment consists of four component assessments:

- Equalities Impact Assessment (EqIA)
- Strategic Environmental Assessment (SEA)
- Health Impact Assessment (HIA)
- Community Safety Impact Assessment (CSIA)

The purpose of the IIA is to assess the likely effects of the Plan's policies on a number of environmental, social and economic objectives – in order to further promote the positive impacts and to, ideally, mitigate any potential negative impacts of policies.

There are 24 objectives, each with a number of guide questions that correspond to one of the assessments above. For further details of the guide questions, see Appendix A.

Table 1 sets out a scoring related to the significance of the potential effects of the policies.

Table 1: Significance of Effect

Significance	of effect
++	Significant positive
+	Minor positive
О	Neutral

-	Minor negative
	Significant negative
?	Unknown
N/A	Not applicable

Unknown - This is where there is insufficient information to make a robust assessment.

N/A - This is where the objective is clearly not affected by the policy being assessed.

For each policy, there is a narrative setting out the impact of the changes on each of the relevant IIA objectives and a corresponding matrix where the changes have led to a revised scoring within the matrix.

Where policies have not been subject to Further Suggested Changes or Panel recommendations, or where the narrative has not led to a revised scoring in the matrix, the original matrixes either in the original IIA Report in November 2017 or the Minor Suggested Changes Addendum Report in July 2018 still stand.

### Summary of Changes – Further Suggested Changes and panel recommendations

Overall the majority of changes to policies, resulting from the Further Suggested Changes or panel recommendations, are likely to lead to more positive impacts / improved outcomes. In most cases these impacts are relatively minor. Although across all policies there are a range of objectives impacted, the main objectives affected have tended to be in the SEA or EqIA assessments and have focused on improved design outcomes, potential improvements to air quality, connectivity, or potentially improved outcomes in relation to equality and inclusion and social integration.

As a result of the Panel recommendation to reduce the borough housing targets, the overall spatial approach of the Plan – Sustainable Intensification - has been re-examined to assess the effects of this change.

Policies H2A Small housing developments and H9 Vacant building credit have also been deleted.

## Spatial Option

Chapter: Spatial Options Policy: Sustainable Intensification

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

- Reduction in housing targets from circa 650,000 homes between 2019- 2029 to circa 520,000 homes across the same period, against a need figure of circa 660,000. The reduction in targets is a result of the Panel recommendations on the deliverability of the small sites target this means that the distribution of housing growth changes from 45 per cent inner London and 55 per cent outer London to 51 per cent in inner London and 48 per cent in outer London.
- The Panel have recommended the reduction in targets for the Plan to be considered sound this means they find the Plan sound, despite it not meeting identified need.
- Paragraph 0.021 has been added to the Plan to set out that work will be undertaken to explore the
  potential options for meeting the identified need not met by this Plan. This is a matter for a future
  Plan and while there is no set timetable for such an alteration, as set out in the Inspectors' report,
  the Mayor envisages that the housing targets would need to be updated by 2024/25 (given they
  only run to 2029). Thus, while the Plan is a long term one and the IIA assesses the short, medium
  and long term, the long-term impacts may not be experienced as a revised Plan will be in place
  before then.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable land use

- A reduction in housing targets means that the targets in the Plan will not meet London's housing need in full terms of overall housing numbers. Not delivering the housing required to fully meet London's housing need could result in a continuation of overcrowding in the existing housing stock often affecting those on lower incomes or more people moving out of London due to affordability of the housing stock many of whom may continue to commute into London. It may also be the case that those who would otherwise move to London, chose not to because of the lack of housing options at the relevant price points. However, this would also be the case if it were not achievable to deliver the higher targets, something that is a key concern of the Inspectors.
- The draft Plan sought to meet housing need within London through intensification, which was considered to deliver benefits such as providing a critical mass to support social and physical infrastructure, including a more viable and efficient public transport network. Not meeting all of London's need in London could reduce some of those benefits. As has been observed over the last few years within London, population growth continues even without the housing to meet need. This can have negative consequences for an area as the population grows but without the benefit of contributions to CIL/s106, affordable housing, council tax receipts or New Homes Bonus that planned development would bring and can contribute to the delivery of infrastructure and services needed to support the larger population.
- More people moving out of London, but continuing to work in London, is likely to also mean greater commuting journeys. The extent of impacts will depend on the types of journeys made, however, commuting over longer distances decreases opportunities for walking and cycling and is likely to have impacts in relation to carbon emissions and air quality.
- However, as the majority of housing in this spatial option is focused in sustainable locations, and
  the Plan includes policies that seek to ensure that the infrastructure needed to support growth is
  delivered, overall the impacts are likely to continue to be positive over the short, medium and long
  term with some unknown impacts in the longer term.

### Matrix to be updated

### Objective 9 Connectivity

• The reduction in the overall housing target, meaning that the Plan does not plan to meet London's full housing need in terms of numbers of housing units, may result in a combination of a continuation/ increase in overcrowding in the existing housing stock and/or more people moving out of London. This could weaken the case for investment in additional infrastructure in certain circumstances. This could also mean this element of growth may not be focused in more sustainable locations. However, it is still considered that overall there will be positive impacts in terms of connectivity as a result of most of London's housing delivery being focused in sustainable locations, but there are unknowns in the longer term.

Matrix to be updated.

### Objective 10 Economic Competitiveness

- The reduction in the overall housing target, meaning that the Plan does not plan to meet London's full need in terms of number of units, may result in more overcrowding in the existing housing stock, which is more likely to affect those on lower incomes. This may negatively impact London's overall productivity through people's general health and well-being as these households are also more likely to suffer barriers to employment such as transport costs and other financial barriers.
- Alongside this, not meeting London's full housing need in terms of numbers of units may also result in more people moving out of London (or not moving to London in the first place), which may either increase people's commuting or alternatively force them to seek employment outside of London both of which could have a negatively impact on London's overall productivity. It could also mean these people lose their support networks such as family or friend's assistance in childcare provision, which could create further barriers to employment. However, due to housing delivery meeting the majority of need and targets being higher than in the current London Plan, overall it is still considered that this objective is likely to continue to be relatively positive with some unknowns in the longer term.

Matrix to be updated.

### Objective 11 – Infrastructure

• The reduction in the overall housing target, meaning that the Plan does not plan to meet London's full need in terms of numbers of units, may result in more overcrowding of the existing housing stock. Population growth without planned development is likely to have a negative impact on the provision of appropriate infrastructure, not only in lost revenue from CIL contributions, council tax receipts or New Homes Bonus that planned development brings but also in the ability of boroughs and service providers to plan for this growth in a managed way. However, as the majority of the growth is focused in the most sustainable locations, and the Plan contains policies on securing the infrastructure investment to support the growth that does occur, it is still considered that this objective will be relatively positive with some unknowns in the longer term.

Matrix to be updated.

### Objective 14 – Air quality and Objective 16 Climate Change

• The reduction in the overall housing target, meaning that the Plan does not plan to meet London's full need in terms of numbers of units, may lead to more overcrowding in the existing housing stock or people moving outside of London. Trends indicate overcrowding is more likely to take place in

outer London where the PTAL isn't as high or alternatively lead to people moving outside of London. Depending on how journeys are made within and outside of London, this could have the potential to lead to greater car use and/or longer journeys and potentially therefore impact on carbon emissions and air quality compared to what was planned for previously. The reduction in housing numbers could also reduce the case for investment in additional infrastructure that may have led to air quality and carbon emission improvements in certain circumstances.

No change to Matrix

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and Health Inequalities

• The reduction in the overall housing target may result in a continuation of overcrowding in the existing housing stock without necessarily the corresponding investment in infrastructure to meet the needs of the growing population. This may reduce some people's overall equity of access to health and social care services and facilities in some areas. However, due to housing targets meeting the majority of need and the policies in the Plan seeking to deliver the infrastructure required to support a growing population, overall this objective is still relatively positive with some unknowns in the longer term.

Matrix to be updated.

Objective 5 Housing Supply, Quality, Choice and Affordability

• The reduction in the overall housing target, meaning that the Plan does not plan to meet London's full need in terms of numbers of units, may result in a continuation of overcrowding in the existing housing stock. It may also lead to less affordable housing being delivered if the overall quantum of housing delivered is reduced. This is likely to negatively impact on levels of homelessness and overcrowding, thereby negatively impacting on people's mental and physical well-being. However, due to the targets in the Plan meeting the majority of need and significantly more than the current London Plan, overall this objective is still relatively positive with some unknowns in the longer term.

Matrix to be updated.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, age, race, gender, disabled.

b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion and Objective 2 Social Integration

- The lower housing targets could mean that there are fewer homes developed across London, including in areas of lower housing costs than would have been with the higher housing target.
  - The lower target may result in a continuation/increase of overcrowding in the existing housing stock or more people moving out of London (which may break up social and support networks). This may have a disproportionate impact on lower income, more vulnerable households, which are more likely to consist of people from BAME backgrounds, children, single parents mainly women the elderly and disabled people.
  - O Young people are also more likely to experience difficulties with housing costs. Younger Londoners therefore may be disproportionally affected by a lower small site housing target, with fewer homes delivered than could have been built in lower cost areas, and thus this policy could contribute less to helping to deliver mixed and inclusive communities than it would have with a higher housing target.
  - O However, the housing targets will be still be higher than the current published London Plan housing targets and significantly more than average delivery, so the approach has a potential positive/ uncertain impact in the short, medium and long term.
  - When taken in combination with the other elements of the sustainable intensification approach, it is considered that overall this objective continues to be positive, but with some unknowns in the longer term.

Matrix to be updated.

### Objective 3 Health and Health Inequalities

• Not meeting housing need, compared to meeting it in full, is likely to result in a continuation of overcrowding which may increase inequalities in people's physical and mental health and wellbeing and particularly affect people from BAME backgrounds, children, single parents – mainly women – older people and disabled people who are more likely to suffer from overcrowding (as discussed in Appendix three of response to Panel note 7.2). However, as the majority of the housing need will be met, and this is significantly more that the existing London Plan targets and average housing delivery, it is considered that overall this objective is still relatively positive with some unknowns in the longer term.

Matrix to be updated.

Objective 5 Housing Supply, Quality, Choice and Affordability

- The lower housing targets could mean that there are fewer homes, including potentially affordable homes, developed than would be the case with the higher targets and thus there will be a smaller reduction in homelessness and overcrowding over the Plan period.
- This change could potentially negatively affect BAME groups as they are likely to benefit from an increased supply of homes in general, and affordable homes in particular, because they are more likely to be living in poverty and/or in overcrowded housing<sup>2</sup>.
- Overcrowding is an issue that effects a range of Londoners but is more likely to affect households that include children, and single-parent families (which are most commonly headed by women<sup>3</sup>) thus a lower rate of housing delivery could disproportionality affect these groups.
- This change may also disproportionately impact LGBT+ youth who are more likely to be homeless than non-LGBT peers, given increased likelihood of familial rejection<sup>4</sup>.
- However, the housing targets will be still be higher than those in the current published London
  Plan and the new London Plan contains numerous policies that are designed to facilitate the supply
  of quality, affordable accommodation and increase choice within the market. Overall, there is a

positive impact in the short, medium and long term, but there are some unknowns in terms of the longer-term.

Matrix to be updated.

### Objective 10 Economic Competitiveness

- Not meeting housing need will mean some people's housing need will not be adequately met in London. This may negatively impact on London's overall productivity through people's general health and well-being and ability to live in London. This may have particular impacts on those with lower to middle incomes as the reduction in housing targets is mainly focused in outer London, where more of the new homes built are likely to be at lower price points than in central London.
- More people may have to move further away from employment opportunities and face longer and/or more expensive commutes. As these households are more likely to also suffer barriers to employment such as transport costs, this has the potential to exacerbate existing barriers. This is likely to affect people from BAME backgrounds, households with children, single parents mainly women older people and disabled people. This may therefore impact London's overall productivity, however, the other elements of the spatial option of focusing housing delivery and employment growth in the most sustainable locations is likely to mean this objective overall is still relatively positive with some unknowns in the longer term.

Update the matrix.

### Objective 11 – Infrastructure

• Evidence shows that the population has still grown despite housing growth not keeping pace, this is likely to continue. Population growth without planned development is likely to have a negative impact on the provision of appropriate infrastructure, not only in lost revenue from CIL contributions, council tax receipts or New Homes Bonus that planned development brings but also on the ability of boroughs and service providers to plan for this growth in a managed way. Lower housing numbers could also reduce the case for investment in additional infrastructure in certain circumstances. Whilst this will affect everyone's access to infrastructure and services, this is more likely to impact people such as disabled people, children and older people who often have more need to access certain types of infrastructure such as schools and health care than the general population. However, as the majority of the housing growth is focused in the most sustainable locations and the Plan includes policies that should ensure that the infrastructure required to support the housing growth is delivered, it is considered that this objective is still relatively positive with some unknowns in the longer term.

Matrix to be updated.

### **Sustainable Intensification**

IIA Element											]	IA Ob	jective	S										
~~.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA Short Term				1	I							ı	l		l		ı						1	
Snort Term						+	+		+	+	+	n/a	n/a	?	n/a	?	n/a	n/a	?/-	+	?/-	?/+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	?	n/a	?	n/a	n/a	?/-	+	?/-	?/+	n/a	n/a
Long Term						+/?	+		+/?	+/?	+/?	n/a	n/a	?	n/a	?	n/a	n/a	?/-	++	?/-	?/+	n/a	n/a
Direct / Indirect						D	D		I/D	D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	D	I/D	D	I	n/a	n/a
Temporary / Permanent						T/ P	T/ P		T/ P	T/ P	T/ P	n/a	n/a	T/ P	n/a	T/ P	n/a	n/a	T/ P	T/ P	T/ P	T/ P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L	L	L/ GL	n/a	n/a	L	n/a	L	n/a	n/a	L/ GL	L	L/ GL	L	n/a	n/a
EQIA						<u> </u>	<u> </u>		<u> </u>	<u> </u>	u u	l					l		GE	<u> </u>	u u	<u> </u>	<u> </u>	
Short Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Long Term	+/?	+/?	+/?	n/a	+/?	+	+	++	+	+/?	+/?	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	D	D	I/D	I/D	D	I/D	n/a	n/a	I	n/a		n/a	n/a	D	I/D	D	n/a	n/a	n/a
Temporary / Permanent	T/ P	T/ P	T/ P	n/a	T/ P	T/ P	T/ P	T/ P	T/ P	T/ P	T/ P	n/a	n/a	T/ P	n/a		n/a	n/a	T/ P	T/ P	T/ P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	L	L	L	L	L/ GL	n/a	n/a	L	n/a		n/a	n/a	L/ GL	L	L/ GL	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Medium Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Long Term	+	+	+/?		+/?				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		I/D				I/D	n/a				I	n/a		n/a	n/a		I/D	D	n/a		n/a
Temporary / Permanent	T/ P	T/ P	T/ P		T/ P				T/ P	n/a				T/ P	n/a		n/a	n/a		T/ P	T/ P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		n/a	n/a		L	L/ GL	n/a		n/a
CSIA																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

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### **Objective**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# Chapter 1 Good Growth

Chapter: 1 Good Growth	<b>Policy:</b> GG1 Strong and Inclusive Communities

### 1. Initial assessment:

- a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy (e.g. restructuring, clarification, strengthened policy on x)
- Addition of new clause to encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies.
- Inclusion of race in the list of Londoners' characteristics no material change

### **Panel Recommendation**

The GG policies are amended to be objectives – no material change

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

Encouraging early and inclusive engagement with a range of stakeholders in the development of
proposals, policies and area-based strategies is more likely to make the better use of land through more
appropriate development. Whilst early and inclusive engagement should on the whole provide a more
positive outcome in general - as it should take account of a range of views - there are still potential
unknowns as engagement does not always result in a desired outcome. This is likely to have a positive
or unknown impact in the short, medium and longer term.

Matrix to be updated.

### Objective 7 Design

• Encouraging early and inclusive engagement with a range of stakeholders is likely to help conserve and enhance the townscape/cityscape character by ensuring design considerations take into account the needs of a variety of users. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

Objective 20 Natural Capital and Natural Environment

Encouraging early and inclusive engagement with a range of stakeholders is likely to positively
contribute to helping to protect and enhance the character of local greenscapes by ensuring a range of
views are taking into consideration. This is likely to have positive impacts in the short, medium and
longer term.

Matrix to be updated.

### Objective 21 Historic Environment

• Encouraging early and inclusive engagement with a range of stakeholders, particularly stakeholders such Historic England and local amenity groups, is likely to help to ensure that new development respects, maintains and strengthens the local character and distinctiveness of a place by ensuring a range of views are taking into consideration. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4 Crime, safety and security

• Encouraging early and inclusive engagement with a range of stakeholders in the development of proposals, policies and area-based strategies is likely to result in the design of proposals that improve safety which will positively impact on perceptions of safety and fear of crime. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes.

b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• Encouraging early and inclusive engagement with a range of stakeholders could help to eliminate discrimination, advance equality of opportunity and provide opportunities for Londoners to actively participate in the city's life, decision making and communities. Language could be a barrier for those whose first language is not English to participating in consultation and engagement, but there are also other cultural or religion-specific reasons that may also have an impact too, for example, the day of the week or time of day may prevent certain religious groups from attending. Traditional engagement methods have not always been effective in reaching seldom heard groups. A more explicit emphasis on inclusive engagement and what that might entail may help to remove such barriers to participation. This may be particularly beneficial people aged 35-54 years old who are least likely to engage in the planning system<sup>1</sup> as well as disabled people who may face barriers to accessing engagement sessions, and as well as the groups listed above. This is likely to have positive impacts in the short term with more significant impacts in the medium and longer term.

Matrix to be updated.

Objective 7 Design

• Encouraging early and inclusive engagement with a range of stakeholders can help to make people feel positive about the area they live in and promote social integration, particularly for those groups who face barriers to participation and engagement or groups for whom traditional methods of engagement aren't particularly effective or relevant, for example seldom heard groups such as people aged 35-54 years old people, disabled people, people whose first language is not English. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

<sup>&</sup>lt;sup>1</sup> Ben Glover Sept 2019, People Powered Planning: How to better involve people in planning to get more homes built.

### Objective 21 Historic Environment

• In combination with other policies within the Plan such as D1 and HC1, encouraging early and inclusive engagement with a range of stakeholders will help facilitate communities to participate in the identification of key cultural features and areas. This is likely to be particularly beneficial to groups whose cultural interests are not traditionally represented such as BAME Londoners, Gypsies and Travellers, people from certain faith groups, and LGBT+ Londoners. This is likely to have unknown or positive impacts in the short, medium and longer term.

Matrix to be updated.

### **GG1 Strong and Inclusive Communities**

IIA Element	IIA Objectives																							
ii/ Lientene	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA						1																		
Short Term						?/+	+		+	+	+	+	n/a	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Medium Term						?/+	+		+	+	+	+	n/a	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Long Term						?/+	+		+	+	++	+	n/a	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Direct / Indirect						I/D	I/D		ı	I/D	I/D	ı	n/a	I/D	n/a	n/a	n/a							
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	Р	n/a	T/P	n/a	n/a	n/a							
Local / Greater London / Wider Region / Global						L/G L	L/G L		L/G L	L	L/G L	L	n/a	L/G L	n/a	n/a	n/a							
EQIA																								
Short Term	+	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	?/+	n/a	n/a	n/a
Medium Term	++	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	?/+	n/a	n/a	n/a
Long Term	++	++	+	+	++	+	+	++	++	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	?/+	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	D	I/D	n/a	n/a	I/D	I/D		I/D	I/D	I/D	I/D	I/D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	T/P		T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	L/G L	L/G L/ W	L/G L	L/G L	L/G L	L/G L	L/G L	n/a	n/a	L/G L	L/G L		L/G L	L/G L	L/G L	L/G L	L/G L	n/a	n/a	n/a
HIA	•		•	•		•										•								
Short Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	++	++	++		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	I/D		ı				I	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L		L/G L				L/G L	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA							1			<b>I</b>														
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					ı															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/G L															

### **Objective**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 1 Good Growth	<b>Policy:</b> GG2 Best Use of Land

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy (e.g. restructuring, clarification, strengthened policy on x)

- inclusion of 'sustainable' in overarching clause
- restructuring of clauses A and B to follow a more stepped sequential approach to identifying and prioritising land
- re-ordering of wording of clauses A and B for clarity
- inclusion of reference to determining the optimum development of capacity of sites

### **Panel Recommendation**

The GG policies are amended to be objectives – no material change

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 6 Sustainable Land Use

• The stepped approach of enabling certain types of sites and then prioritising these, based on their connectivity and other characteristics, before applying a design-led approach to their capacity based on optimising their density is likely to make the best and most efficient use of land so as to support more sustainable patterns and forms of development. This is likely to have positive impacts in the short and medium term with even stronger positive impacts in the longer term.

No change to the Matrix

### Objective 9 Connectivity

• The stepped approach and being more explicit as to the prioritisation of sites with good connectivity is likely to positively contribute to encouraging a modal shift to more sustainable forms of travel as by definition these sites will have more active travel options available. This is likely to have positive impacts in the short and medium term with even stronger positive impacts in the longer term.

No change to the Matrix

### Objective 10 Economic competitiveness and employment

• The stepped approach and being more explicit as to the prioritisation of sites with good connectivity is likely to positively contribute to maintaining London's economic competitiveness by facilitating the provision of the right type of employment land and floorspace in the right places. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

### Objective 11 Infrastructure

• The stepped approach and being more explicit as to the prioritisation of sites with good connectivity and the clarification of determining the optimum density of sites is likely to positively contribute to ensuring that the provision of environmental, social and physical infrastructure can support economic competitiveness and housing delivery. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

### Objective 14 Air Quality

• The stepped approach and being more explicit as to the prioritisation of sites with good connectivity is likely to positively contribute to improved air quality as there will be greater opportunity for people to use more active travel modes in places with good public transport connectivity which will help to reduce emissions. This is likely to have positive impacts in the short, medium and longer term. Therefore, overall the objective is likely to continue to be positive with some unknowns in short, medium and longer term.

Matrix to be updated.

Objective 16 Climate change adaptation and mitigation

• The stepped approach and being more explicit as to the prioritisation of sites with good connectivity is likely to positively contribute to improved air quality as there will be greater opportunity for people to use more active travel modes in places with good public transport connectivity which will help to reduce emissions and reduce transport's contribution to CO2 emissions. This is likely to have positive impacts in the short, medium and longer term. Therefore, overall the objective is likely to continue to be positive with some unknowns in short, medium and longer term.

Matrix to be updated.

### 3. HIA (Health Impact Assessment)

**3a.** are the changes likely to have an impact on any of the objectives with HIA guide questions? No Impacts.

- 4. CSIA (Community Safety Impact Assessment)
- **4a.** are the changes likely to have an impact on any of the objectives with CSIA guide questions? No Impacts.
- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No Impacts.

### **GG2** Best Use of Land

IIA Element												IIA Obj	ectives	<b>S</b>										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA		Į.										1	<u> </u>				ī						•	
Short Term						+	+		+	+	+	n/a	n/a	?/+	n/a	?/+	n/a	n/a	?/-	+	?/-	?/+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	?/+	n/a	?/+	n/a	n/a	?/-	+	?/-	?/+	n/a	n/a
Long Term						++	+		++	++	++	n/a	n/a	?/+	n/a	?/+	n/a	n/a	?/-	++	?/-	?/+	n/a	n/a
Direct / Indirect						D	D		I/D	D	I/D	n/a	n/a	I	n/a	I	n/a	n/a	D	I/D	D	ı	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global EQIA						L	L		L	L	L/G L	n/a	n/a	L	n/a	L	n/a	n/a	L/G L	L	L/G L	L	n/a	n/a
Short Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	+	+	+	+	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Long Term	+	++	+	n/a	+	+	+	++	+	++	++	n/a	n/a	?	n/a		n/a	n/a	?/-	+	?/-	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	D	D	I/D	I/D	D	I/D	n/a	n/a	I	n/a		n/a	n/a	D	I/D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	n/a	n/a	T/P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a						
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	L	L	L	L	L/G L	n/a	n/a	L	n/a		n/a	n/a	L/G L	L	L/G L	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Medium Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Long Term	+	+	++		+				+	n/a				+	n/a		n/a	n/a		+	?/-	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		I/D				I/D	n/a				1	n/a		n/a	n/a		I/D	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	n/a				T/P	n/a		n/a	n/a		T/P	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		n/a	n/a		L	L/G L	n/a		n/a
CSIA				ı		l	l				l	l			1	l	l			l			1	
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

### Objectives

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 1 Good Growth	<b>Policy:</b> GG3 Creating a healthy city, GG4 Delivering the homes Londoners need and GG6 Increasing efficiency and resilience
1. Initial assessment:	
brief summary of extent of changes and whether the policy	her the change is already reflected somewhere in
a. Further Suggested Changes	
N/a	
Panel Recommendation The GG policies are amended to be objectives – no	material change
2. SEA (Strategic Environmental Assessment)	
<b>2a. are the changes likely to have an impact o</b> No impacts	n any of the objectives with SEA guide questions?
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact o	n any of the objectives with HIA guide questions?
No Impacts	
4. CSIA (Community Safety Impact Assessme	nt)
4a. are the changes likely to have an impact o	n any of the objectives with CSIA guide questions?
No Impacts.	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on	one or more protected characteristics?
No Impacts.	
b. If yes, summarise the impact on the protec	ted characteristic(s).

Chapter: 1 Good Growth	<b>Policy:</b> GG5 Growing a Good Economy

### 1. Initial assessment:

### brief summary of extent of changes and whether the change is already reflected somewhere in the policy

### a. Further Suggested Changes

Inclusion of clause to recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.

### **Panel Recommendation**

The GG policies are amended to be objectives – no material change

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• The transition to a low carbon circular economy is likely to positively contribute to making better use of land through helping to promote sustainable development on brownfield land, including ensuring the use of more sustainable materials. This is likely to be positive in the short term and positive in the medium and longer term.

No change to the Matrix

### Objective 7 Design

• The transition to a low carbon circular economy is likely to positively contribute to the design objective ensuring that sustainable design and construction methods are promoted in the development process. This is likely to be positive in the short, medium and longer term.

No change to the Matrix

### Objective 10 Economic competitiveness and employment

• The transition to a low carbon circular economy may support a stronger and more resilient economic structure through the wider adoption of circular economy principles in developments in London. This is likely to be positive in the short, medium and longer term.

No change to the Matrix

### Objective 14 Air Quality

• The transition to a low carbon circular economy is likely to positively contribute to improving air quality through reducing emissions which will help to achieve national and international air quality standards. This is likely to be positive in the short, medium and longer term.

No change to the Matrix

### Objective 16 Climate Change

• The transition to a low carbon circular economy is likely to positively contribute to climate change by reducing the built environment's contribution to CO2 emissions and facilitating investment in green

technologies, equipment and infrastructure. This is likely to be positive in the short, medium and longer term.

No change to the Matrix

### Objective 17 Energy Use

• The transition to a low carbon circular economy is likely to positively contribute to helping to achieve greater energy efficiency and ensuring a more resilient and affordable energy system. This is likely to be positive in the short, medium and longer term.

Matrix to be updated.

### Objective 23 Waste and Materials

• The transition to a low carbon circular economy is likely to directly positively contribute to a reduction in waste and improvements in reuse, re-manufacturing and recycling rate as well as positively benefiting innovative waste management. This is likely to be positive in the short, medium and longer term.

Matrix to be updated.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 5 Housing Supply, Quality, Choice and Affordability

• The transition to a low carbon circular economy is likely to positively contribute to improving the energy efficiency of housing through more innovative and cost-effective solutions which will help to reduce fuel poverty and therefore indirectly contribute to the reduction of the potential of ill-health of occupiers – which will positively contribute to the objective of housing quality. This is likely to be positive in the short, medium and longer term.

No change to the Matrix

### Objective 14 Air Quality

The transition to a low carbon circular economy is likely to directly contribute to the promotion of
the sustainable use of materials and waste as well as reduced emissions from the movement of
materials and the extraction and production of virgin materials which is likely to contribute to
improved air quality and associated health impacts. This is likely to be positive in the short, medium
and longer term.

No change to the Matrix

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts.

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

No Impacts.

### GG5 Growing a good economy

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	1	ŀ	<b>i</b>	1	1				ı						<u> </u>			ī	1	ı				
Short Term						+	+		+	+	+	+	+	?/+	n/a	+/?	+	n/a	n/a	n/a	+	n/a	+	?
Medium Term						+	+		+	++	+	+	+	?/+	n/a	+/?	+	n/a	n/a	n/a	+	n/a	+	?
Long Term						+	+		+	++	+	++	+	?/+	n/a	+/?	+	n/a	n/a	n/a	+	n/a	+	?
Direct / Indirect						D	D		D	D	I	D	D	I	n/a	D	D	n/a	n/a	n/a	D	n/a	D	D
Temporary / Permanent						Р	Р		Р	T/P	T/P	Р	Р	Р	n/a	Р	Р	n/a	n/a	n/a	Р	n/a	Р	T/P
Local / Greater London / Wider Region / Global						L/G L	L/G L		L/G L	L/G L/ W	L	L/G L/ W	L/G L	L/G L/ W	n/a	L/G L	L/G L	n/a	n/a	n/a	L/G L	n/a	L/G L	L
EQIA															ı		ı —	ı	ı					
Short Term	+	+	+	n/a	+	+/?	+	+	+	+	+	+	+	?/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Medium Term	+	+	+	n/a	+	+/?	+	+	+	+	+	+	+	?/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Long Term	++	++	+	n/a	+	+/?	+	+	+	+	++	++	+	?/+	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	?
Direct / Indirect	I/D	I/D	I/D	n/a	ı	ı	ı	D	D	D	ı	D	D	ı	n/a		n/a	n/a	n/a	n/a	ı	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	Р	T/P	T/P	Р	Р	Р	n/a		n/a	n/a	n/a	n/a	Р	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L/ W	n/a	L	L	L/G L	L/G L	L/G L	L/G L/ W	L/G L/ W	L/G L/ W	L/G L	L/G L/ W	n/a		n/a	n/a	n/a	n/a	L/G L	n/a	n/a	L
HIA																								
Short Term	+	+	+		+				+	+				?/+	n/a		n/a	n/a		n/a	+	n/a		?
Medium Term	+	+	+		+				+	+				?/+	n/a		n/a	n/a		n/a	+	n/a		?
Long Term	+	+	+		+				+	+				?/+	n/a		n/a	n/a		n/a	+	n/a		?
Direct / Indirect	ı	I/D	D		ı				D	I				ı	n/a		n/a	n/a		n/a	D	n/a		I/D
Temporary / Permanent	Р	Р	Р		Р				Р	T/P				Р	n/a		n/a	n/a		n/a	Р	n/a		T/P
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L	L/G L/ W		L/G L				L/G L	L/G L/ W				L/G L/ W	n/a		n/a	n/a		n/a	L/G L	n/a		L
CSIA			•			•																		
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				ı					ı															
Temporary / Permanent				Р					Р															
Local / Greater London / Wider Region / Global				L/G L					L/G L															

### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# Chapter 2 Spatial Development Patterns

Chapter: 2 Spatial Development Patterns Policy: SD1 Opportunity Areas

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

- Inclusion of reference to encouraging the strategic remediation of contaminated land and taking appropriate measures
- Clarification that indicative housing and employments figures should be used to determine capacity of Opportunity Areas (OAs) but they are not necessarily minimums to be exceeded
- Clarification of the role of engagement and more explicit reference to collaboration at an early stage and throughout the process
- Minor changes to Table 2.1 no material change
- Updates to specific Opportunity Area descriptions no material change

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• Clarification of the use of indicative housing and employments figures in terms of determining the capacity of OAs is likely to contribute to sustainable land use, by making the best use of land through appropriate development on brownfield sites. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

### Objective 7 Design

• Clarification of the role of engagement and more explicit reference to collaboration at an early stage and throughout the process is likely to contribute to improving the wider built environment and creating a sense of place and vibrancy as well as encouraging a more inclusive design approach which takes into account the needs of a variety of users. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix

### Objective 22 Geology and Soils

Inclusion of references to encouraging the strategic remediation of contaminated land and taking
appropriate measures is likely to positively impact this objective by the restoration of degraded soil
and the prevention of further soil degradation or erosion. This will also help to contribute to
maximising the potential benefit of access to new employment and housing as a result of such
remediation. This is likely to have positive impacts in the short, medium and longer term. These
impacts are already reflected in the matrix.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 22 Geology and soils

• Inclusion of reference to encouraging the strategic remediation of contaminated land and taking appropriate measures is likely to positively contribute to the minimisation of the risk of health impacts through land contamination. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/a

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and inclusion

Clarification of the role of engagement and more explicit reference to collaboration at an early stage
and throughout the process is likely to positively contribute to equality and inclusion through
providing opportunities for Londoners to actively participate in the city's life and decision making.
This is likely to particularly benefit those who face barriers to participation, for example people
whose first language is not English, or people who face cultural or religion-specific barriers as well
help to reach groups that more traditional methods of engagement fail at. These impacts are more
positive in the short, medium and longer term. These impacts are already reflected in the matrix.

### **SD1 Opportunity Areas**

IIA Element												IIA Obj	ectives	<u> </u>										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1	1	1	•	1			1								•	1					
Short Term						+	+/?		+	+	+	n/a	n/a	0/+	0/+	0/+	+/?	n/a	+	+	+/?	+	n/a	n/a
Medium Term						+	+/?		+	+	+	n/a	n/a	0/+	0/+	0/+	+/?	n/a	+	+	+	+	n/a	n/a
Long Term						++	+/?		+	++	+	n/a	n/a	0/+	0/+	0/+	+/?	n/a	+	+	+	+	n/a	n/a
Direct / Indirect						ı	I		I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I	n/a	I/D	I/D	ı	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/G L	L/G L	L/G L	n/a	n/a	L	L/G L/ W	L	L	n/a	L/G L	L/G L	L	L	n/a	n/a
EQIA																								
Short Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	0/+	0/+		n/a	n/a	n/a	0/+	n/a	n/a	n/a	+
Medium Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	0/+	0/+		n/a	n/a	n/a	0/+	n/a	n/a	n/a	+
Long Term	+	+	+	?	++	++	?	+	++	++	+	n/a	?	0/+	0/+		n/a	n/a	n/a	0/+	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	D	I	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D		n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	n/a	L/G L	L/G L	L/G L/ W		n/a	n/a	n/a	L/G L	n/a	n/a	n/a	L/G L
HIA		•		•															•		•	_		
Short Term	+	+	+		+				+	n/a				0/+	0/+		0	n/a		0/+	n/a	+		+
Medium Term	+	+	+		+				+	n/a				0/+	0/+		+	n/a		0/+	n/a	+		+
Long Term	+	+	+		++				+	n/a				0/+	0/+		+	n/a		0/+	n/a	+		+
Direct / Indirect	D	D	D		D				D	n/a				I/D	I/D		D	n/a		D	n/a	I		D
Temporary / Permanent	Р	Р	Р		Р				T/P	n/a				T/P	T/P		Р	n/a		Р	n/a	T/P		Р
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L/ W		L/G L/ W				L/G L/ W	n/a				L/G L/ W	L/G L/ W		L/G L/ W	n/a		L/G L/ W	n/a	L/G L/ W		L/G L/ W
CSIA		•																						
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

### **Objectives**

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- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> Chapter 2 Spatial development patterns	<b>Policy:</b> SD3 Growth Locations in the Wider South East
	and beyond

- 1. Initial assessment:
- a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

No FSCs. No impacts.

### b. Panel Recommendations

In order to address in part the Panel Recommendation PR4, a small amendment is proposed to the supporting text (paragraph 2.3.8A) of policy SD3 in relation to Figure 2.15 and the 13 initial Wider South East Strategic Infrastructure Priorities: The supporting text should include the cross reference that those schemes that can be linked to London's public transport system are also reflected in table 10.1 of chapter 10 of the plan. The addition of this cross reference to another part of the Plan is not considered to change the impacts in relation to objectives already identified or result in further changes to the scoring matrix.

- 2. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts.

- 3. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts.

- 4. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No impacts.

<b>Chapter:</b> 2 Spatial development patterns	<b>Policy:</b> SD4 The Central Activities Zone (CAZ)

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification that adaptation and diversification of retail destinations should be supported including locallyorientated retail and related uses.

Insertion of 'quality and character' and deletion of 'attractions' providing clarity— no material change.

Amendment to rename Isle of Dogs (North) to Northern Isle of Dogs for accuracy and consistency – no material change.

References in the supporting text:

- Deletion of text, making the paragraph more concise and readable (para 2.4.5) no material change
- Inclusion of reference to pedestrianisation of Oxford Street
- Additional text to recognise that specialist retail destinations/clusters within the CAZ may include retail and related facilities that serve specific communities

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 14: Air Quality

The modification to SD4 F and amendment to paragraph 2.4.7 to include reference to the pedestrianisation of Oxford Street is likely to have a positive impact on air quality through the reduction in vehicles in the area and associated reduction in emissions. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the scoring of the matrices.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 14: Air Quality

The modification to SD4F and amendment to paragraph 2.4.7 to include reference to the pedestrianisation of Oxford Street is likely to have a positive impact on air quality through the reduction in vehicles in the area and associated reduction in emissions. This is likely to have positive impacts in the short, medium and longer term.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

### Objective 1: Equality and Inclusion

The additional text in para 2.4.10 refers to retail and related facilities that serve specific communities – this is likely to have a positive impact for certain groups who would come under the protected characteristics of race or religion, in terms of their access to particular foods and other cultural facilities. This is likely to have positive impacts in the short, medium and longer term. These likely impacts are already reflected in the matrix.

### **SD4 Central Activity Zone**

IIA Element													ectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA		1	1	1	1										1	1		ı	ı					
Short Term						+	+		+	+	+	0	+	0	0	0	n/a	n/a	n/a	0	+	+	n/a	-
Medium Term						+	+		+	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Long Term						+	+		++	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Direct / Indirect						ı	I/D		I/D	I/D	I/D	I/D	I/D	ı	ı	I	n/a	n/a	n/a	I/D	I/D	D	n/a	D
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P	Р	n/a	T/ P
Local / Greater London / Wider Region / Global						L/G L/ W	L/G L		L/G L	L/G L	L/G L/ W	L/G L	L/G L	L	L/G L	L	n/a	n/a	n/a	L/G L/ W	L	L	n/a	L
EQIA																								
Short Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	0	0		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Medium Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Long Term	++	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I	I/D		n/a	n/a	n/a	I/D	I/D	n/a	n/a	D
Temporary / Permanent	Р	Р	Р	T/P	T/P	T/P	P/T	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P		n/a	n/a	n/a	T/P	T/P	n/a	n/a	T/ P
Local / Greater London / Wider Region / Global	L	L	L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L	L/G L		n/a	n/a	n/a	L/G L	L	n/a	n/a	L
HIA																								
Short Term	+	+	+		?				+	n/a				+	0		n/a	n/a		+	0	n/a		-
Medium Term	+	+	+		?				+	n/a				+	0		n/a	n/a		+	0	n/a		-
Long Term	+	+	+		?				+	n/a				+	0		n/a	n/a		+	0	n/a		-
Temporary / Permanent	I/D	I/D	I/D		D				D	n/a				D	ı		n/a	n/a		D	D	n/a		D
Direct / Indirect	Р	Р	Р		Р				Р	n/a				T/P	T/P		n/a	n/a		T/P	T/P	n/a		T/ P
Local / Greater London / Wider Region / Global	L	L	L		L/G L				L/G L	n/a				L/ GL	L/G L		n/a	n/a		L/ GL	L	n/a		L
CSIA																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/G L					L															

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### **Objectives**

- 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
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- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 2 Spatial development patterns	<b>Policy:</b> SD5 Offices, other strategic functions and
	residential development in the CAZ

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification of SD5 E, removing the need to define detailed boundaries, placing the requirement on boroughs to identify areas in Part C of the policy (i.e. those areas where offices and other CAZ strategic functions are to be given greater weight relative to new residential development) – no material change.

Insertion of text to SD5 G to clarify those areas where support should be given to mixed-use office/residential proposals that provide an equivalent or net increase in office floorspace. This change effectively excludes wholly residential streets and predominantly residential neighbourhoods from the areas where this should be applied.

References in the supporting text:

• Restructuring of para 2.5.3 to clarify that the CAZ should not be compromised by new residential development, which should be reflected in local plans – no material change.

### **Panel Recommendation change**

Modification to remove reference to "detailed boundaries" allowing relevant boroughs greater flexibility in applying the policy in their Local Development Plan Document. This would not affect the outcomes of the policy.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10: Economic competitiveness and employment

The changes to SD5 G are likely to have a positive impact on London's economic competitiveness, ensuring there is sufficient supply of office floorspace. This is likely to have positive impacts in the short, medium and longer term, these are already reflected in the scoring of the matrices.

### **Panel Recommendation changes**

Objective 10: Economic competitiveness and employment

The Panel Recommendation change could reduce developers' certainty of delivering non-residential uses in the CAZ and as such could be considered to have a minor negative impact on this objective. Overall, the policy supports a strong, diverse and resilient economy and this is currently reflected in the matrix.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

- 5. EqIA Equality Impact Assessment
- ${\bf a.}$  are the changes likely to have an impact on one or more protected characteristics? No impacts
- b. If yes, summarise the impact on the protected characteristic(s).

Chapter: 2 Spatial development Patterns	Policy: SD6 Town centres and high streets
1. Initial assessment:	
a. brief summary of extent of changes and v the policy	whether the change is already reflected somewhere in
• •	e business space to reflect Policy E2; the name of which has ing suitable business space – no material change.
any town centres located wholly within th CAZ – no material change	n why the policy does not apply to CAZ Retail Clusters or he CAZ and refers to other policies that are specific to the ding throughout the Plan – factual change – no material
2. SEA (Strategic Environmental Assessmen	nt)
2a. are the changes likely to have an impact	on any of the objectives with SEA guide questions?
N/A	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact	on any of the objectives with HIA guide questions?
N/A	
4. CSIA (Community Safety Impact Assessn	nent)
4a. are the changes likely to have an impact	on any of the objectives with CSIA guide questions?
N/A	
5. EqIA - Equality Impact Assessment	

a. are the changes likely to have an impact on one or more protected characteristics?

b. If yes, summarise the impact on the protected characteristic(s).

N/A

Chapter: 2 Spatial development Patterns	<b>Policy:</b> SD7 Town centres: development principles and
	Development Plan Documents

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part A and Part AB1-3 – Restructuring and additional text to clarify how boroughs should take a town centres approach in development plans and in consideration of development proposals in line with the National Planning Policy Framework (NPPF) -. Whilst the wording more clearly reflects the NPPF and the sequential test, the intention of the policy is as originally drafted - no material change.

Part AB4 – Additional clause clarifying the approach boroughs should take to accommodating identified deficiencies in capacity through enabling future potential town centres.

Part B 1A - Deletion of the term 'neighbourhood centres' to avoid any potential conflicts with designations made at a local level – no material change.

Part C2 - Deletion of wording requiring the marketing of commercial space at rental levels related to demand in the area or similar surrounding properties.

References in the supporting text:

- To provide clarification in light of restructuring the policy no material change.
- To explain and justify the approach to accommodating identified deficiencies in future potential centres.
- Renumbering of a paragraph and footnote referring to SD6 no material change.
- Insertion of text that assessments should consider the impact of existing, committed and planned public and private investment and the impact on town centre vitality and viability, in line with the NPPF no material change.
- Insertion of text highlighting the importance of meeting London's diverse needs in terms of retail, specialist shops and services.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6: Sustainable Land Use

The additional clause within Part AB4 would direct development to future potential town centres, in accordance with the sequential test, and as such would be considered sustainable use of land, making the best use of land in suitable locations and in areas that would be served with public transport. This would have a positive impact on this objective within the SEA – which is already largely reflected in the matrix, however the impacts will also be on a Greater London scale.

Objective 7: Design

The insertion of Part AB4 is likely to have a positive impact on this objective as it would help achieve mixed use neighbourhoods, a sense of place and vibrancy and create a safe and attractive public realm, improving the wider built environment as part of any future potential centre. This is likely to have a positive impact in the short, medium and longer term. The matrix has been updated to reflect this.

Objective 9: Connectivity

Part AB4 is likely to result in a sustainable pattern of development that benefits from public transport connectivity, which would likely reduce traffic volumes – with future potential centres being the focus of

retail and other main town centre uses as well as sustainable transport modes. This is likely to have positive impacts in the short, medium and longer term. This is already reflected in the matrix – no change required.

Objective 10: Economic competitiveness and employment

Deletion of wording requiring the marketing of commercial space at rental levels related to demand in the area or similar surrounding properties (SD7 C2) could reduce the quantity of more affordable commercial floorspace coming forward and therefore restrict some potential occupiers from acquiring space. This would have an impact on objective 10 which refers to facilitating the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive. This is likely to have a minor negative impact in the short, medium and long term.

The insertion of Part AB4 would likely have a positive impact on objective 10 in supporting a strong, diverse and resilient economy in providing future potential centres generating jobs and supporting small and local retail offers. This is likely to have positive impacts in the short, medium and longer term.

Considering the amendments to the policy overall, it is likely the policy would have minor positive impacts in the short, medium and long term and the matrix has been updated to reflect this.

Objective 11: Infrastructure

Part AB4 would result in the need for additional infrastructure that would support economic competitiveness and enable housing delivery within and adjacent to future potential town centres and thus have a likely positive impact on this objective. This is already identified as a positive impact within the matrix and so no change is required.

Objective 14: Air Quality

The inclusion of future potential town centres set out in Part AB4 would enable sustainable development patterns and as such reduce the need for travel by car. This would likely have a positive impact on London's air quality. This is already largely reflected in the matrix; however this is likely to be of Greater London scale.

Objective 16: Climate change adaptation and mitigation

Part AB4 would enable sustainable patterns of development and reduce the need to travel by car through future potential town centres being developed. As such, this would have a likely positive impact on this objective which seeks to reduce transport's contribution to CO<sub>2</sub> emissions and help London meets its emissions targets. This is already largely reflected in the matrix but will also be on a Greater London scale.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impact.

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact.

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic
Disability
Age
Sex
Race
Religion
Sexual orientation
Gender reassignment
Marriage & civil partnership
Pregnancy & maternity

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 10: Economic competitiveness and employment

This objective seeks to help provide employment opportunities, particularly to disadvantaged groups. The changes to SD7 C2 would have likely impacts on a number of groups who would come under a protected characteristic, particularly those of race and disability. Access to finance can be difficult for Black Africans and Bangladeshis who tend to have poorer credit outcomes, and for disabled entrepreneurs driven by lower incomes and poorer credit ratings<sup>1</sup>. The change to SD7 C2 could prevent these groups from accessing more affordable business units. However taking the policy as a whole, it is likely it would result in the provision of a range of commercial space including a range of unit sizes likely to serve the needs of different groups. This is already reflected in the matrix.

<sup>&</sup>lt;sup>1</sup> GLA Intelligence (2019) Equality, diversity and inclusion evidence base for London

#### **SD7 Town Centre Development Principles and Local Plans**

IIA Element												IIA Obj	jectives	S										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																1	<u> </u>						_	
Short Term						+	+		+	+	+	n/a	+	0	n/a	0	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		+	+	+	n/a	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						ı	I/D		I/D	D	I/D	n/a	I	ı	n/a	ı	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	Р	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L/G	L/G L		L/G L	L/G	L/G L	n/a	L	L/G L	n/a	L/G L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA	-					-	8		!								8	!	!	!				•
Short Term	+	+	?	?	+/?	+/?	+/?	+	+	+/?	+	n/a	?	0	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Medium Term	+	+	?	?	+	+/?	+/?	+	+	+/?	+	n/a	+/?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Long Term	++	++	?	?	+	+/?	+/?	+	+	+/?	++	n/a	+/?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I	I	I/D	I/D	I/D	I/D	I/D	I/D	С	n/a	I/D	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	ı
Temporary / Permanent	Р	Р	T/P	T/P	Р	Р	Р	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	L/G L	n/a	L	L/G L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L						
HIA																								
Short Term	+	+	+		0				+	+/?				0	n/a		n/a	n/a		n/a	n/a	n/a		0
Medium Term	+	+	+		+/?				+	+/?				0	n/a		n/a	n/a		n/a	n/a	n/a		0
Long Term	+	+	+		+				+	+/?				+	n/a		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	I/D				D	n/a		n/a	n/a		n/a	n/a	n/a		
Temporary / Permanent	Р	Р	Р		Р				Р	T/P				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L				L/G L	L/G L				L	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA								1																
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

#### **Objectives**

- 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
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

References in policy:

- Addition of new clause AA to clarify the Mayor's role in regeneration.
- Clarified in part A(2A) that boroughs should collaborate with communities throughout the development of local development documents, strategies and regeneration programmes.

#### References in supporting text:

- Clarified that for regeneration initiatives to contribute to good growth it is important that they tackle poverty, disadvantage, inequality and causes of deprivation, address social, economic and environmental barriers and benefit existing residents and business.
- Clarified that baseline social, economic and environmental information should be used to inform the preparation and monitoring of local plans and regeneration strategies.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

#### Objective 6 Sustainable Land Use

• Encouraging early collaborative engagement with communities in the development of policies and area-based strategies and regeneration programmes is more likely to make better use of land through more appropriate development. Whilst early collaborative engagement should provide a more positive outcome generally, enabling a range of views to be considered, there are still potential unknows as engagement does not always result in a desired outcome. This is likely to have a questionable minor positive impact in the short, medium and longer term, the matrix has been updated to reflect this.

#### Objective 7 Design

- Clarifying that it is important that regeneration initiatives help to tackle environmental barriers and benefit existing residents is likely to help develop policies, strategies and regeneration programmes that consider the existing barriers of the physical environment and how these can be improved to best serve existing and future residents in areas of regeneration. This is likely to have positive impacts in the short, medium and longer term, the matrix has been updated to reflect this.
- Encouraging early collaborative engagement with communities in the development of policies and area-based strategies and regeneration programmes is more likely to help conserve and enhance townscape/cityscape character by ensuring design considerations reflect the needs of a variety of users. Whilst early collaborative engagement should provide a more positive outcome generally, enabling a range of views to be considered, there are still potential unknows as engagement does not always result in a desired outcome. This is likely to have a questionable minor positive impact in the short, medium and longer term, the matrix has been updated to reflect this.

# Objective 10 Economic competitiveness and employment

• Clarifying that it is important that regeneration initiatives address economic barriers to existing residents to help benefit existing residents and businesses is likely to help ensure that these initiatives positively contribute to the generation of new jobs to help reduce overall unemployment including long-term and youth unemployment. This is likely to have a minor positive impact in the short, medium and long term, the matrix has been updated to reflect this.

#### Objective 20 Natural Capital and Natural Environment

- Clarifying that it is important that regeneration initiatives address environmental barriers and benefit existing residents is likely to help ensure that these initiatives positively contribute to the protection and enhancement of the character of local greenspaces by ensuring this is a consideration. This is likely to have a minor positive impact in the short, medium and long term, the matrix has been updated to reflect this.
- Encouraging early collaborative engagement with communities in the development of policies and area-based strategies and regeneration programmes is more likely to positively contribute to helping protect and enhance the character of local greenspaces by ensuring a range of views are taken into consideration. Whilst early collaborative engagement should provide a more positive outcome generally, enabling a range of views to be considered, there are still potential unknows as engagement does not always result in a desired outcome. This is likely to have a questionable minor positive impact in the short, medium and longer term, the matrix has been updated to reflect this.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion

• Encouraging early collaborative engagement with communities in the development of local development documents, strategies and regeneration programmes is likely to help provide greater opportunities for local communities to participate in their development. This is likely to help communities voice what opportunities they need to lead active, fulfilling lives, helping boroughs to understand what communities need when developing their policies, area-based strategies and regeneration programmes. This is likely to have minor positive impacts in the short to medium term and significantly positive impacts in the longer term, the matrix has been updated to reflect this.

#### Objective 3 Health and health inequalities

• Clarifying that it is important that regeneration initiatives help to tackle disadvantage, inequality and causes of deprivation is likely to help develop policies, strategies and regeneration programmes that are informed by the known health and wellbeing inequalities of communities. This is likely to have a minor positive impact in the short to medium term and a significantly positive impact in the longer term, these impacts are already reflected in the matrix.

#### 4. CSIA (Community Safety Impact Assessment)

4a are these changes likely to have an impact on any of the objectives within the CSIA guide questions?

No impacts.

# 5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

#### 5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• Encouraging early and collaborative engagement with communities could help to eliminate discrimination, advance equality of opportunity and provide opportunities for Londoners to actively participate in the city's life, decision making and communities. Language could be a barrier for those whose first language is not English to participating in consultation and engagement, but there are also other cultural or religion specific reasons that may also have an impact too; for example, the day of the week or time of day may prevent certain religious groups from attending. Traditional engagement methods have not always been effective in reaching seldom heard groups. A more explicit emphasis on collaborative engagement and what that might entail may help to remove such barriers to participation. This may be particularly beneficial people aged 35-54 years

old who are least likely to engage in the planning system<sup>1</sup> as well as disabled people who may face barriers to accessing engagement sessions. This is likely to have positive impacts in the short term and significantly positive impacts in the medium to longer term, these impacts are already reflected in the matrix.

#### Objective 3 Health and health inequalities

• Clarifying that it is important that regeneration initiatives help to tackle disadvantage, inequality and causes of deprivation is likely to help develop policies, strategies and regeneration programmes that are informed by the known health and wellbeing inequalities of communities. This is likely to help reduce mental health and wellbeing inequalities faced by many older people and disabled people who often have more complex health needs<sup>2,</sup> as well as people who come under the protected characteristic of gender reassignment who face barriers to accessing health services<sup>3</sup>. This is likely to have a minor positive impact in the short to medium term and a significantly positive impact in the longer term, these impacts are already reflected in the matrix.

#### Objective 7 Design

• Clarifying that it is important that regeneration initiatives help to tackle environmental barriers and benefit existing residents is likely to help develop policies, strategies and regeneration programmes that consider the existing barriers of the physical environment and how these can be improved to best serve existing and future residents in areas of regeneration. This is likely to help contribute to improved legibility and ease of use of the built environment for people with sensory or cognitive impairments. This is particularly likely to benefit disabled people<sup>4</sup> and older people who may experience poorer health<sup>5</sup> or are more likely to be living with certain conditions such as dementia. This is likely to have positive impacts in the short, medium and longer term, these impacts are already reflected in the matrix.

# Objective 10 Economic competitiveness and employment

• Clarifying that it is important that regeneration initiatives address economic barriers to help benefit existing residents and businesses is likely to help ensure these initiatives positively contribute to the generation of new jobs to help reduce overall unemployment including long-term and youth unemployment. This is likely to help improve employment opportunities for women who generally experience a higher unemployment rate than men<sup>6</sup> and young people who experience the highest rate of unemployment in London which generally falls as age increases<sup>7</sup> This is likely to have a minor positive impact in the short, medium and long term, these impacts are already reflected in the matrix.

<sup>&</sup>lt;sup>1</sup> Ben Glover Sept 2019, People Powered Planning: How to better involve people in planning to get more homes built.

<sup>&</sup>lt;sup>2</sup> EHRC 2016, Is England Fairer? The state of equality and human rights 2016

<sup>&</sup>lt;sup>3</sup> EHRC (2016) Is England Fairer? The state of equality and human rights in 2016.

<sup>&</sup>lt;sup>4</sup> Matthews et al (2015) The impact of street accessibility on travel and independence for disabled people

<sup>&</sup>lt;sup>5</sup> King's College London (2015) An Age Friendly City – how far has London come?

<sup>&</sup>lt;sup>6</sup> NLP/EC/001Economic Evidence Base 2016 (GLA Economics, Nov 2016)

<sup>&</sup>lt;sup>7</sup> NLP/EC/001Economic Evidence Base 2016 (GLA Economics, Nov 2016)

#### **SD10 Strategic and Local Regeneration**

IIA Element												IIA Obj	ectives	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+ /?	+		+	+	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	+/?	?	+	n/a	n/a
Medium Term						+ /?	+		+	+	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	+/?	?	+	n/a	n/a
Long Term						+ /?	+		+	+	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	+/?	?	+	n/a	n/a
Temporary / Permanent						T/P	T/P		I/D	I/D	I/D	I/D	D	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D	D	n/a	n/a
Direct / Indirect						I/D	I/D		T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L	GL		L/G L	L/G L	L/G L	L/G L	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	L/G L	L	n/a	n/a
EQIA																								
Short Term	+	+	+	?	?	+/?	+	+	+	+/0	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Medium Term	++	+	+	?	?	+	+	+	+	+/0	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Long Term	++	++	++	?	?	+	+	+	+	+/0	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Temporary / Permanent	D	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	I/D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	L/G L	n/a	n/a		n/a	n/a	n/a	L/G L	L/G L	n/a	n/a	n/a								
HIA																						1		
Short Term	+	+	+		0				n/a	n/a				0/+	n/a		n/a	n/a		0	0	n/a		n/a
Medium Term	+	+	+		0				n/a	n/a				0/+	n/a	1	n/a	n/a		0	0	n/a		n/a
Long Term	++	+	++		0				n/a	n/a				0/+	n/a		n/a	n/a		0	0	n/a		n/a
Temporary / Permanent	D	D	D		I				n/a	n/a				ı	n/a		n/a	n/a		ı	I	n/a		n/a
Direct / Indirect	T/P	T/P	T/P		Р				n/a	n/a				Р	n/a		n/a	n/a		Р	Р	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		L/G L				n/a	n/a				L/G L	n/a		n/a	n/a		L/G L	L/G L	n/a		n/a
CSIA																								
Short Term				?					?															
Medium Term				?					?															
Long Term				?					?															
Temporary / Permanent				I/D					I/D															
Direct / Indirect				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

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#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# Chapter 3 Design

Chapter: 3 Design	<b>Policy:</b> D1 London's form, character and capacity for
	growth. New Matrix Required

#### Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### Overview of proposed changes (Policies D1, D2 and D6):

Structural changes to Policies D1, D2 and D6 have been made to provide a stronger narrative and clarity as to how to be implemented. There are now 4 distinct policies (Policies D1, D1A, D1B and D2).

#### Policy D1, London's form, character and capacity for growth

- Firstly, it sets out a requirement for boroughs to undertake 'area assessments' to define the characteristics, qualities and value of different places within the plan area and also to develop an understanding of different areas' capacity for future growth. This requirement was previously included in the original Policy D2 part A. No material change.
- Secondly, it requires boroughs to proactively prepare local plans that meet their growth requirements drawing on 'area assessments' to identify suitable locations for growth and the potential scale of that growth based on the existing and planned future infrastructure capacity. These requirements were previously set out in the original Policy D2 part B and D6 parts AA and B. No material change.

#### Main changes made within Policy D1 London's form, character and capacity for growth

- Revised title.
- Part A clarifies 'Area assessments' should include assessment and understanding of 'land uses' an 'views and landmarks'.
- Part B provides an explicit instruction for boroughs to proactively plan to meet their growth requirements. This includes setting out areas suitable for growth and the appropriate scale of future growth (limited, moderate or extensive).
- Part B clarifies that boroughs should use site allocations to proactively plan to meet their growth requirements and these should set out parameters for development that optimise the capacity of sites following the design-led approach.
- The proposed amendments in the supporting text expands upon the new policy requirements, including how local communities should be involved).

# • SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 6 Sustainable land use

 Restructuring the policy to make it as clearer about how London can meet its capacity for growth is likely to help to ensure that the best use of land is made in the future, by encouraging appropriate development to come forward through the use of a design-led approach. This is likely to have an indirect minor positive impact in the short (+), medium (+) and longer term (+) that will/would be permanent and relevant at the Local Level and for Greater London. Matrix to be drafted to reflect this.

#### Objective 7 Design

- Restructuring the policy, and revising to make explicit reference to ensuring a design-led approach to determining capacity is likely to contribute to the promotion of sustainable growth, thereby positively contributing to good design.
- Inclusion of land uses and views and landmarks as elements to be considered when undertaking area
  assessments will help to ensure that boroughs' evidence bases, on which planning decisions will be
  made, will be more robust. This should encourage a more inclusive design approach and help to
  improve the wider built environment by encouraging future development that responds to the
  positive characteristics and qualities of a place, and what people value about it.

Overall these impacts are likely to have an indirect positive impact in the short (+) and medium term (+) and longer term (++) that will be permanent and relevant at the Local Level and for Greater London. Matrix to be drafted to reflect this.

#### Objective 11 Infrastructure

• The more explicit link between capacity for growth being determined by existing and future infrastructure capacity is likely to positively contribute to this objective and help to unlock land that has capacity for housing development. This is likely to have an indirect positive impact in the short (+), medium term (+) and longer term (+) that will be permanent and relevant at the Local Level and for Greater London. Matrix to be drafted to reflect this.

#### HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 5 Housing supply, quality, choice and affordability

• Greater clarity on how area-based assessments should be undertaken is likely to help to ensure that future housing will be of a quantum, type, quality and tenure that meets demographic and household demand. This may positively contribute to reducing housing-related stresses such as homelessness or overcrowding. This should result in an indirect/direct positive impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level and Greater London. Matrix to be drafted to reflect this.

#### • CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 Connectivity

- More explicitly linking the growth of an area with existing and future infrastructure capacity is likely
  to positively contribute to the enhancement and improvement of connectivity to, from, within and
  around London and increase the proportion of journeys made by sustainable active transport modes.
- Using the design-led approach is likely to help ensure that the design of places is more able to integrate measures that encourage active travel by creating safe, attractive routes based on an understanding of the local character and context developed as part of the area assessment.

Overall this should result in an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, Greater London, and the wider region. Matrix to be drafted to reflect this.

#### • EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics?** Yes, for: disability, age, sex, and race.

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• Clarifying the process that boroughs need to go through to identify capacity for growth and specifically identifying that this process should involve engagement with the community will provide opportunities for Londoners to actively participate in the city's life, decision making and communities. A design-led approach may also positively contribute towards promoting a culture of equality, fairness and respect

for people and the environment and the creation of more inclusive places that support and enable social interaction. This is likely to be beneficial for groups who are at higher risk of social isolation such as BAME Londoners aged 20-24 years, disabled and older Londoners and men<sup>1</sup>. This is likely to a have indirect positive permanent impacts in the short term (+), medium term (+) and long term (++) relevant at a Local level and Greater London. Matrix to be drafted to reflect this.

#### Objective 2 Social integration

• Clarifying the process that boroughs need to go through to identify their capacity for growth and specifically identifying that this process should include engagement with the community is likely to positively contribute to providing opportunities for Londoners to actively participate in the city's life and decision making. This is likely to be particularly beneficial for people who are more at risk of social isolation such as older Londoners, particularly BAME Londoners aged 20-24 years, disabled and older Londoners and men<sup>2</sup>. This should result in an indirect beneficial impact in the short term (+), medium term (+) and long term (++). The impact should be permanent and relevant at a Local level, and Greater London. Matrix to be drafted to reflect this.

#### Objective 5 Housing Supply, Quality, Choice and Affordability

- A design-led approach should help to ensure accessible and adaptable housing is delivered, so improving choice for many older and disabled people who require it. It will also help to create places that people want to live in and spend time in partaking in activities which promote play, relaxation and physical activity which could increase opportunities for social interaction. This could have a positive impact on reducing social isolation that some parents of very young children can experience, as well as BAME Londoners aged 20-24 years, disabled and older Londoners and men<sup>3</sup>.
- Providing explicit instructions for boroughs about how to establish the appropriate scale of future growth in different areas (e.g. limited, moderate or extensive growth) will help to ensure that future housing will be of a quantum, type, quality and tenure that meets demographic and household demand and addresses many housing-related stresses such as homelessness or overcrowding which affects a range of Londoners, in particular households that include children, and BAME households who are overrepresented among homeless households in London, as are men and young people- in particular young LGBT people<sup>4</sup>.

Overall these changes may result in both indirect/direct beneficial impacts in the short term (+), medium term (+) and long term (++). The impact should be permanent and relevant at a Local level, Greater London and the wider region. Matrix to be drafted to reflect this.

#### Objective 7 Design

• Clarifying the policy requirements around how boroughs are expected to ensure that site capacity is optimised including thinking about appropriate layout will reduce the risk of overheating which can affect older and younger people in particular. The clarifications should help to avoid poor design outcomes such as habitable spaces that do not get sufficient sunlight or daylight which can affect people who may be less likely to spend time outdoors/go outdoors as regularly such as some disabled people and older people who are more likely to be disabled or have age-acquired impairments or mobility impairments. This should result in a direct beneficial impact in the short term (+), medium term (++) and long term (++). The impact should be permanent and relevant at a Local level, and Greater London. Matrix to be drafted to reflect this.

#### Objective 9 Connectivity

• Clarifying the importance of existing and planned infrastructure delivery when planning for future growth in an area is likely to have a positive impact on groups who are more reliant on using public transport to move around such as BAME people given higher usage of London's buses amongst this protected characteristic (68 per cent of BAME Londoners use the bus at least once a week compared to 57 per cent of white Londoners).

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>2</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>3</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>4</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

• Ensuring that an area's capacity for growth takes into account existing and planned transport networks in terms of connectivity and capacity will likely have a positive impact through giving people greater access to employment opportunities by making it easier and more accessible for people to move around the city. Improvements to transport connectivity can give people greater access to employment opportunities and while the relationship between transport and employment is complex, under the right conditions, investment in transport connectivity can contribute to reducing unemployment. Given that BAME Londoners have a lower employment rate (57 per cent, compared to 64 per cent) improvements to transport connectivity could contribute to improving this inequality, representing a potential positive impact for this group.

Improving connectivity to social and transport infrastructure can impact on the value of land and depending on local circumstances this could inflate the cost of accommodation in some areas, particularly impacting private renters on lower incomes such as older retired people, some disabled people, or students. However, improving connectivity could be a contributing factor in facilitating the delivery of more housing which could have a positive impact if different types of housing are provided in new developments, including more affordable housing.

Overall these changes may result in direct beneficial impacts in the short term (+), medium term (+) and long term (+). The impacts should be permanent and relevant at a Local level and for Greater London. Matrix to be drafted to reflect this.

#### D1 London's form, character and capacity for growth

IIA Element												IIA Obj	ectives	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1	1														1						
Short Term						+	+		+	+	+	n/a	+	0	n/a	0	n/a	n/a	+	+	+	+	n/a	0
Medium Term						+	+		+	+	+	n/a	+	0	n/a	+	n/a	n/a	+	+	+	+	n/a	0
Long Term						++	++		+	+	+	n/a	+	+	n/a	+	n/a	n/a	+	++	++	+	n/a	0/+
Direct / Indirect						I/D	I/D		I	ı	1	n/a	D	ı	n/a	I	n/a	n/a	D	I/D	I/D	1	n/a	I
Temporary / Permanent						Р	Р		Р	Р	Р	n/a	Р	T/P	n/a	Р	n/a	n/a	Р	Р	Р	Р	n/a	Р
Local / Greater London / Wider Region / Global						L/G L	L/G L		L/G L	L/G L	L/G L	n/a	L	L/G L	n/a	L/G L/G	n/a	n/a	L	L/G L/ W	L/G L	L/G L	n/a	L
EQIA																								
Short Term	+	+	+	n/a	+	+	+	0	+	n/a	0	n/a	0	0	n/a		n/a	n/a	n/a	0	+	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	++	+	+	n/a	+	n/a	0	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Long Term	++	++	+	n/a	++	+	++	+	+	n/a	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Direct / Indirect	1	I	I/D	n/a	I/D	I/D	D	I	D	n/a	D	n/a	I	D	n/a		n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a
Temporary / Permanent	Р	Р	Р	n/a	Р	Р	Р	Р	Р	n/a	Р	n/a	Р	Р	n/a		n/a	n/a	n/a	Р	Р	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	L/G L/ W	L/G L	L/G L	L/G L	L/G L	n/a	L/G L	n/a	L	L/G L	n/a		n/a	n/a	n/a	L	L	n/a	n/a	n/a
HIA			•	•	•							•		•						•				
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		I/D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		Р				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/G L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
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Short Term				n/a					+															
Medium Term				n/a					+															
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Direct / Indirect				n/a					ı															
Temporary / Permanent				n/a					Р															
Local / Greater London / Wider Region / Global				n/a					L/G L/ W															

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#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 7. 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10.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
- 11.To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12.To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13.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.
- 14.To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15.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.
- 16.To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17.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
- 18.To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19.To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20.To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21.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.
- 22.To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24.To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 3 Design	<b>Policy:</b> D1A Infrastructure requirements for sustainable
	densities (Policy D2). New matrix required.

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### Overview of proposed changes (Policies D1, D2 and D6):

Structural changes to Policies D1, D2 and D6 have been made to provide a stronger narrative and clarity as to how to be implemented. There are now 4 distinct policies (Policies D1, D1A, D1B and D2).

The new **Policy D1A, Infrastructure requirements for sustainable densities**, incorporates the elements of the original Policy D6 parts B1-B3A relating to the assessment of existing and planned infrastructure capacity.

#### Main changes made within Policy D1A Infrastructure requirements for sustainable densities

- The policy is more explicit that the density of development proposals should respond to, and be linked to, future infrastructure capacity and that it should be proportionate to a site's accessibility and connectivity.
- The policy is now clear that infrastructure capacity ultimately will limit the scale of development where it cannot be enhanced to mitigate the impact of a development.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• The changes strengthen the integration of land use and transport when planning for future development as the changes clarify that infrastructure capacity ultimately will limit the scale of development where it cannot be enhanced to mitigate the impact of a development meaning that the built form and/or density of a development cannot exceed a sustainable level, even if it is acceptable in design terms. This will contribute to helping to make the best use of land by ensuring that it is appropriate development that comes forward. This is likely to have an indirect beneficial impact in the short term (+), and direct beneficial impact in the medium term (+) and long term (++). The impact should be permanent and relevant at a Local level, for Greater London, and for the Wider Region. Matrix to be drafted to reflect this.

#### Objective 9 Connectivity

• The policy is more explicit that the density of development proposals should respond to, and be linked to, future infrastructure capacity and that it should be proportionate to a site's accessibility and connectivity. Ensuring that development is supported by transport infrastructure is likely to encourage a modal shift to more sustainable forms of travel, thereby helping to reduce traffic volumes and congestion on roads across all parts of London. This is likely to have a direct beneficial impact in the short term (+), medium term (+) and long term (++). The impact should be permanent and relevant at a Local level, and for Greater London. Matrix to be drafted to reflect this.

#### Objective 11 Infrastructure

• More explicitly linking density and infrastructure capacity is likely to positively contribute to supporting economic competitiveness and housing delivery. This is likely to have a direct beneficial impact in the short term (+), medium term (++) and long term (++). The impact should be permanent and relevant at a Local level, for Greater London, and for the Wider region. Matrix to be drafted to reflect this.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 9 Connectivity

• Making it clear that development needs to be supported by adequate transport infrastructure and that this needs to be accessible to people is likely to improve connectivity and increase the proportion of journeys made by sustainable and active modes. This is likely to have a direct beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, and for Greater London. Matrix to be drafted to reflect this.

#### Objective 14 Air Quality

• Ensuring that sufficient infrastructure is in place, particularly public transport infrastructure, is likely to positively contribute to improved air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals, thereby reducing the number of people exposed to exposed to particulates and NO<sub>2</sub> concentrations. This is likely to have an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, for Greater London, and for the Wider region. Matrix to be drafted to reflect this.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

#### Objective 9 Connectivity

• Working alongside the other design policies, these changes - by creating safe, attractive routes between places and transport nodes are likely to have an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, for Greater London, and for the Wider region. Matrix to be drafted to reflect this.

#### 5. EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics?** Yes, for: disability, age, sex, race, religion, sexual orientation, pregnancy & maternity.

#### b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 4 Crime, Safety and Security

• By requiring that new development responds to and integrates with existing transport infrastructure or considers how it will integrate with future infrastructure, the changes will help to create a travel environment that feels safe to all users during the day time and night time because thought has been given to how to move people between their chosen mode of transport and buildings/spaces. This is likely to be beneficial for all groups who are more likely to be victims of crime including; BAME Londoners, and certain younger age groups¹. This is likely to have a direct beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, and for Greater London. Matrix to be drafted to reflect this.

#### Objective 8 Accessibility

• Ensuring that the scale of development relates to existing or future infrastructure capacity will help to mitigate the impacts of a growing population on the public transport network. Managing future levels of crowding by improving transport capacity and connectivity should have a beneficial impact on those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys more comfortable. Evidence<sup>2</sup> also states that older and disabled Londoners, and parents of young children, face barriers to accessing public transport in London including overcrowding. This is likely to have an indirect/direct beneficial impact in the short term (+), medium

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>2</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

term (+) and long term (+). The impact should be permanent and relevant at a Local level, and for Greater London. Matrix to be drafted to reflect this.

# Objective 11 Infrastructure

- Clarifying the requirements around the integration of development with supporting infrastructure is likely to lead to an improvement in the capacity and connectivity of the public transport and active travel network and help to ensure that social infrastructure is more easily accessible by walking, cycling and public transport. This should have a beneficial impact for specific faith groups by making it more convenient to travel to places of worship by active travel modes or public transport, as well as the following groups' evidenced<sup>3</sup> transport behaviour:
  - Older and disabled Londoners are less likely to walk than average
  - BAME, younger, older Londoners and women are more likely to use London buses
  - Cycling is less common among women, older and BAME Londoners.

This is likely to have an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level. Matrix to be drafted to reflect this.

<sup>&</sup>lt;sup>3</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

#### D1A Infrastructure requirements for sustainable densities

IIA Element		1									_		ectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1	1																	1	1	_
Short Term						+	n/a		+	+	+	n/a	n/a	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/
Medium Term						+	n/a		+	+	++	n/a	n/a	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/
Long Term						++	n/a		++	+	++	n/a	n/a	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/
Direct / Indirect						ı	n/a		D	ı	D	n/a	n/a	n/a	ı	n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/
Temporary / Permanent						Р	n/a		Р	Р	Р	n/a	n/a	n/a	Р	n/a	Р	n/a	Р	n/a	n/a	n/a	n/a	n/
Local / Greater London / Wider Region / Global						L/G L/ W	n/a		L/G L	L/G L	L/G L/ W	n/a	n/a	n/a	L	n/a	L	n/a	L/G L	n/a	n/a	n/a	n/a	n/
EQIA							1																	H
Short Term	+	+	+	+	n/a	0/+	0	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	+	+	+	+	n/a	0/+	0	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	+	+	+	+	n/a	0/+	+	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	I/D	1	I/D	D	n/a	ı	D	I/D	I/D	i/D	ı	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	1/1
Temporary / Permanent	Р	Р	Р	Р	n/a	Р	Р	Р	Р	Р	Р	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L/G L	n/a	L/G L/ W	L	L/G L	L/G L	L/G L	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA										<u> </u>	<u> </u>							<u> </u>				<u> </u>		
Short Term	0/+	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		?
Medium Term	0/+	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		?
Long Term	0/+	n/a	+		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		?
Direct / Indirect	ı	n/a	I/D		n/a				D	n/a				ı	n/a		n/a	n/a		n/a	n/a	n/a		1/1
Temporary / Permanent	Р	n/a	Р		n/a				Р	n/a				Р	n/a		n/a	n/a		n/a	n/a	n/a		Р
Local / Greater London / Wider Region / Global	L/G L	n/a	L		n/a				L/G L	n/a				L/G L/ W	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA										l .								l				<u> </u>		
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I															
Temporary / Permanent				n/a					Р															
Local / Greater London / Wider Region / Global				n/a					L/G L/ W															

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#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 3 Design	<b>Policy:</b> D1B Optimising site capacity through the
	design-led approach (Policy D3). New matrix required.

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### Overview of proposed changes (Policies D1, D2 and D6):

Structural changes to Policies D1, D2 and D6 have been made to provide a stronger narrative and clarity as to how to be implemented. There are now 4 distinct policies (Policies D1, D1A, D1B and D2).

#### Main changes made within Policy D1B Optimising site capacity through the design-led approach

- The policy provides a clearer and concise definition of the design-led approach. It also clarifies that the design-led approach requires consideration of different design options to determine the most appropriate form of development.
- The requirement for higher density developments to provide a management plan has been removed. However, revised Policy D2 does require higher density development to consider the ongoing management and maintenance of buildings.
- Removal of reference to the upper limit of the density matrix.
- The supporting text includes more explicit links to D3.

#### Panel recommendation change

Removal of Part D which prescribed that applications that unjustifiably fail to optimise capacity should be refused, as this can be assessed on an individual basis using the other requirements of the policy. Non-material change.

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

- Inclusion of the requirement to consider different design options to determine the most appropriate form of development will help to ensure that development comes forward that makes the best use of land
- The panel recommendation to clarify that applications that unjustifiably fail to optimise capacity should be assessed on a site by site basis rather than prescribing that they should be refused in the first instance will likely help to make the best use of land through appropriate development as it will encourage a site by site assessment approach that considers a development on its individual merits.

Overall these changes are likely to result in an indirect/direct and permanent positive short term (+), medium term (+) and long term (++) impact at the local level, for Greater London and the wider region. Matrix to be drafted to reflect this.

#### Objective 7 Design

- A design-led approach is likely to help to streamline the planning process as both applicants and decision makers will have a clear idea of what a site's capacity for growth is and what appropriate development is likely to consist of prior to a proposal coming forward.
- More explicit reference to D3 will help to create inclusive developments by encouraging an inclusive
  design approach that takes into account the needs of a variety of users. Ensuring that the needs of a
  variety of users are taken into account as part of the design process is likely to result in
  developments being suitable for a more diverse range of users/occupiers which will in turn help to
  create a sense of place and 'vibrancy' around new developments.

 The inclusion of the requirement for a Circular Economy Statement to accompany referable applications or where a lower threshold has been established will lead to the promotion of sustainable design and construction methods.

Overall, these changes are likely to result in an indirect/direct and permanent positive short term (+), medium term (++) and long term (++) impact at the local level, for Greater London and the wider region. Matrix to be drafted to reflect this.

#### Objective 9 Connectivity

• The more explicit link between density and supporting infrastructure is likely to positively contribute to improved connectivity to, from, within and around London and facilitate an increase in the proportion of journeys made by sustainable and active transport modes. This is likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, and for Greater London. Matrix to be drafted to reflect this.

#### Objective 11 Infrastructure

• The more explicit link between capacity for growth being determined by existing and future infrastructure capacity is likely to positively contribute to this objective and help to unlock land that has capacity for housing development. This is likely to result in an indirect and permanent impact in the short term (+), medium term (+) and long term (+) at the local level, and for Greater London. Matrix to be drafted to reflect this.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 1 Equality and inclusion

- Including a new consideration in the supporting text for new developments to create inclusive places that meet the needs of all potential users is likely to help to reduce inequalities and barriers, by ensuring that development has been designed with an inclusive design approach that takes into account the needs of a variety of users, creating healthy inclusive places and spaces.
- Requiring that the site allocation process should include meaningful engagement and collaboration
  with stakeholders will help applicants and decision makers to understand and identify what the
  diverse needs of the local population are and so be able to respond to these needs through the
  design of development.

Overall, these changes are likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the local level and for Greater London. Matrix to be drafted to reflect this.

#### Objective 3 Health and Health Inequalities

• Ensuring that existing or planned future infrastructure has the ability and capacity to support new development will help to ensure that access to health and social care services for residents/users of an area will be maintained or improved and not reduced through the construction and occupation of new development. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix to be drafted to reflect this.

#### Objective 5 Housing Supply, Quality, Choice and Affordability

- A consultative design-led approach to working out optimal development capacity will likely result in new development being able to provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand of a local area, as the design of the development will be underpinned by an understanding of community needs and any housing-related stresses such as homelessness or overcrowding.
- The inclusion of the requirement for a Circular Economy Statement to accompany referable applications or where a lower threshold has been established will likely result in developments that include more sustainable design and construction methods which may have the positive impact of improving insulation and energy efficiency in housing and so reducing fuel poverty and ill-health.

Overall, these changes are likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix to be drafted to reflect this.

# 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 Connectivity

- Working out the optimal site capacity at the plan-making stage will ensure that development will be supported by existing infrastructure networks, or that future infrastructure is able to be delivered to meet the future development demand. This will ensure that future development will contribute to the enhancement and improvement of connectivity to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes.
- Using the design-led approach will mean that the design of places will be able to integrate measures that encourage active travel by creating safe, attractive routes based on an understanding of the local character and context developed as part of the area assessment.

Overall, these changes are likely to result in an indirect/direct and permanent positive short term (+), medium term (+) and long term (++) impact at the local level, for Greater London and the wider region. Matrix to be drafted to reflect this.

# 5. EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics?** Yes, for: disability, age, sex, race, religion, sexual orientation, pregnancy & maternity.

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• Including a new consideration in the supporting text for new developments to create inclusive places that meet the needs of all potential uses will contribute to the promotion of an inclusive design approach. This will help to remove the physical barriers to inclusion and participation that many older and disabled people experience, resulting in positive impacts for many older and disabled people. This is likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the Local level and for Greater London. Matrix to be drafted to reflect this.

#### Objective 2 Social integration

• A consultative design-led approach to working out optimal development capacity will help boroughs to identify and understand the how places and buildings in an area are valued by and can work with certain groups of Londoners to increase opportunities for social integration, potentially working to combat social isolation. This could represent positive impacts in particular for those groups for whom evidence<sup>1</sup> suggests social isolation is more prevalent i.e. men, disabled people, BAME Londoners and people aged 20-24 years. This is likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix to be drafted to reflect this.

#### Objective 3 Health and Health Inequalities

• Strengthening the link between the optimisation of site capacity and inclusive design by requiring that new developments create inclusive places that meet the needs of all potential users is likely to help to reduce inequalities in physical and mental health and wellbeing as the policy will help to bring forward safe, welcoming, secure and inclusive places and spaces. This is likely to have a positive impact for groups who may be more likely to experience barriers to access or inclusion-including disabled and older people, as well as groups at greater risk of poor mental health which includes young women, people aged 35-44 and disabled adults<sup>2</sup>. This is likely to result in a direct and

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>2</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

permanent positive short term (+), medium term (+) and long term (+) impact at the local level, and for Greater London. Matrix to be drafted to reflect this.

Objective 5 Housing Supply, Quality, Choice and Affordability

• Strengthening the design scrutiny requirements for new development by clarifying that the design-led approach requires consideration of different design options to determine the most appropriate form of development will help to facilitate the delivery of house building that meets the needs of Londoners. Considering different design outcomes provides applicants and decision makers with an evidence base on which to assess the potential impacts of design features that would be provided through differing scheme options. For example, design features provided by accessible housing policy requirements are likely to positively impact on older and disabled people; resulting in increased housing choice for them. Many accessible housing features also benefit families with young children and an increase in relevant housing choice in an area could have a positive impact for this group, allowing them to potentially find a home which meets their (possibly changing) requirements while remaining in their current community, thereby maintaining existing support and social networks.

These changes are likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, for Greater London, and potentially the wider region. Matrix to be drafted to reflect this.

#### Objective 7 Design

- Increasing the clarity of the policy in reference to the design-led approach will help to streamline the planning process and help to avoid poor design outcomes such as insufficient sunlight or daylight which may be particularly beneficial to many blind and partially sighted people and older people with certain age related eye conditions for whom natural light levels within the home can be of particular importance. The requirement to consider different design options to determine the most appropriate form of development is likely to result in more developments coming forward that achieve the highest standards of accessible and inclusive design which is likely to have a positive impact for groups including older people and disabled people who are more likely to experience barriers to inclusion.
- Including a new consideration in the supporting text for new developments to create inclusive places to link with policy D3 Inclusive design will contribute to users experiencing a safe and secure environment they feel comfortable in. This is likely to be beneficial for all groups who are more likely to be victims of crime including; BAME Londoners, men, and certain younger age groups<sup>3</sup>.

Overall, these changes are likely to result in an indirect and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, for Greater London and the wider region. Matrix to be drafted to reflect this.

#### Objective 9 Connectivity

- Working out the optimal site capacity at the plan-making stage will ensure that development can be supported by existing infrastructure networks, or that future infrastructure is able to be delivered to meet the future development demand and will not fall short in terms of delivery time or capacity. This is likely to have the positive impact of reducing or mitigating crowding on public transport services as London grows. These measures should therefore contribute to ensuring public transport is a more attractive option and choice representing a positive impact in particular for:
  - BAME, younger, older Londoners and women who are more likely to use London's buses, and-older, younger and disabled Londoners who are less likely to use the tube.  $^4$
- Managing future levels of crowding by improving transport capacity and connectivity should have a beneficial impact on those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys more comfortable.

<sup>&</sup>lt;sup>3</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

<sup>&</sup>lt;sup>4</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

Overall, these changes are likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, for Greater London and potentially the wider region. Matrix to be drafted to reflect this.

#### D1B Optimising site capacity through the design-led approach

IIA Element												IIA Obj	ectives	S										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	n/a	+	n/a	n/a	0	+	+	0	+	+	+	0	n/a	0	+
Medium Term						+	++		+	n/a	+	n/a	n/a	0	+	+	0	+	+	+	0	n/a	+	+
Long Term						++	++		+	n/a	+	n/a	n/a	?/+	+	+	0/+	+	+	+	?/+	n/a	+	+
Direct / Indirect						I/D	I/D		ı	n/a	ı	n/a	n/a	ı	I/D	I/D	I/D	ı	I/D	I/D	ı	n/a	I/D	I/D
Temporary / Permanent						Р	Р		Р	n/a	Р	n/a	n/a	Т	Р	Р	Р	Р	Р	Р	Р	n/a	Р	Р
Local / Greater London / Wider Region / Global						L/G L/ W	L/G L/ W		L/G L	n/a	L/G L	n/a	n/a	L/G L	L/G L	L/G L	L	L/G L	L/G L	L/G L	L	n/a	L/G L	L/G L
EQIA										<u> </u>	<u> </u>				l									
Short Term	+	+	+	0	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	0	n/a
Medium Term	+	+	+	0	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Long Term	+	+	+	?/+	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	0/+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Direct / Indirect	ı	ı	D	I/D	D	n/a	ı	n/a	D	n/a	n/a	n/a	n/a	ı	n/a		n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a
Temporary / Permanent	Р	Р	Р	T/P	Р	n/a	Р	n/a	Р	n/a	n/a	n/a	n/a	Т	n/a		n/a	n/a	n/a	n/a	n/a	n/a	Р	n/a
Local / Greater London / Wider Region / Global	L/G L	L	L/G L	L	L/G L/ W	n/a	L/G L/ W	n/a	L/G L/ W	n/a	n/a	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/G L	n/a
HIA																								
Short Term	+	n/a	+		+				n/a	n/a				0	n/a		n/a	n/a		0	n/a	n/a		0
Medium Term	+	n/a	+		+				n/a	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Long Term	+	n/a	+		+				n/a	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	ı	n/a	D		ı				n/a	n/a				D	n/a		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	Р	n/a	Р		Р				n/a	n/a				T/P	n/a		n/a	n/a		Р	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/G L	n/a	L		L				n/a	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
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#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 3 Design	<b>Policy:</b> D2 Delivering good design (Policy D4)

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### Overview of proposed changes (Policies D1, D2 and D6):

Structural changes to Policies D1, D2 and D6 have been made to provide a stronger narrative and clarity as to how to be implemented. There are now 4 distinct policies (Policies D1, D1A, D1B and D2).

Amended **Policy D2**, **Delivering good design**, does not have any substantive new elements. It is essentially what remains after sections (D2 parts A and B) of it have been relocated to Policy D1. The new policy has a far clearer purpose and it relates specifically to the process of ensuring good design by providing certainty to developers (in terms of application requirements to demonstrate good design), sets out how the quality of design should be scrutinised, and how to maintain high quality design post- planning approval.

In Policy D2 part D1, new text has been added to simplify the application of this part of the policy to any development that exceeds 350 units per hectare.

The original Policy D6 part C used the upper end of the 'density matrix'. It is considered this is undesirable as it is helpful to leave the matrix in the past in its entirety, rather than for the new plan to retain vestiges of the matrix. Furthermore, the former approach related the density of a scheme to its PTAL. From a design point of view, the PTAL is not relevant. As such the new definition, or trigger, for requiring consideration of ongoing management and maintenance of higher density schemes is those that comprise 350 units per hectare or more. This comes from the 'Super-density: The Sequel' (produce by architects HTA, Pollard Thomas Edwards, Levitt Bernstein and PRP http://www.superdensity.co.uk/) which defines schemes greater than 350 units per hectare as 'hyper-density', and thus is considered a logical and clear point to require more detailed design scrutiny. It also is within the density range of 110-405 units/ha contained within D6 part C.

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land use

• The amendment to the policy and restructuring of the policy paragraphs clarify its purpose which is to facilitate the process of ensuring good design by providing certainty to developers, setting out how design quality should be scrutinised and how design quality can be maintained throughout the planning process. Providing as clear a steer as possible to stakeholders about how they can help to bring forward good design will likely help to ensure that the best use of land is made in the future, through appropriate development on brownfield sites. This is already reflected in the matrix as being likely to result in an indirect and permanent positive impact for the short term (+), medium term (+) and long term (+) at the local level.

#### Objective 7 Design

- Ensuring that the policy links to current external guidance, and that it is as focused as possible in its message through consolidating parts of a number of policies will likely contribute to the promotion of sustainable future growth in which good design plays a key role.
- The addition of details relating to how to maintain high-quality design post-planning approval across different type of applications (e.g. outline applications) and how design codes and requirements for submission of specific design information with applications can support design quality will help to improve the wider built environment by promoting high quality design and sustainable design and construction methods at a strategic level across Greater London.

- Removing references to the old density matrix including the approach of relating the density of a scheme to its PTAL will help to ensure that future development is appropriate for its context as from a design point of view, the PTAL is not relevant. The new definition will ensure that higher density buildings will require more detailed design scrutiny which will contribute to the promotion of high-quality design that responds to and enhances the character of the area.
- Although the intent of the paragraph at 3.2.8 (originally D6C and 3.6.7 combined) has not changed, moving text from policy to supporting text status could potentially weaken the point being made which is that it is important to scrutinise the qualitative aspects of the design of proposed residential development. However, this paragraph now supports a policy which is more focused on the importance of thorough scrutiny of the design of development proposals during the planning process rather than being a supporting element to a policy addressing density. Appropriate design scrutiny will help to ensure that new buildings and spaces are appropriately designed in a way which promotes and enhances the existing character and creates/maintains safe and attractive public realm, and which improves the wider built environment by bringing forward development that takes into account the needs of a variety of users.

Overall this is already reflected in the matrix as being likely to result in a direct and permanent positive impact for the short term (+), medium term (+) and long term (++) at the local level.

# 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 5 Housing Supply, Quality, Choice and Affordability

• Design is a key component of ensuring that development is sustainable. Re-structuring the policy to clarify the objective of ensuring good design through development and providing guidance on how to go about achieving this for different stakeholders will help to ensure that future housing will be of a quantum, type, quality and tenure that meets demographic and household demand. This is already reflected in the matrix as being likely to result in a direct and permanent positive impact for the short term (+), medium term (+) and long term (+) at the local level.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4 Crime, safety and security

• Clarifying the application requirements to demonstrate good design, and setting out addition detail around how the quality of design should be scrutinised and how to maintain high quality design post-planning approval will likely ensure that the potential safety and security impacts related to design choices are considered early in the design process and those important to good design outcomes are protected/retained throughout the development process as part of the maintenance of high quality design post-planning approval. This is already reflected in the matrix as being likely to result in an indirect or direct permanent positive impact for the short term (0), medium term (+) and long term (+) at the local level and for Greater London.

#### 5. EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics?** Yes, including for: disability, age, sex, religion, race.

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• The new policy has a far clearer purpose and it relates specifically to the process of ensuring good design by providing certainty to developers (in terms of application requirements to demonstrate good design), sets out how the quality of design should be scrutinised, and how to maintain high quality design post-planning approval. These changes will ensure that the design process and

decisions made about changes to a development post-planning approval will not undermine an inclusive design approach or inadvertently create barriers for people, which will be of particular benefit to disabled people and many older people. Already reflected in the matrix as being likely to result in an indirect temporary or permanent positive impact for the short term (+), medium term (+) and long term (+) at the local level and for Greater London.

#### Objective 5 Housing Supply, Quality, Choice and Affordability

• Ensuring that the policy is focused and clear about the objective of ensuring good design through planning and development process and providing guidance on how to achieve this for different stakeholders in the planning process (e.g. boroughs, developers, the community etc) will help to facilitate the delivery of house building that meets the needs of Londoners. This is also likely to encourage applicants and decision makers to think up-front about how buildings can be designed to be more: affordable for those who may be more at risk of being priced out of the housing/rental market such as older retired people; accessible and adaptable so improving choice for people who require accessible housing, including many older and disabled people. It will also enhance the amenity value of the neighbourhood by creating places that people want to live and spend time in. This is likely to result in a positive impact, in particular for men, disabled people and some BAME Londoners (Pakistani/Bangladeshi, Black Caribbean or African and people of a mixed ethnicity) – all of whom are more at risk of social isolation¹. This is likely to result in an indirect permanent positive impact for the short term (+), medium term (+) and long term (+) at the local level, and for Greater London. However, overall, other elements of the policy ensure that the current scoring is not affected.

# Objective 7 Design

• Clarifying how to bring forward good design through the planning process and how to make sure that design quality doesn't get eroded through minor changes post approval will help to facilitate the delivery of development that responds to the established character and elements of the area which are valued by the community. Development which promotes and enhances local distinctiveness and sense of place could help to make people feel positive about the area that they live in and promote social integration. This is likely to result in a positive impact, in particular for men, disabled people and some BAME Londoners (Pakistani/Bangladeshi, Black Caribbean or African and people of a mixed ethnicity) – all of whom are more at risk of social isolation<sup>2</sup>. Already reflected in the matrix as being likely to result in an indirect and or direct permanent positive impact for the short term (+), medium term (+) and long term (++) at the local level, and for Greater London.

#### Objective 9 Connectivity

• Ensuring that ad-hoc decisions taken on-site during construction of a development do not undermine an inclusive design approach or inadvertently create barriers for those groups who are more affected by severance such as people on low incomes, disabled people, children and young people, older people and people who are more reliant on walking and using public transport for travel either at all times or at certain times e.g. people who practice Orthodox Judaism are not able to drive during the sabbath. Already reflected in the matrix as being likely to result in an indirect and or direct permanent positive impact for the short term (0), medium term (+) and long term (+) at the local level, and for Greater London.

<sup>&</sup>lt;sup>1</sup> Mayor's Equality and Diversity Strategy 2018

<sup>&</sup>lt;sup>2</sup> Mayor's Equality and Diversity Strategy 2018

#### 1. Initial assessment:

#### a. brief summary of extent of changes

- New policy requirement for boroughs in preparing their development plans to collaborate with local communities and ensure they support the creation of inclusive neighbourhoods
- Broadening out of policy to more explicitly include the wider built environment
- Broadening out of policy to include consideration of the requirements of a broader range of people/ more groups of people who could face barriers to inclusion in the built environment
- Clarification in supporting text that inclusive design is a fundamental part of design that must be considered at the earliest stage of the development process.
- More explicit reference to social integration in the creation of an inclusive environment
- Greater clarity in supporting text; requirements for an inclusive design statement around assessing potential impacts on the Protected Characteristics no material change
- Deletions in 3.3.1AB:
  - historic context in list as this is covered in para 3.3.6 no material change
  - link to legal requirements unnecessary, no material change
- Deletion of MSC in 3.3.1AC around the planning of inclusive design elements of a development proposal and evaluation of inclusive design statements
- Further clarity that the inclusive design statement should be proportionate to the scale and type of developments no material change
- Further detail on what an inclusive environment/ neighbourhood is taken from the glossary

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 7 Design

• The broadening out of the policy to the wider built environment and further detail on what an inclusive environment is, particularly in relation to enabling people to easily and safely move around the city by active travel modes, is likely to positively contribute to the design objective by encouraging people to walk and cycle via the creation of safe and attractive streets and areas of public realm. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

#### Objective 9 Connectivity

• Further detail on what an inclusive environment is, particularly in relation to enabling people to easily move around by active travel modes, will help to encourage a modal shift to more sustainable forms of travel thereby improving the connectivity of the city. This is likely to have positive impacts in the short, medium and longer term. Matrix updated.

#### Objective 14 Air Quality

• Further detail on what an inclusive environment is, particularly in relation to enabling people to move around by active travel modes, is likely to positively contribute to improving air quality by reducing the amount of people using private modes of transport thereby contributing to reduced NOx, PM10 and PM2.5 emissions. This is likely to have positive impacts in the short, medium and longer term. Matrix updated.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 3 Health and Health Inequalities

• The broadening out of the policy and further detail on what an inclusive environment is, particularly in relation to ensuring that people are able to easily access services, facilities and amenities that are relevant to them, is likely to contribute to improved equity of access to health and social care services and facilities thereby contributing to improved physical and mental health and wellbeing of communities. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

# 4. CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 – Connectivity

• Direct reference to a development's contribution toward the creation of an inclusive neighbourhood and greater detail of what an inclusive neighbourhood is will indirectly help to encourage more active travel by potentially creating safer, more attractive routes. This is likely to have positive impacts in the short, medium and longer term. Matrix updated.

#### 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 – Equality and Inclusion

- The broadening out of the policy, more explicit reference to ensuring inclusive design is considered at the earliest stages of the process, and further detail on what an inclusive environment is are all likely to positively contribute to equality and inclusion by helping to eliminate discrimination and advance equality of opportunity. This is likely to benefit people or groups of people who would come under a protected characteristic (with the exception of marriage and civil partnership), as the amendments are directly aimed at ensuring impacts which may affect many of these groups are explicated considered. This is likely to have positive impacts in the short term, becoming stronger in the medium and longer term. These impacts are already reflected in the Matrix.
- The importance of the Policy covering all groups, particularly given the Policy is titled "inclusive design", was raised by a number of participants at the EiP and formed a detailed part of the discussion and the FSC reflect this discussion. The MSC version of the Policy primarily focused on access and inclusion for people who face barriers to accessing the built environment mainly disabled and older people. While a broader policy could be argued to dilute the focus on these specific groups, a key element of inclusive design is that when designing and delivering places and spaces, the needs of all groups should be considered. Moreover, this should be embedded as a key principle for all of those involved in the design of places, rather than it being considered a discrete element of a scheme or considered in isolation.
- Further detail as to what an inclusive environment is, is also likely to contribute to promoting an
  inclusive design approach which ensures places are designed to take account of London's diverse
  population, delivering people-focused spaces that are designed to facilitate interaction and inclusion
  as well as the prevention or removal of barriers for people or groups who could come under one of
  the protected characteristics. This is particularly likely to benefit disabled and older people, and
  those with very young children in terms of potential physical barriers within the built environment.
  This is likely to have positive impacts in the short, medium and longer term. These impacts are
  already reflected in the Matrix.

#### Objective 2 Social Integration

• The provision of high quality, people-focused spaces that are designed to facilitate social interaction and inclusion and further detail as to what an inclusive environment is, is likely to positively contribute to social integration by providing a barrier-free environment which provides opportunities for Londoners of different backgrounds to connect. This is likely to result in a positive impact, in particular for men, disabled people and some BAME Londoners (Pakistani/Bangladeshi, Black Caribbean or African and people of a mixed ethnicity) – all of whom are more at risk of social isolation. People who would come under the protected characteristic of gender reassignment may also benefit from the provision of people-focussed spaces and further detail on what an inclusive environment is, as research indicates many feel they are prevented from fully participating in their communities as a result of fear of abuse<sup>2</sup>. Public spaces that feel safer are therefore likely to impact positively on people who come under this protected characteristic. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

#### Objective 4 Crime, safety and security

• The broadening out of the policy to cover the whole of the built environment and further detail of what constitutes an inclusive environment may help to create an environment that feels safe for all users during the day time and night time. This is likely to positively impact on many groups of people who would come under a protected characteristic, for example; crime is often cited as a major concern for older people<sup>3</sup>, and despite the decrease in the incidence of crime overall, in most cases experience of crime remained higher for disabled people compared with non-disabled people, and more specifically experience of any crime was higher for disabled people with certain impairments<sup>4</sup>. People coming under the protected characteristic of gender reassignment are also more likely to be victims of crime than some other members of the population<sup>5</sup>. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

#### Objective 6 Sustainable Land Use

• The inclusion of clauses AA, and A1A will all help to ensure that the potential impacts of development on people and groups who come under a certain protected characteristic are considered. This is likely to provide a positive impact for all protected characteristics in the short, medium and longer term, in terms of making the best and most efficient use of land, particularly in regards to ensuring that higher densities development does not adversely impact on different groups of people. This is likely to have positive impacts in the short, medium and longer term. Matrix updated.

# Objective 7 Design

- The broadening out of the policy to cover the whole of the built environment and ensuring that inclusive design is considered at the earliest stages of the process, both contribute to helping make people feel positive about the area they live in and helping promote social integration. This is likely to represent positive impacts in particular for men, disabled people, people aged 20-34 and some BAME Londoners all of whom are more likely to feel a low sense of belonging to where they live<sup>6</sup>. This is likely to have positive impacts in the short and medium term with stronger positive impacts in the longer term. These impacts are already reflected in the Matrix.
- The broadening out of the policy to cover the whole of the built environment and further detail on what an inclusive environment is, is also likely to contribute to improved legibility and ease of use of the built environment for people with sensory or cognitive impairments. This is particularly likely to

<sup>&</sup>lt;sup>1</sup> Mayor's Equality and Diversity Strategy 2018

A Vision for Change – Acceptance Without Exception for Trans People, Stonewall, 2017

<sup>3</sup> King's College London (2015) An Age Friendly City - how far has London come?

<sup>&</sup>lt;sup>4</sup> EHRC (2016 update) Crime and disabled people: Measures of disability-related harassment

<sup>&</sup>lt;sup>5</sup> See assessment of the GLA impact on trans-equality

benefit many disabled people<sup>7</sup> and older people who may experience poorer health<sup>8</sup> or who are more likely to be living with certain conditions such as dementia. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

- Para 3.3.1AC was amended as part of the broader changes to this Policy, this is firstly because the amendments to the Policy and supporting text are clear that inclusive design is indivisible from good design and is key to the functioning of successful places. It should not be seen as an 'element' of a scheme, rather integral and embedded into all of the scheme. Moreover, all built environment professionals must take account of and implement the requirements of this Policy, and all elements of a planning application should be drafted by a suitably qualified professional -not simply the inclusive design statement therefore the references to particular specialists would not support the broader approach to inclusive design, and the mainstreaming of this essential component or the team-wide buy-in which is required to ensure successful inclusive schemes.
- In addition to this, given the broadening of the policy to ensure it covers the whole of the built environment, the specific reference to suitably qualified specialists being members of the National Register of Access Consultants - previously proposed as a minor suggested change, has been removed. This was in recognition of the fact that Access Consultants specialise in access and inclusion to the built environment primarily for disabled people and people who face barriers to accessing the built environment, for example, older people with age acquired impairments or those with very young children using a push chair. It was felt this was too focussed given the broader remit of this policy, and as a result of this focus, wider inclusion issues could be overlooked or missed. The IIA addendum showed the MSC to have a positive impact. The removal of this text could mean specific specialist expertise in the field of access and inclusion for disabled and older people not being engaged in the process - which could result in less successful schemes for these groups. However, the stronger focus on inclusive design more generally as an intrinsic part of the planning and development process, the requirements of the Policy and paragraph 3.1AB should ensure that the needs of all relevant groups are considered and assessed as part of the planning process. Moreover, it seeks to ensure wider buy in within development teams and that inclusive design is a key consideration for all actors involved in development in London; in particular planners, urban designers and architects as well as other specialists involved in development. The policy therefore provides a strong narrative to ensure inclusive environments will be delivered across London.
- Overall taking all of this into account, the Policy is considered to have a positive impact for the objective of design. No change to the Matrix.

## Objective 8 Accessibility

Greater emphasis on the inclusive neighbourhood approach will result in improved links between
areas, neighbourhoods and communities - representing positive impacts for groups who face
particular barriers to access and inclusion, for example disabled people and older people. These
impacts are already reflected in the Matrix.

# Objective 9 – Connectivity

• Further detail on what an inclusive environment is, particularly in relation to ensuring that people are able to easily access services, facilities and amenities that are relevant to them and are able to easily move around the city by active modes is likely to positively impact connectivity in terms of improved access to services, jobs and leisure and amenities. This may be particularly beneficial for older people, the very young and disabled people who may face barriers to travelling longer distances to access services. A focus on more active modes is particularly likely to benefit many people who would come under these groups. This is likely to have positively impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

Objective 14 – Air Quality

<sup>&</sup>lt;sup>7</sup> Matthews et al (2015) The impact of street accessibility on travel and independence for disabled people

<sup>&</sup>lt;sup>8</sup> King's College London (2015) An Age Friendly City – how far has London come?

• Further detail on what an inclusive environment is, particularly in relation to supporting and encouraging people to move around by active travel modes, is likely to improve air quality more generally, which is likely to contribute to helping to reduce inequalities for those who live in deprived areas or are more vulnerable to the effects of poorer air quality such as older people<sup>9</sup>, disabled people and BAME groups<sup>10</sup>. This is likely to have positively impacts in the short, medium and longer term. Matrix updated

#### Objective 20 Natural Capital

• Further detail on what an inclusive environment is, particularly in relation to creating barrier-free access, is likely to positively contribute towards promoting more sensory environments. This is likely to particularly benefit disabled children in relation to play spaces and facilities and some disabled and older people in terms of navigation aids in the wider built environment such as logical and intuitive street layouts, seating and design features, including suitable crossing points and associated tactile paving. This is likely to have positively impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

<sup>&</sup>lt;sup>9</sup> Updated Analysis of Air Pollution in London, Aether, February 2017

<sup>&</sup>lt;sup>10</sup> Updated Analysis of Air Pollution in London, Aether, February 2017

#### D3 Inclusive design

DIIA Element											ı	IA Obj	ective	!S										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	,								_						_									
Short Term						n/a	+		+	n/a	n/a	n/a	+	+	n/a	0	n/a	n/a						
Medium Term						n/a	+		+	n/a	n/a	n/a	+	+	n/a	0	n/a	n/a						
Long Term						n/a	+		+	n/a	n/a	n/a	+	+	n/a	0	n/a	n/a						
Direct / Indirect						n/a	ı		I	n/a	n/a	n/a	1	T	n/a	ı	n/a	n/a						
Temporary / Permanent						n/a	Р		T/P	n/a	n/a	n/a	T/P	T/P	n/a	Р	n/a	n/a						
Local / Greater London / Wider Region / Global						n/a	L		L/ GL	n/a	n/a	n/a	L/ GL	L/ GL	n/a	L	n/a	n/a						
EQIA					•				•		•					•	•			•				
Short Term	+	+	+	+	n/a	+	+	+	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+/?
Medium Term	++	++	+	+	n/a	+	+	+	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+/?
Long Term	++	++	+	+	n/a	+	++	++	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+/?
Direct / Indirect	D	D	_	ı	D	D	D	D	D	D	D	n/a	D	D	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent	Р	Р	Р	Р	Р	Р	T/P	T/P	T/P	T/P	T/P	n/a	T/P	Р	n/a		n/a	n/a	n/a	Р	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	n/a	L/ GL	L/ GL	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L										
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Direct / Indirect	ı	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	Р	Р	Р		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global CSIA	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		L
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L/ GL									6:						

#### Objectives

- 1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 7. 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

#### 1. Initial assessment:

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Updated policy references – no material impact.

Table 3.2 row iv): inclusion of outside amenity space rather than open space

Table 3.2 additional bullet point added

- be positioned to allow overlooking

Inclusion of commitment to Supplementary Planning Guidance on daylight and sunlight standards.

#### Panel recommendation changes

The panel report suggested that the policy wording and the supporting text wording provided in paragraph 3.4.5 around single aspect dwellings were inconsistent, with the policy wording providing greater flexibility than the supporting text. The supporting text has therefore been amended, in line with the recommendation, to be more aligned with the text of the policy. Given that the policy wording has not been amended, this alteration is not deemed to represent a change to the policy requirements this is considered a non- material change.

# 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No identified impacts.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 1. Equality and inclusion

Requiring communal outside amenity spaces to be positioned to allow overlooking could result in more people, including children, some disabled people and older people with specific conditions or impairments, being able to utilise the space more, either due to the confidence overlooking can provide for family members and/ or carers, being able to utilise the space more independently, or due to perceived personal safety improvements, which could in turn encourage them to use it/ increase the likelihood of them using it. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

# Objective 3. Health and health inequalities

Requiring communal outside amenity spaces to be positioned to allow overlooking could represent a positive impact in terms of increasing residents' levels of or opportunity to undertake physical activity, therefore potentially improving the physical and mental health and wellbeing of communities. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix

#### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

**Objective 4 Crime, safety and security** 

The new requirement for outside amenity space to be positioned to allow overlooking could have a positive impact on reducing levels of crime and the opportunity for crime and antisocial behaviour, as well as potentially improving perceptions of safety and reducing fear of crime to help remove barriers to activities leading to social isolation.

Residents may feel more confident using areas of outside amenity space which are overlooked, due to the reassurance provided by overlooking, and the overlooking may result in residents taking more ownership of the spaces, potentially resulting in an increase in the reporting of incidents they are not comfortable with. This is likely to have positive impacts in the short term with more significant positive impacts in the medium and longer term. Matrix updated.

#### 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

Yes, for: age, disability, race, sex, sexual orientation and gender reassignment

#### b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 1. Equality and inclusion

Requiring communal outside amenity spaces to be positioned to allow overlooking could represent a positive impact for those who would benefit from overlooking/ being able to observe the outside spaces, specifically this could result in more people, including children, some disabled people and older people with specific conditions or impairments for example dementia being able to utilise the space more due to the confidence overlooking can provide for themselves or family members and/ or carers. This is likely to have positive impacts in the short term with more significant positive impacts in the medium and longer term. Matrix updated.

#### Objective 2. Social integration

Requiring communal outside amenity spaces to be positioned to allow overlooking could represent a positive impact for those who would benefit from overlooking/ being able to observe the outside spaces, specifically this requirement could result in more people, including children, some disabled people and older people with specific conditions or impairments for example dementia being able to utilise the space more due to the confidence overlooking can provide for themselves or family members and/ or carers. This is likely to have positive impacts in the short term with more significant positive impacts in the medium and longer term. Matrix updated.

#### **Objective 3 Health and health inequalities**

Requiring communal outside amenity spaces to be positioned to allow overlooking could represent a positive impact for those who would benefit from overlooking/ being able to observe the outside spaces, specifically this requirement could result in more people, including children, some disabled people and older people with specific conditions or impairments for example dementia being able to utilise the space more due to the confidence overlooking can provide for themselves or family members and/ or carers.

This could increase the use of these spaces, increasing residents' levels of physical activity which can have a positive impact on both their physical and mental health and wellbeing. This is likely to have positive impacts in the short and medium term with more significant positive impacts in the longer term. Matrix updated.

#### **Objective 4. Crime, safety and security**

The requirement of outside amenity space to be positioned to allow overlooking could have a positive impact on reducing levels of crime and the opportunity for crime and antisocial behaviour, as well as potentially improving perceptions of safety and fear of crime to help remove barriers to activities leading to social isolation.

Residents may feel more confident using areas of outside amenity space which are overlooked, due to the reassurance provided by overlooking, and the overlooking may result in residents taking more ownership of the spaces, potentially resulting in an increase in the reporting of incidents they are not comfortable with.

Crime is often cited as a major concern for older people (Kings College London (2015) An Age Friendly Cityhow far has London come?) and experience of crime is higher for disabled people with certain impairments (EHRC (2016 update) Crime and disabled people: Measures of disability- related harassment) with these groups potentially benefitting more from the change.

In addition, people who come under the protected characteristic of gender reassignment are more likely to have experienced a hate crime or incident than some other members of the population), as are lesbian, gay and bisexual people. The FSC therefore represents a potential positive impact for these groups as well (Stonewall LGBT facts and figures). This is likely to have positive impacts in the short term with more significant impacts in the medium and longer term. Matrix updated.

#### **Objective 7 Design**

The requirement of outside amenity space to be positioned to allow overlooking could have a positive impact in relation to design on not only reducing levels of crime and the opportunity for crime and antisocial behaviour, but also potentially improving perceptions of safety and fear of crime to help remove barriers to activities leading to social isolation.

Residents may feel more confident using areas of outside amenity space which are overlooked, due to the reassurance provided by overlooking, and the overlooking may result in residents taking more ownership of the spaces, potentially resulting in an increase in the use of these spaces which can in turn promote social integration and interaction with others using them. This is likely to be beneficial for groups who are at higher risk of social isolation such as BAME Londoners aged 20-24 years, disabled and older Londoners and men<sup>1</sup>. This is likely to have positive impacts in the short, medium and longer term. Matrix updated.

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

#### **D4 Housing Standards**

IIA Element												IIA Ob	jectives	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	+		n/a	?/+	+	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	0	?	+
Medium Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	0	?	+
Long Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	0	?	+
Direct / Indirect						ı	I/D		n/a	ı	D	n/a	n/a	n/a	n/a	n/a	I/D	n/a	I/D	D	n/a	ı	I/D	I/D
Temporary / Permanent						T/P	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	Р	n/a	Р	T/P	Р
Local / Greater London / Wider Region / Global						L/G L	L/G L		n/a	L/G L	L/G L	n/a	n/a	n/a	n/a	n/a	L	n/a	L	L	n/a	L	L	L
EQIA										1	ı	_			1			1				1		
Short Term	+	+	+	+	+	?	0/ +	+	0	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Medium Term	++	++	+	++	+	?	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Long Term	++	++	++	++	+	+	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	ı	ı	ı	D	D	ı	I/D	I/D	I/D	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	ı	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	Р
Local / Greater London / Wider Region / Global	L/G L	L/G L	L	L/G I	L/G L	L/G I	L/G L	L/G I	L/G I	n/a	L/G I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/G	n/a	n/a	n/a	L
HIA		_													<u> </u>			<u> </u>						
Short Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Long Term	+	+	++		++				n/a	n/a				n/a	++		?	n/a		+	n/a	n/a		+
Direct / Indirect	ı	ı	D		ı				n/a	n/a				n/a	I/D		I/D	n/a		D	n/a	n/a		I/D
Temporary / Permanent	T/P	T/P	ı		Т				n/a	n/a				n/a	T/P		T/P	n/a		Р	n/a	n/a		Р
Local / Greater London / Wider Region / Global	L/G L	L/G L	T/P		L				n/a	n/a				n/a	L		L	n/a		L	n/a	n/a		L
CSIA																								
Short Term				+					n/a															
Medium Term				++					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/G L					n/a															

- 1. 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
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- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: Chapter 3 Design	<b>Policy:</b> D5 Accessible housing (Policy D7)
1. Initial assessment:	
a. brief summary of extent of changes and whe the policy	ether the change is already reflected somewhere in
Updating policy references - no-material change	
	per size typology (i.e. x no. of y bed units) which are ards must comply with Part M4(3)(2)(b) wheelchair
2. SEA (Strategic Environmental Assessment)	
2a. are the changes likely to have an impact on	any of the objectives with SEA guide questions?
No Impacts	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact on	any of the objectives with HIA guide questions?
No impacts	
4. CSIA (Community Safety Impact Assessmen	nt)
4a. are the changes likely to have an impact on	any of the objectives with CSIA guide questions?
No Impacts	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on o	one or more protected characteristics?
b. If yes, summarise the impact on the protect	ed characteristic(s).

L

Chapter: 3 Design	<b>Policy:</b> Policy D6 Optimising Density

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Structural changes to Policies D1 London's form and characteristics, D2 Delivering good design and D6 Optimising Density have been made to provide a stronger narrative and clarity as to how to be implemented. There are now four distinct policies (Policies D1, D1A, D1B and D2) and Policy D6 Optimising Density no longer exists as its contents have been incorporated into the other four policies.

The IIA for each of the four policies (Policies D1, D1A, D1B and D2) address the elements of Policy D6 that have been incorporated into them and thus there is not a separate assessment of these changes for Policy D6.

Chapter: 3 Design	<b>Policy:</b> D7 Public Realm (Policy D8)

#### a. brief summary of extent of changes

Addition of requirement that opportunities for the creation of new public realm are explored.

Including additional reference to lighting in the policy, as well as the reference (retained) in the supporting text.

Further explanation of green infrastructure and microclimate factors – these issues are included in Part H and I.

#### Addition of reference to:

- consideration of different comfort levels
- balancing the consideration of commercial events against the wider public use of the public realm for certain periods of time

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 7 Design

- The encouragement of the creation of new public realm, alongside other elements of the policy such as ensuring appropriate lightning, the promotion of green infrastructure and ensuring the public realm is safe and inclusive, all contribute to conserving and enhancing the townscape/cityscape character which is likely to encourage more people to walk and cycle.
- Clarifying and reinforcing that lighting in the public realm requires careful consideration and design to ensure that intrusive lighting infrastructure and light pollution are minimised by including this in the policy as well as supporting text could have a positive impact for people who are blind or partially sighted, or older people with certain eye conditions that may be more sensitive to light.

Overall this should result in a direct beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level. Matrix updated.

#### Objective 9 Connectivity

• The encouragement of the creation of new public realm, alongside other elements of the policy such as ensuring appropriate lightning, promotion of green infrastructure and ensuring the public realm is safe and inclusive all help to encourage a modal shift to more sustainable forms of travel. These impacts are already reflected in the matrix as being likely to have an indirect or direct impact in the short term (0), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level, and for Greater London.

#### Objective 11 Infrastructure

• The encouragement of the creation of new public realm will help to contribute to the sufficient provision of environmental, social and physical infrastructure which is important in supporting both economic competitiveness and housing delivery. This should result in an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, for Greater London, and the wider Region. Matrix updated.

#### Objective 14 Air Quality

• The encouragement of the creation of new public realm, alongside other elements of the policy such as the promotion of green infrastructure and the consideration of microclimatic factors all contribute

to helping to reduce NOx, PM10 and PM2.5 emissions and improving air quality. These impacts are already reflected in the matrix as being likely to have an indirect or direct impact in the short term (0), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level.

#### Objective 19 Flood Risk

• The encouragement of the creation of new public realm alongside other policies in the Plan such as G5 Urban Greening and SI13 Sustainable Drainage may help to reduce discharge to surface and ground water and have a positive benefit in terms of reducing flood risk. These impacts are already reflected in the matrix as being likely to have an indirect or direct impact in the short term (0), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London.

# Objective 20 Natural Capital and Natural Environment

• The encouragement of the creation of new public realm, and the provision of further detail on green infrastructure and appropriate lighting will help to protect and enhance the character of local green spaces. This impact is already reflected in the matrix as being likely to have an indirect or direct beneficial impact in the short term (+), medium term (++) and long term (++). The impact is likely to be temporary or permanent and relevant at a Local level.

# 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

Objective 1 Equality and Inclusion and Objective 2 Social Integration

- The encouragement of the creation of new public realm is likely to be beneficial in terms of potentially providing greater opportunities for people to choose an active, fulfilling life, thereby helping to reduce inequality and disadvantage and promoting social integration. However, the impact may differ dependent on the type of public realm created. If an area is pedestrianised, where vehicles could previously go, this could result in a positive impact for people with certain impairments who would benefit from the additional space for pedestrians. However this may also result in a negative impact for others who are more reliant on motor vehicles dropping them close to the entrance of facilities or services that they wish to access i.e. people with very limited travel distance so pedestrainising an area may mean nearby drop off would no longer be possible.
- Balancing the consideration of commercial events against the wider public use of the public realm for
  certain periods of time could have a negative impact for some groups. Spaces being used for
  commercial events could cause an obstruction, or additional travelling distances which could be
  problematic for some disabled people for whom travel distances are critical, blind and partially
  sighted people who may have difficulties navigating around 'events', or people with certain
  neurodiverse conditions who may have difficulties navigating the changes in the route/ environment.

Overall these impacts should result in an unknown indirect impact in the short term, medium term and long term. The impact should be temporary or permanent and relevant at a Local level, Greater London, and for the wider Region. Matrix updated for both objectives.

### Objective 3 Health and Health Inequalities

• The encouragement of the creation of new public realm may help to contribute to improvements in the physical and mental health and wellbeing of communities and reduce inequalities in levels of physical activity by providing greater opportunities for people to be active. These impacts are already reflected in the matrix as being likely to have an indirect or direct impact in the short term (+), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level, for Greater London and for the Wider region.

#### Objective 14 Air Quality

• Along with design and environmental policies such as D3 Inclusive Design, T2 Healthy Streets, G4 Open Space, G5 Urban Greening, SI1 Air Quality and SI4 Managing Heat Risk, the encouragement of the creation of new public realm, with further detail on green infrastructure and microclimatic factors are likely to positively impact air quality and potentially help to mitigate the impact of the heat island effect. These impacts are already reflected in the matrix as being likely to have as being likely to have an indirect or direct impact in the short term (0), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level.

# 4. CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4 Crime, safety and security

• The encouragement of the creation of new public realm is likely to mean more people are likely to congregate in a given area. Part A of the policy already requires the public realm to be designed to be well-designed, safe, attractive and inclusive. The addition of the reference to appropriate lighting into the policy will also help to reduce the opportunity for crime and antisocial behaviour and potentially reduce overall levels of crime. These impacts are already reflected in the matrix as being likely to have as being likely to have a direct impact in the short term (+), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London.

#### Objective 9 Connectivity

• The encouragement of the creation of new public realm, alongside other elements of the policy such as ensure the public realm is safe, attractive and inclusive as well as reference to appropriate lighting are likely to encourage more active travel by creating safe, attractive routes. These impacts are already reflected in the matrix as being likely to have as being likely to have a direct impact in the short term (+), medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London.

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, for: Disability, age, race.

b. If yes, summarise the impact on the protected characteristic(s).

Objective 2 Social Integration

- The creation of new public realm may also offer greater opportunity for the potential for a wider range of events which can provide more opportunities for Londoners of every background to connect help to advance equality of opportunity and foster good relations particularly for older Londoners who are more likely to experience social isolation. This is therefore likely to be beneficial for groups who are at higher risk of social isolation such as BAME Londoners aged 20-24 years, disabled and older Londoners and men<sup>1.</sup>
- Balancing the consideration of commercial events against the wider public use of the public realm for certain periods of time could have a negative impact for some groups. Spaces being used for commercial events could cause an obstruction, or additional travelling distances which could be problematic for some disabled people for whom travel distances are critical, blind and partially sighted people who may have difficulties navigating around 'events', or people with certain neurodiverse conditions who may have difficulties navigating the changes in the route/ environment.

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

However the impacts are largely dependent on how the policy is implemented and managed at the local level.

Overall these changes are likely to have a direct impact in the short term (+), medium term (+) and long term (0/+). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London. However, overall, other elements of the policy ensure that the current scoring of the matrix is not affected.

#### Objective 3 Health and health inequalities

• Increasing Londoners' access to areas of public realm and the requirement for areas of public realm to be inclusive, could potentially make areas of public realm and the external environment more welcoming and increase people's likelihood to use active travel modes, which could in turn help to reduce inequalities in physical and mental health and wellbeing as the policy will help to bring forward safe, welcoming, secure and inclusive places and spaces. This is likely to have a positive impact for groups who may be more likely to experience barriers to access or inclusion- including disabled and older people. As well as groups at greater risk of poor mental health which includes young women, people aged 35-44, and disabled adults<sup>2</sup>. These impacts are already reflected in the matrix as being likely to have as being likely to have a direct impact in the short term (+), medium term (+) and long term (++). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London.

# Objective 4 Crime, safety and security

• Ensuring appropriate lightning will help to contribute to creating a travel environment that feels safe to all users during the day time and night. This is likely to be beneficial for a number of groups of people who come under a protected characteristic as people within certain protected characteristic groups are more likely to experience fear of crime. BAME people are more likely to be victims of hate crime, feel unsafe in their local area and worried about physical attack and acquisitive crime than white people, and people who share the protected characteristic of gender reassignment are more likely to be victims of crime than some other members of the population. These policies may therefore result in a positive impact, creating a safe secure environment that people have confidence accessing and using. These impacts are already reflected in the matrix as being likely to have a direct neutral impact in the short term (0), and positive impact in the medium term (+) and long term (+). The impact is likely to be temporary or permanent and relevant at a Local level and for Greater London.

# Objective 13 Culture

• The addition of the reference of boroughs considering the need to balance commercial events against the wider public use of the public realm for certain periods of time may potentially improve participation in cultural activities by creating more opportunities for certain these types of activities in a local area. This could benefit older people, disabled people and members of the BAME community, some of whom are less likely to participate in cultural activities (Summary Document). However, the impacts of this is unknown and depend on how this is managed at the local level, particularly in relation to the types of events and how often they are on for. These impacts are likely to have an indirect impact in the short term (?/+), medium term (?/+) and long term (?/+). The impact should be temporary and relevant at a Local level. Matrix updated.

#### Objective 14 Air Quality

Along with design and environmental policies such as D3 Inclusive Design, T2 Healthy Streets, G4
Open Space, G5 Urban Greening and SI1 Air Quality, the encouragement of the creation of new
public realm is likely to reduce inequalities in air quality particularly benefiting those people who may
be more susceptible to poorer air quality such as children and older people, as age is an important
factor in relation to the susceptibility of the health effects of air pollution. These impacts are already
reflected in the matrix as being likely to have an indirect neutral impact in the short term (0), and

<sup>&</sup>lt;sup>2</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

positive impact in the medium term (+) and long term (+). The impact should be temporary or permanent and relevant at a Local level and for Greater London.

#### **D7 Public Realm**

IIA Element				IIA						IIA Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1			•	•		1		1	Ι				1	1						
Short Term						?	+		0	n/a	+	n/a	n/a	0	0	0	n/a	0	0	+	0	+	n/a	n/a
Medium Term						+	+		+	n/a	+	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Direct / Indirect						ı	D		I/D	n/a	1	n/a	n/a	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	Р		T/P	n/a	Р	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L		L/ GL	n/a	L/ GL /W	n/a	n/a	L	L/ GL /W	L	n/a	L/ GL	L/ GL	L	L	L	n/a	n/a
EQIA		•			•				•															
Short Term	+	+	+	0	n/a	?	+	+	+	n/a	0	n/a	?/+	0	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	0	+	+	+	n/a	+	n/a	?/+	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Long Term	++	++	++	+	n/a	+	+	+	+	n/a	+	n/a	?/+	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Direct / Indirect	D	D	D	D	n/a	ı	ı	ı	ı	n/a	D	n/a	1	ı	n/a		n/a	n/a	n/a	ı	ı	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	Т	T/P	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a	L	L/ GL	n/a		n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a
HIA				1		1							ı			1			1					
Short Term	?	?	+		n/a				+	n/a				0	+		n/a	n/a		+	n/a	n/a		n/a
Medium Term	?	?	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Long Term	?	?	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Direct / Indirect	1	1	I/D		n/a				D	n/a				I/D	I/D		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	T/P		n/a	n/a		T/P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L/ W		n/a				L/ GL	n/a				L	L		n/a	n/a		L	n/a	n/a		n/a
CSIA	1									<u> </u>				<u> </u>				l		·				
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L/ GL									7:	3					

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 3 Design	Policy: D8 Tall Buildings (Policy D9)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Addition of reference to/of:

- Minimising light pollution from internal and external sources under Part C 1) h).
- Acknowledgement that tall buildings can contribute to economic growth and the provision of new homes (paragraph 3.8.1). This reference replaces a similar statement that was originally under Part B.
- Minimising external lighting for tall buildings and any negative impacts arising as a result of this kind of development on designated heritage assets and their setting in paragraph 3.8.7.

Part B of the policy restructured to clarify the steps that boroughs should take to determine if there are any locations where tall buildings may be an appropriate form of development and how any such locations should be identified.

Part C removal of unnecessarily repetitive text.

Removal of the requirement that development proposals address the impacts of required infrastructure improvements being delivered and phased appropriately, and the cross reference to the now deleted policy D6 Optimising Density under Part C 2) e). This policy requirement was already covered in Policy D6 part B which is now part of policy D1A and the Plan must be read as a whole – no material change

Deletion of cross reference to Policy D2 in paragraph 3.8.1

Addition of a new paragraph at 3.8.1A providing further detail to support Part B.

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• Encouraging boroughs to determine if there are any locations that may be suitable for tall buildings and explaining how this should be done is likely to positively contribute to helping to ensure the best use of land through appropriate development that is well considered based on a robust evidence base. These impacts are already reflected in the matrix as being likely to have an indirect temporary or permanent impact in the short term (0), the medium term (+) and long term (+) with relevance at a Local level.

#### Objective 7 Design

- Alongside other design policies, including the design-led approach and ensuring a robust evidence base for the identification of locations suitable for tall buildings is likely to positively contribute to high quality design and sustainable growth.
- Boroughs are required to consider a range of potential visual, functional and environmental impacts
  before determining and identifying any locations where tall buildings may be an appropriate form of
  development, subject to meeting the other requirements of the Plan. This exercise will mean that
  future tall buildings will only be brought forward in locations where they could have a role in
  contributing to the emerging character and vision for a place.

This is likely to have an indirect beneficial impact in the short term (+), medium term (+) and long term (+). The impact should be permanent and relevant at a Local level, and for Greater London. Matrix updated.

#### Objective 10 Economic competitiveness and employment

• Making sure that potential tall building locations are based on a robust evidence base that justifies why this type of development may be appropriate in the specific context, and conversely why other locations are not appropriate for this type of development, will give more certainty to all stakeholders about the what future growth is likely to look like. This will likely have a positive impact by helping to improve the resilience of the economy and contribute to facilitating the provision of the right type of employment floorspace in the right places to ensure that London remains economically competitive. These impacts are already reflected in the matrix as being likely to have an indirect impact in the short term (+), the medium term (+) and long term (+). The impact should be permanent and relevant at a Local level.

#### Objective 21 Historic Environment

• Given the scale of tall buildings, external lighting can have significant negative impacts on the surrounding context because there is the potential for light sources from tall buildings to be seen from much further away than other smaller scale types of development. Minimising external lighting for tall buildings and requiring that the potential impacts of this type of lighting on heritage assets and their settings are considered and minimised will, in particular, minimise light pollution and ensure that tall buildings respond to and respect local character and distinctiveness, and help to protect heritage assets, their settings and the wider historic environment from glare, skyglow and light trespass encroaching on appreciation or understanding of significance. This is likely to have a direct positive impact in the short term (+), the medium term (+) and long term (+). The impact should be temporary or permanent and relevant at a Local level. Matrix updated.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

N/A

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

#### **D8 Tall Buildings**

IIA Element												IIA Obj	ectives	<u> </u>										
=	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						0	+		n/a	+	+	n/a	n/a	0	n/a	n/a	+	n/a	n/a	n/a	+	+	n/a	0
Medium Term						+	+		n/a	+	+	n/a	n/a	0	n/a	n/a	+	n/a	n/a	n/a	+	+	n/a	0
Long Term						+	+		n/a	+	+	n/a	n/a	0	n/a	n/a	+	n/a	n/a	n/a	+	+	n/a	0
Direct / Indirect						I	I		n/a	I	D	n/a	n/a	ı	n/a	n/a	n/a	n/a	n/a	n/a	D	D	n/a	D
Temporary / Permanent						T/P	Р		n/a	Р	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	Р	n/a	T/P
Local / Greater London / Wider Region / Global						L	L/G L		n/a	L	L/G L	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L	n/a	L
EQIA	•	•	•	•				•						•				•		•		-		
Short Term	0	0	n/a	n/a	0	+	+	0	0	0	0	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	0	n/a	n/a	0
Medium Term	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	0
Long Term	+	+	n/a	n/a	+	+	++	+	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	+
Direct / Indirect	D	D	n/a	n/a	D	D	D	D	I	I	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	ı
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P						
Local / Greater London / Wider Region / Global	L/G L	L/G L	n/a	n/a	L/G L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	L/G L	n/a	n/a	L/G L						
HIA Chart Tarre									Г	Π								1		Г	Г	1		
Short Term	n/a	?	n/a		+				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	n/a		0
Medium Term	n/a	?	n/a		+				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	n/a		0
Long Term	n/a	?	n/a		+				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	n/a		0
Direct / Indirect	n/a	ı	n/a		ı				n/a	n/a				ı	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	Р	n/a		T/P				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	L	n/a		L				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA Short Term				1																				
				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					ı															
Temporary / Permanent				n/a					Р															
Local / Greater London / Wider Region / Global				n/a					L															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and

Chapter: 3 Design	Policy: D9 Basement Development (Policy D10)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part A amended to make it clear that the policy only applies where it has been identified as a local issue.

Stronger requirement for assessing flood risk issues in paragraph 3.9.5.

New paragraph inserted (3.9.5AA) to encourage consideration of potential noise and vibration impacts related to existing infrastructure on the living conditions of residents in the vicinity of proposed basement developments prior to construction and ensure these are effectively managed.

#### Panel recommendation changes

Part A amended to clarify where the policies that boroughs are required to establish should be developed i.e. in development plans – no material change.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 15 Climate change adaptation and mitigation

• By acknowledging that the potential cumulative impacts of flooding may make basement development unsuitable for use as habitable rooms and encouraging boroughs to restrict the use of basements for non-habitable uses the policy is likely to help London to function during a flood event or period of heavy rainfall. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### Objective 19 Flood Risk

• Ensuring that basements in identified flood prone areas are non-habitable is likely to improve the resilience of properties to flooding. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### Objective 24 Noise and vibration

• Considering potential noise and vibration impacts as a result of basement development prior to construction will help reduce actual noise and vibration levels and disturbances from noise and vibration on residents in the vicinity during construction. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

# 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 24 Noise and Vibration

• Considering potential noise and vibration impacts as a result of basement development prior to construction will help reduce the number of people exposed to noise and vibrations of levels high enough to potentially cause annoyance, sleep disturbance or physiological effects. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

# 5. EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics** Yes for: disability, age, pregnancy & maternity.

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 15 Climate change adaptation and mitigation

• By encouraging the restriction of the use of basements for non-habitable uses in known flood risk areas, the policy is likely to reduce impacts on groups more vulnerable to this potential effect of climate change. This is likely to benefit some disabled people, older people and families with young children who may find it more difficult to evacuate from a building if needed. Not having habitable accommodation at basement level may also increase the proportion of a dwelling's floor area which is likely to be accessible, adaptable or visitable for people who require step-free access - this is likely to include disabled people and older people. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### Objective 19 Flood Risk

• Ensuring that basements in identified flood prone areas are non-habitable will minimise the risk of flooding and the effects of it on people. In particular, this could help to result in a positive impact for those that can be particularly impacted by the negative effects of intense and severe weather, including disabled people who may find it more difficult to evacuate from a building if needed. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### **D9 Basement Development**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	Ī	1	1	1	<b>i</b>		Γ	1	Γ								Ι				ı			
Short Term						+	n/a		n/a	n/a	n/a	n/a	n/a	0	+	0	n/a	n/a	+	0	0	?	n/a	+
Medium Term						+	n/a		n/a	n/a	n/a	n/a	n/a	0	+	0	n/a	n/a	+	0	0	?	n/a	+
Long Term						+	n/a		n/a	n/a	n/a	n/a	n/a	0	+	0	n/a	n/a	+	0	0	?	n/a	+
Direct / Indirect						D	n/a		n/a	n/a	n/a	n/a	n/a	ı	D	ı	n/a	n/a	D	I/D	I/D	D	n/a	D
Temporary / Permanent						T/P	n/a		n/a	n/a	n/a	n/a	n/a	T/P	Р	T/P	n/a	n/a	Р	T/P	T/P	Р	n/a	Р
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	n/a	n/a	n/a	L	L	L	n/a	n/a	L	L	L	L	n/a	L
EQIA	•	•		•	'			•													'			
Short Term	n/a	n/a	0/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	+		n/a	n/a	+	n/a	n/a	n/a	n/a	0/-
Medium Term	n/a	n/a	0/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	+		n/a	n/a	+	n/a	n/a	n/a	n/a	0/-
Long Term	n/a	n/a	0/-	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	+		n/a	n/a	+	n/a	n/a	n/a	n/a	0/-
Direct / Indirect	n/a	n/a	D	n/a	ı	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	D		n/a	n/a	D	n/a	n/a	n/a	n/a	I/d
Temporary / Permanent	n/a	n/a	Т	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Т	Р		n/a	n/a	Р	n/a	n/a	n/a	n/a	Т
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	L		n/a	n/a	L	n/a	n/a	n/a	n/a	L
HIA		l								I	Ì										I			
Short Term	n/a	n/a	0/-		n/a				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	?		+
Medium Term	n/a	n/a	0/-		n/a				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	?		+
Long Term	n/a	n/a	0/-		n/a				n/a	n/a				0	n/a		n/a	n/a		n/a	n/a	?		+
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				D	n/a		n/a	n/a		n/a	n/a	D		D
Temporary / Permanent	n/a	n/a	Т		n/a				n/a	n/a				Т	n/a		n/a	n/a		n/a	n/a	T/P		Р
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	L		L
CSIAL Character Towns				1		l			ı					l	l							1		
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 3 Design	<b>Policy:</b> D10 Safety, security and resilience to
	emergency (Policy D11)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Corrections to part A to update the name of the London Fire Commissioner. No material change.

Addition of reference to extreme weather for the list of potential physical risks to building resilience under Part B.

# Panel recommendation changes

Part A amended to clarify what boroughs should do, through development plans, in terms of policy and any allocations for necessary infrastructure. No material change.

#### 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 15 Climate change adaptation and mitigation

• Ensuring that the potential impacts of extreme weather on building resilience are considered as part of the design of development design will help protect London from climate change impacts. This is likely to have a direct and permanent neutral impact in the short term (O) and positive impact in the medium term (+) and long term (+) for the Local, Greater London and Wider Region. Matrix to be updated.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

N/A

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4 Crime, safety and security

• The panel recommendation to clarify Part A so that it expresses what boroughs should do through development plans, in terms of policy and any allocations for necessary infrastructure will help boroughs to forward plan for and then maintain a safe and secure environment and reduce the fear of crime. This is likely to contribute to safety and security and the perceptions of safety, and reduce the opportunity for crime and antisocial behaviour and reduce levels of crime across London. This is likely to have an indirect and permanent impact in the short term (0) and positive impact in the medium term (+) and long term (+) for the Local level and for Greater London. Matrix to be updated.

# 5. EqIA - Equality Impact Assessment

**a.** are the changes likely to have an impact on one or more protected characteristics? Yes including for: disability, age, pregnancy & maternity.

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 15 Climate change adaptation and mitigation

Developments that are resilient to physical risks arising as a result of extreme weather will reduce impacts on groups more vulnerable to the effects of climate change, including younger people, older people, some disabled people, and pregnant women who are more likely to experience negative effects of excess heat, as well as older people and some disabled people who may be more 'at risk' in the event of a flood. This is likely to have a direct and permanent neutral impact in the short term (O), and positive impact in the medium term (+) and long term (+) for the Local, Greater London and Wider Region. Matrix to be updated.

#### **D10 Safety and Security**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																1			_					
Short Term						n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	Р	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	L/G L/ W	n/a	n/a	n/a	L/G LW	n/a	n/a	n/a	n/a	n/a
EqIA		1			•	ı		1	ı	1	ı	ı					ı	ı		<u> </u>		1	1	
Short Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	0		n/a	n/a	0	?	n/a	n/a	n/a	n/a
Medium Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	+		n/a	n/a	+	?	n/a	n/a	n/a	n/a
Long Term	+	n/a	+/?	+	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	+/?	n/a	+		n/a	n/a	+	?	n/a	n/a	n/a	n/a
Direct / Indirect	ı	n/a	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	I	n/a	D		n/a	n/a	I/D	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	Р		n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	n/a	L/G L	L/G L	n/a	n/a	L/G L	n/a	n/a	n/a	n/a	n/a	L/G L	n/a	L/G L/ W		n/a	n/a	L/G LW	L/G L	n/a	n/a	n/a	n/a
HIA	-														1			1						
Short Term	0/+	0/+	0/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	0/+	0/+	0/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	0/+	0/+	0/+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
CSIA																				1				_
Short Term				0					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				ı					n/a															
Temporary / Permanent				Р					n/a															
Local / Greater London / Wider Region / Global				L/G L					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: Chapter 3 Design	<b>Policy:</b> Policy D11 Fire safety (Policy D12)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part A insertion of 'all' in relation to the development proposals which must achieve the highest standards of fire safety – no material change

Clarification that fire safety and safety measures should be considered in conjunction with each other with reference to consultation with the London Fire Brigade and Metropolitan Police.

Clarification that the policy applies to refurbishments

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

# Objective 7. Design

Explicit acknowledgment that the policy applies to all development and that fire and security issues are considered in conjunction with each other is likely to result in better design solutions and could result in a positive impact in terms of encouraging an inclusive design approach and promoting high-quality design which is suitable for a range of users. This is likely to have positive impacts in the short, medium, and longer term. These impacts are already reflected in the current scoring of the matrix.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

Nο

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

#### Objective 4. Crime, safety and security

The additional text under 3.11.5A6 explains that fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures, and that these should not adversely impact on the means of escape nor prevent entry or access of the fire and rescue service. It goes on to recommend that early consultation between the London Fire Brigade and the Metropolitan Police Service take place to resolve any issues. This should result in a positive impact and successful developments in terms of the creation of a safe and secure environment.

The additional clarity and subsequent potential improvements to the implementation of this policy represented by the FSCs should result in a positive impact in terms of increasing security and resilience to major incidents. This should have a positive impact in the short term with more significant impacts in the medium and longer term. These impacts are already reflected in the current scoring of the matrix.

#### 5. EqIA - Equality Impact Assessment

**a. are the changes likely to have an impact on one or more protected characteristics?** Disability, age, pregnancy and maternity.

# b. If yes, summarise the impact on the protected characteristic(s).

# **EqIA** objective 1. Equality and Inclusion

Additional clarity, subsequent potential improvements to the implementation of this policy represented by the FSCs and added emphasis on the Mayor's overall ambition to ensure that making buildings safe is considered as a matter of priority, could result in a particularly positive impact for disabled and older people. Disabled and older people are more likely to have mobility or other impairments which could impact on their ability to evacuate from a building if required, and statistically older people are more likely to die in a fire<sup>1</sup>. The FSCs could therefore represent a positive impact specifically for these groups.

Likewise, those who would come under the protected characteristic of pregnancy and maternity may also benefit from the FSCs as being pregnant or caring for a young child could also impact on how someone evacuates from a building in an emergency situation. This is likely to have additional positive impacts in the short, medium and longer term. Matrix amended.

# EqIA objective 5. Housing supply, quality, choice and affordability

Additional clarity, subsequent potential improvements to the implementation of this policy represented by the FSCs and added emphasis on the Mayor's overall ambition to ensure that making buildings safe is considered as a matter of priority, could result in a positive impact for disabled and older people in terms of increasing housing choice. Improvements in the implementation of D11 could result in accessible housing being provided in buildings which meet the highest standards of fire safety and are therefore more likely to meet the evacuation requirements of these groups. This is likely to have positive impacts in the short, medium, and longer term. Matrix updated.

<sup>&</sup>lt;sup>1</sup> Chief Fire Officers Association. Ageing Safety, Protecting an ageing population from the risk of fire in the home.

#### **D11 Fire Safety**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA													1											
Short Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	ı		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/G L		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EQIA																								
Short Term	++	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
Medium Term	++	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
Long Term	++	n/a	+	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
Direct / Indirect	I/D	n/a	ı	n/a	ı	n/a	ı	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
Temporary / Permanent	Р	n/a	Р	n/a	Р	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
Local / Greater London / Wider Region / Global	L	n/a	L	n/a	L	n/a	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a							
HIA																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	Р		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				+					n/a															
Medium Term				++					n/a															
Long Term				++					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				Р					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

**Objectives** 

- 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
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Chapter: 3 Design	<b>Policy:</b> D12 Agent of Change (Policy D13)
1. Initial assessment:	
a. brief summary of extent of changes and whe the policy	ther the change is already reflected somewhere in
Restructuring change. Supporting paragraph 3.12.6A change.	A brought forward to become 3.12.3A – not a material
Panel recommendation changes	
Parts A and B combined in recognition that part A rematerial change.	ead as statement of fact rather than policy – not a
•	cal decision making processes around the assessment of strated how noise and other nuisances will be mitigated
2. SEA (Strategic Environmental Assessment)	
2a. are the changes likely to have an impact on	any of the objectives with SEA guide questions?
NI /A	
N/A	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact on	any of the objectives with HIA guide questions?
N/A	
4. CSIA (Community Safety Impact Assessmen	t)
4a. are the changes likely to have an impact on	any of the objectives with CSIA guide questions?
N/A	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on $\alpha$ N/A	one or more protected characteristics?
b. If yes, summarise the impact on the protect	ed characteristic(s).
N/A	

Chapter: 3 Design	Policy: D13 Noise (Policy D14)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Amendments made to supporting paragraph 3.13.1:

- Clarify and reinforce that the policy applies to both internal and external spaces/places.
- Addition of term wildlife to clarify what is meant by the term 'species', and
- Addition of reference to parks and green spaces affected by traffic noise and pollution as an example of the type of places where it is important to be considerate of existing noise sensitivity.

# 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 7 Design

• The management of internal and external noise could positively contribute to helping to conserve and enhance the townscape/cityscape character and improve the wider built environment. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, and for Greater London. Matrix updated.

# Objective 20 Natural Capital and Natural Environment

• Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities for example in relation to sites, protected wildlife species and habitats, especially where there is a designation of international, national, regional or local importance. This is likely to result in a direct and permanent positive short term (+), medium term (+) and long term (+) impact at the local level, and for Greater London. Matrix updated.

#### Objective 24 Noise and vibration

• Requiring that the management of both internal and external noise should be an integral part of design processes and considered as early as possible will help to reduce actual noise levels and disturbances from noise. This is likely to result in a direct and permanent/temporary positive short term (+), medium term (+) and long term (++) impact at the local level, and for Greater London. These impacts are already reflected in the matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

#### Objective 3 Health and Heath Inequalities

• Requiring that the management of both internal and external noise should be an integral part of the design process and considered as early as possible is likely to contribute to improved physical and mental health and wellbeing of communities, for example for groups at greater risk of poor mental health, which includes young women, people aged 35-44, and disabled adults<sup>1</sup>. This is likely to result in direct and permanent positive short term (+), medium term (+) and long term (+) impacts at the local level, and for Greater London. These impacts are already reflected in the matrix.

#### Objective 24 Noise and vibration

• Consideration of existing noise sensitivity within an area, and how to manage noise to encourage the right acoustic environment in the right place at the right time is likely to help to reduce the number of people exposed to high levels of noise that have the potential to cause annoyance, sleep

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

disturbance or physiological effects. This is also likely to reduce night-time noise in residential areas and improve people's access to quiet/ tranquil spaces. This is likely to result in a direct and temporary/permanent positive short term (+), medium term (+) and long term (++) impact at the local level, and for Greater London. These impacts are already reflected in the matrix.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics? Yes for: disability, age.

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 3 Health and Heath Inequalities

Requiring that the management of both internal and external noise should be an integral part of the
design process and considered as early as possible is likely to reduce inequalities in physical and
mental health and wellbeing. Minimising noise can make an environment more welcoming for people
with certain neurodiverse conditions, for example autism or Asperger's who could be particularly
sensitive to 'sensory overload' triggered by noise. It may also be particularly relevant for babies and
young children and their families, and older people with certain age-related impairments who may be
more sensitive to noise. This is likely to result in an indirect and temporary or permanent positive
short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### Objective 7 Design

Requiring the management of both internal and external noise is likely to positively contribute to
helping make people feel positive about the area they live in. Specific benefits of noise management
could be experienced by disabled people with certain neurodiverse conditions, for example autism or
Asperger's who could be particularly sensitive to sensory overload triggered by noise. It may also be
particularly relevant for babies and young children and their families and older people with certain
age-related impairments who may be more sensitive to noise. This is likely to result in a direct and
temporary/permanent positive short term (+), medium term (+) and long term (+) impact at the local
level. Matrix updated.

#### Objective 20 Natural Capital and Natural Environment

• Consideration of existing noise sensitivity within spaces such as parks and green spaces affected by traffic noise and pollution will minimise potential conflicts of uses or activities in these spaces and make them more pleasant for people to spend time in. This may benefit those individuals who are likely to be more susceptible to poorer air quality such as babies, children or older people with certain age-related impairments who may also be more sensitive to noise, or people with dementia who may be more sensitive to noise. This is likely to result in a direct and temporary or permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### Objective 24 Noise and vibration

• Consideration of existing noise sensitivity within an area, and both internal and external noise is likely to help to minimise noise levels and disruption to people and communities across London and reduce inequalities in exposure where appropriate. This may be particularly relevant for babies and young children and their families, older people, and disabled people with certain impairments who may be more sensitive to noise. This is likely to result in a direct and temporary or permanent positive short term (+), medium term (+) and long term (+) impact at the local level. Matrix updated.

#### **D13 Noise**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	_		1			Ι			ı		ı	ı	ı	ı	l		I	ı		_		Ι		
Short Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+
Medium Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+
Long Term						n/a	+		n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	++
Direct / Indirect						n/a	D		n/a	ı	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent						n/a	Р		n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Р	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/G L		n/a	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	n/a	n/a	n/a	L/G L
EQIA																								
Short Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Long Term	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	?	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	n/a	n/a	-1	n/a	n/a	n/a	D	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent	n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	n/a	n/a	L	n/a	n/a	L/G L	n/a	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA	•											-	-	-										
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		++
Direct / Indirect	n/a	n/a	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	Р		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		L/G L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

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- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# Chapter 4 Housing

Chapter: Housing	Policy: H1 Increasing housing supply

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Some text in Part D of the policy has been deleted as it repeated national guidance by specifying that borough housing trajectories should identify sources of housing capacity including windfall capacity. As national guidance applies the removal of this text is non-material.

Supporting text in paragraph 4.1.3 has been deleted that referred to the rate of delivery of housing that will be needed to achieve the housing target compared to current completion. This text was deleted as it may not be accurate by the time the Plan is published and was not needed to implement the policy – non-material change.

Supporting text added regarding a mitigation strategy for Epping Forest Special Area of Conservation (SAC) being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, and that if future monitoring reveals adverse impacts these would be considered as part of assessing whether a review of the London Plan was required – non-material change.

# H3 Monitoring housing targets

The detail on how housing delivery will be monitored previously set out in Policy H3 has been incorporated into the supporting text of Policy H1.

Changes to the monitoring of non-self-contained student accommodation and communal accommodation have been made to mirror the ratios set out in the Government's Housing Delivery Test measurement tool book, which was not available when the draft Plan was published in 2017 - non-material change.

Supporting text (4.1.8B) has been added to provide clarification on how boroughs are expected to achieve the annualised 10-year housing delivery targets by considering setting out a realistic stepped housing delivery target over a ten-year period. The associated footnote with this new text clarifies that this would fulfil the requirements of the government's Housing Delivery Test. Linked to this clarification the 'annualised average' housing target for each borough has been deleted from Table 4.1 and Table 4.2.

NB. The updated IIA matrix table for H1 includes an assessment of incorporating the text from Policy H3.

#### Panel recommendation changes

The housing targets have been reduced for most boroughs following a reduction in the small sites target recommended by the Panel of Inspectors examining the Plan. As the reduction in housing targets relates to a reduction in the small sites component of the overall housing target the impacts for this change are assessed in the IIA for Policy H2.

Text from GG4 Part E has been copied into the policy and supporting text in response to the status of GG4 being changed from a policy to an objective. As this text was already in one of the Plan's policies that has been subject to the IIA this addition is considered to have no additional impacts and thus is non-material.

Additional text on monitoring housing supply has been added. This is considered a non-material change.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 6 Sustainable land use

• The clarification in the supporting text that boroughs can plan a stepped delivery of their housing target, will enable boroughs to plan the delivery of their overall target and not accept inappropriate

hosing development to meet an annualised average target. This will support boroughs in planning housing delivery to support sustainable patterns and forms of development and integrate land use and transport networks. This will have a positive short-, medium- and long-term impact.

No change to the matrix.

# **Objective 11 Infrastructure**

• The clarification in the supporting text that boroughs can plan a stepped delivery of their housing target will enable them to plan the delivery of their overall target and not accept inappropriate hosing development to meet an annualised average target. This will support boroughs in planning housing delivery to ensure that the infrastructure necessary to support new housing is delivered at the appropriate time. This will have a positive impact in the short term as well as the medium- and longer-term. Thus, the matrix should be updated with a positive + for the short term under objective 11.

Matrix to be updated.

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

NA

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

# **Further Suggested Changes**

Objective 5 Housing Supply, Quality, Choice and Affordability

• A stepped approach to housing delivery of a borough's overall housing target could mean that less housing is delivered in the early years of the Plan. This could potentially negatively affect BAME groups as they are likely to benefit from an increased supply of homes in general, and affordable homes in particular, because they are more likely to be living in poverty and/or in overcrowded housing¹. Overcrowding is an issue that affects a range of Londoners but is more likely to affect households that include children, and single parent families (which are most commonly headed by women²). Thus a lower delivery of housing could disproportionality affect these groups. In addition, this change may disproportionately impact LGBT+ youth who are more likely to be homeless than non-LGBT peers, given increased likelihood of familial rejection. However, the change to the supporting text allowing a stepped approach to delivery reflects the reality that gearing up to deliver a higher target may take time and that some sites, by their nature, will not come forward until later in the ten-year period. The change primarily helps ensure that boroughs can reflect the realistic phasing of sites in their area and not be unfairly penalised by being assessed against an annualised

<sup>&</sup>lt;sup>2</sup> Around 90% of lone parents (UK wide) are women (ONS 2019)

average for the housing delivery test. Thus, it is considered unlikely that this change will have a negative effect. – no change to the matrix.

No change to the matrix.

<sup>&</sup>lt;sup>1</sup> New Policy Institute. London's Poverty Profile 2015 (2011 Census)

# **H1** Housing Supply

IIA Element												IIA Obj	ectives	S										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1	1	1							ī	ı					ı	Γ					
Short Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Medium Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Long Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Direct / Indirect						D	D		ı	D	ı	n/a	n/a	ı	n/a	ı	n/a	n/a	n/a	ı	n/a	D	n/a	n/a
Temporary / Permanent						T/P	Р		T/P	Р	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L/G L	L/G L		L	L/G L	L/G L	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	L	n/a	n/a
EQIA																								
Short Term	?	?	+	n/a	+	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a							
Medium Term	?/+	?/+	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a							
Long Term	+	+	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a							
Direct / Indirect	I/D	I/D	I/D	n/a	D	D	I/D	I/D	I/D	I/D	ı	n/a	n/a	ı	n/a		n/a							
Temporary / Permanent	T/P	T/P	T/P	n/a	Р	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a							
Local / Greater London / Wider Region / Global	L	L	L/G L	n/a	L/G L/ W	L/G L	L	L	L	L	L/G L	n/a	n/a	L	n/a		n/a							
HIA		ı	ı	1	ı			ı								<u> </u>								
Short Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I/D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		Р				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		L/G L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA		1	1																					
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: Housing	Policy: H2 Small sites

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### **Further Suggested Changes**

Policy H2 Small sites and small housing developments were restructured and presented in two separate policies H2 and H2A.

This made the distinction between the approach to small sites and the approach to small housing developments clearer and made it clearer that the small sites targets in Table 4.2 were a combination of modelled capacity and remaining windfall on other types of small sites.

#### H2 Small sites

The new H2 further clarified the small sites targets in H2 were a component of the overall borough housing targets and not in addition to them. It also clarified that the relative contribution from large and small sites in each borough may fluctuate across the target period – providing the overall 10-year borough target is met.

The policy text in H2 parts B and C was reordered and superfluous text deleted to present a clearer policy which was easier to follow.

#### H2A Small housing developments

This policy isolated all elements of the original Policy H2 that related to small housing development and the use of housing design codes to facilitate the presumption in favour of small housing developments. (These changes are addressed in a separate form for H2A).

NB. The assessments below use the IIA matrix for the old Policy H2 Small sites and small housing developments as the basis for suggesting changes to the matrix if required.

#### Panel recommendation changes

The housing targets have been reduced for most boroughs following a reduction in the small sites target recommended by the Panel of Inspectors examining the Plan.

The Panel considered that the small sites housing targets in Table 4.2 were neither justified nor deliverable and thus recommended a reduction in the small sites component of the overall targets in order for the London Plan to meet the tests of soundness. The new targets recommended by the Panel include revised small sites targets based on a modelled growth rate of 0.3% pa rather than the 1% used in the draft Plan. A growth rate of 0.3% was considered by the Panel to be the most likely to reflect the realistic output from small sites, although they accept it could be a cautious figure.

The Panel consider that without this recommended change, the Plan would be unsound and the default position could be that the current 2016 London Plan would continue to be the statutory development plan, and that plan has significantly lower housing targets (42,000 homes per year to the new proposed target of 52,000 homes pa).

The assessments below of the Panel recommendation changes focus on the reduced housing target for small housing developments. The impacts of the removal of the presumption in favour of small housing developments of between 1 and 25 homes is addressed in the IIA for Policy H2A.

Other changes include the moving of some supporting text from Policy H2A to the supporting text of Policy H2. This text was originally in H2 prior to the FSC, thus this change is considered to be non-material.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Panel recommendation changes

#### Objective 6 - Sustainable Land Use

• The reduced housing targets could mean that there are fewer developments of small brownfield sites close to sustainable forms of transport than would be the case with the higher targets. However, compared to the current published London Plan policies and housing targets there is more focus on development of small sites in sustainable locations and the housing targets will be higher. Thus, there is still a positive impact in the short, medium and long term.

No change to matrix.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

# Panel recommendation changes

#### Objective 5 - Housing Supply, Quality, Choice and Affordability

The lower housing targets could mean that there are fewer homes developed than would be the case
with the higher targets and thus there would be a smaller reduction in homelessness and
overcrowding over the Plan period. However, the housing targets will be still be higher than the
current published London Plan housing targets and thus, there is still a positive impact in the short,
medium and long term.

No change to matrix.

#### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

No Impacts.

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

#### Panel recommendation changes

#### Objective 1 – Equality and inclusion

- The lower housing targets could mean that there are fewer homes developed across London including in areas of lower housing costs than there would have been with the higher housing target.
  - The lower target may result in a continuation/increase of overcrowding in the existing housing stock or more people moving out of London (which may break up social and support networks). This may have a disproportionate impact on lower income, more vulnerable households, which are more likely to consist of people from BAME backgrounds, children, single parents mainly women, the elderly and disabled people.
  - Young people are also more likely to experience difficulties with housing costs.<sup>1</sup> Younger
     Londoners therefore may be disproportionally affected by a lower small sites housing target if

it results in fewer homes being built in lower cost areas, and thus this policy could contribute less to helping to deliver mixed and inclusive communities than it would have with a higher housing target.

 However, the housing targets will be still be higher than the current published London Plan housing targets – and above existing rates of delivery – and thus the policy will have potential positive/ uncertain impact in the short, medium and long term.

Matrix to be updated to reflect this.

# Objective 5 - Housing supply, Quality, Choice and Affordability

- The lower housing targets could mean that there are fewer homes, including potentially affordable homes, developed than would be the case with the higher targets and thus there would be a smaller reduction in homelessness and overcrowding over the Plan period.
- This change could potentially negatively affect BAME groups as they are likely to benefit from an increased supply of homes in general, and affordable homes in particular, because they are more likely to be living in poverty and/or in overcrowded housing<sup>2</sup>.
- Overcrowding is an issue that effects a range of Londoners but is more likely to affect households that include children, and single parent families (which are most commonly headed by women<sup>3</sup>), thus a lower rate of housing delivery could disproportionality affect these groups.
- This change may disproportionately impact LGBT+ youth who are more likely to be homeless than non-LGBT peers, given increased likelihood of familial rejection<sup>4</sup>.
- However, the housing targets will be still be higher than those in the current published London Plan
  and the new London Plan contains numerous policies that are designed to facilitate the supply of
  quality, affordable accommodation and increase choice within the market. Overall, there is a positive
  (+) impact in the short, medium and long term, but the long-term impact may not be as positive as
  previously considered.

The matrix is to be amended from a long term double positive impact (++) to a single positive (+/?).

<sup>&</sup>lt;sup>1</sup> In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said that they found the cost of living and working in London difficult and 41 per cent of these said that they would consider leaving London to work elsewhere <sup>2</sup> New Policy Institute. London's Poverty Profile 2015 (2011 Census)

<sup>&</sup>lt;sup>3</sup> Around 90% of lone parents (UK wide) are women (ONS 2019)

<sup>&</sup>lt;sup>4</sup> Albert Kennedy Trust https://www.theproudtrust.org/wp-content/uploads/download-manager-files/AlbertKennedy\_ResearchReport\_Youth-Homelessness.pdf

#### **H2 Small Sites**

IIA Element												IIA Obj	ectives	5									-	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1	1	<b>.</b>							1					ı						
Short Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	?/-	0	0	+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	?/-	+/?	+/?	+	n/a	n/a
Long Term						++	+		+	+	++	n/a	n/a	++	n/a	+	n/a	n/a	?/-	+	+	+	n/a	n/a
Direct / Indirect						D	I/D		ı	D	I	n/a	n/a	ı	n/a	ı	n/a	n/a	I/D	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	Р	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L/G L	L		L	L/G L	L/G L	n/a	n/a	L	n/a	L	n/a	n/a	L	L	L	L/G L	n/a	n/a
EQIA																								
Short Term	+/?	?/-	?/-	n/a	+	+	+/?	+	+	+/?	0	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	+/?	+/?	?/+	n/a	+	+	+	+	+	+/?	0	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	+/?	+	+/?	n/a	+/?	+	+	+	+	+/?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	ı	ı	ı	n/a	D	I/D	I/D	I/D	I/D	I/D	ı	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	Р	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/G L	n/a	n/a	n/a	n/a						
HIA																								
Short Term	n/a	n/a	?		+				n/a	n/a				n/a	n/a		n/a	n/a		0	n/a	n/a		n/a
Medium Term	n/a	n/a	?		+				n/a	n/a				n/a	n/a		n/a	n/a		0	n/a	n/a		n/a
Long Term	n/a	n/a	+/?		+				n/a	n/a				n/a	n/a		n/a	n/a		0	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		D				n/a	n/a				n/a	n/a		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		Р				n/a	n/a				n/a	n/a		n/a	n/a		Р	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/G L				n/a	n/a				n/a	n/a		n/a	n/a		L	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 9. 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and

Chapter: Housing	<b>Policy:</b> H2A Small sites housing developments
	(deleted)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Policy H2 Small sites and small housing developments were restructured and presented in two separate policies H2 and H2A

This made the distinction clearer between the approach to small sites and the approach to small housing developments.

#### H2A Small housing developments

This policy isolated all elements of the original Policy H2 that related to small housing development and the use of housing design codes to facilitate the presumption in favour of small housing developments.

The policy text in H2A part A and B was reordered and superfluous text deleted to present a clearer policy.

New text in H2A part C clarified that all other policies of the London Plan apply even if a development benefits from the presumption in favour of small housing development. Thus, H2 part D was rationalised to avoid repeating some (but not all) of the policy restrictions which apply to small housing developments e.g. building on Green Belt or designated industrial sites.

Linked to the clarification that small housing development needs to be consistent with other London Plan policy text that was in H2, part HA was deleted as it repeated other London Plan policies, and Policy H2 parts HB and HC were rewritten to make them clearer, moving them to H2A D 8) and H2A part E. Policy H2 part H was changed to remove the unnecessary repetition of how Policy H6 applies to major developments, and the text on providing flexibility for paying for off-site contributions was moved to supporting text to improve the clarity of the policy.

Part D1) and paragraph 4.2A.5 were modified to make clear that the presumption in favour does not apply in conservations area.

The text in policy H2 part G that provided flexibility in allowing homes above ground floor to only comply with M4(1) standard rather than M4(2) was moved to supporting text paragraph 4.2A.9. In addition, this flexibility to provide only M4(1) standard was caveated with new text so that it would only apply when stepfree access would be unfeasible.

**NB.** The assessment below uses the IIA matrix for old Policy H2 Small sites and small housing developments as the basis for suggesting changes to the matrix.

#### Panel recommendation changes

Following the Panel's recommendation this policy will be deleted and the small sites component of the housing targets reduced for most boroughs.

The removal of the policy has also led to consequential changes to text that related to Policy H2A throughout the Plan.

The impacts of the reduction in the small sites component of the overall housing target are assessed in the IIA for Policy H2. The assessment below focusses on the impacts of the removal of the presumption in favour of small housing developments of between 1 and 25 homes and the other elements of the policy i.e. the requirement in Part B to prepare area-wide design codes, and the encouragement in Part F to apply a tariff-based approach to affordable housing development of nine homes or fewer.

There is not a separate matrix for this policy as it will not be in the final plan.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 21 - Heritage

• Changing the policy to make clear that the presumption in favour of small housing developments does not apply in conservations area will support the conservation of heritage assets and their setting. The matrix has been changed for this objective to a positive (+) short and medium term impact.

# Panel recommendation changes

#### **Objective 6 - Sustainable Land Use**

• The removal of the policy presumption in favour of small housing developments of between 1 and 25 homes could mean that there are fewer developments of small brownfield sites close to sustainable forms of transport than would be the case if the policy was retained. Thus, this change would reduce the positive impact of the Plan on this objective.

#### Objective 7 – Design

• The removal of this policy removes the requirement in Part B to prepare area-wide design codes for small housing developments, which would help ensure new buildings are appropriately designed. However, design codes for small sites are still encouraged in Policy H2 and the supporting text from Policy H2A on design codes has been moved into Policy H2, thus the impact of this change is considered to be neutral.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No

#### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes – disability, age, and pregnancy & maternity.

b. If yes, summarise the impact on the protected characteristic(s).

# Objective 5 – Housing Supply, Quality, Choice and Affordability

The change to text in paragraph 4.2A.9 which means small housing development dwellings above or below the ground floor being allowed to comply with M4(1) standards only where step-free access would be unfeasible, is likely to result in more homes providing step-free access and the accessible housing standards of M4(2) and M4(3). This change thus promotes accessible housing and improves choice for people who require it by increasing the proportion of new build housing which meets the standards required by Policy D5. Disabled people and older people are more likely to require or benefit from access to step-free homes (whether as residents or visiting others), and thus this change represents a positive impact for these groups. Similarly step-free access is of benefit for those with very young children, for example the provision of step-free access can assist when using a pushchair or pram. Although this change will positively impact in the

short, medium and long term compared to previous text, the text still allows some homes to meet M(4)1 standards i.e. those where the provision of step-free access would be unfeasible, which represents a potential negative impact of the policy (not the FSC) on the people discussed above. The matrix already indicated that the policy will have a positive (+) impact on this objective in the short and medium term and it is considered that this change does not merit an amendment to the matrix to indicate that it will be even more positive (++).

No change to the matrix.

# Panel recommendation changes

# Objective 1 - Equality and inclusion

Intensification of existing housing areas via the presumption in favour of small housing developments of between 1 and 25 homes could have been of benefit to older people and people with young families in particular as it could have allowed them to find a home more suitable for their needs (either directly or indirectly, by providing opportunities for movement in the existing stock and through increasing the range of properties available at different price points) while remaining in their current community, thereby maintaining existing support and social networks. The removal of this policy could lead to a lessening of the Plan's potential positive impact for these groups, although there is still the general encouragement of small sites development in Policy H2.

#### Objective 5 - Housing supply, Quality, Choice and Affordability

The delivery of small sites and the intensification of existing housing areas prompted by the presumption in favour of small housing developments of between 1 and 25 homes could have been of benefit to disabled people, as it could have allowed disabled people who require accessible housing to find a home that suits their requirements while remaining in their current community, thereby maintaining existing support and social networks. Thus the removal of this policy means this positive impact could be reduced, although there is still the more general encouragement of small sites development in Policy H2.

The removal of the policy encouragement in Part F for boroughs to apply a tariffed-based approach to affordable housing requirements on small housing developments of nine homes or fewer could lead to a reduction in affordable housing. This could negatively affect BAME groups, because they are more likely to be in poverty and/or in overcrowded housing and thus in need of affordable housing. However, the supporting text related to encouraging such a tariffed-based approach to affordable housing requirements has been moved into Policy H2 and thus the impact of this change is considered to be uncertain.

Chapter: 4 Housing	Policy: H3 Monitoring housing targets

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The detail on how housing delivery will be monitored previously set out in Policy H3 has been incorporated into the supporting text of Policy H1 Increasing housing supply and thus this is considered a non-material change.

The IIA for Policy H1 assesses the impact of any changes to the monitoring text from Policy H3 that have been incorporated Policy H1, and thus there is not a separate assessment of these changes for Policy H3.

Chapter: 4 Housing	<b>Policy:</b> H6 Threshold approach to applications (Policy
	H5)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

- **Footnote 46A -** updated policy title of H2A. Update only non-material change.
- **Addition of 4.6.4** to be clear that the threshold update could be done via a focused review of the Plan. This is something that could always be done through a focused review and thus the addition of the text is just for clarity non-material change.
- **4.4.6** addition of floorspace to use consistent terminology across the Plan. Clarification that the 50 per cent affordable housing requirement for industrial land is in order to follow the fast track route. This was the intention of the original text.
- Addition of footnote 46E this footnote clarifies the approach applied to industrial land and what constitutes no net loss (this is consistent with existing text 6.4.5 of the draft Plan). It also clarifies that the approach applies to infrastructure or transport functions that are no longer required regardless of the provision of paragraph 6.4.5A. However, the new text recognises that some surplus utilities are subject to substantial decontamination, enabling and remediation costs, and if it is robustly demonstrated that these extraordinary costs must be incurred to bring the site forward, then a 35 percent threshold could be applied, subject to the requisite evidence being provided. This is providing clarity following the amends made in the MSC that introduced the potential for industrial sites to follow the 35 per cent fast track route where there is no net loss of industrial floor space capacity.
- 4.6.14 update of title of H10 non-material change.

#### Panel recommendation changes

Following the Panel's recommendation to delete Policy H2A Small housing developments there will be no definition in the Plan of small housing development which applied to developments of 1-25 units and no specific policy presumption in favour of these developments. Therefore, the following section of Policy H6 have been removed from the Plan:

- Parts of Policy H6 Parts C 1 and C 2, and associated footnotes
- paragraph 4.6.8A and 4.6.8.B

These sections of Policy H6 allowed boroughs a greater degree of flexibility in applying the criteria of the Fast Track Route to small housing developments. This flexibility included allowing affordable housing to be provided off-site or as an in-lieu payment, as well as allowing a single affordable housing tenure.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 11 Infrastructure

The footnote provides clarity in terms of specific surplus utility sites, where they have extraordinary costs. This clarity ensures the process and requirements are clear and thus should enable surplus sites to come forward. This is likely to have a positive impact in the short, medium and longer term. No change to the matrix required.

#### Panel recommendation changes

No impacts.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impact

## Panel recommendation changes

No impacts

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact

#### Panel recommendation changes

No impacts

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics? No impact

#### Panel recommendation changes

Yes

#### b. If yes, summarise the impact on the protected characteristic(s).

#### Panel recommendation changes

The removal of the flexibility for applying the criteria of the Fast Track Route to small housing developments may reduce the amount of affordable housing provided in developments of this size that would have been delivered by allowing single tenure affordable housing, or off-site or as an in-lieu payment. This change could potentially negatively affect BAME groups as they are likely to benefit from an increased supply of affordable homes due to an increased likelihood of living in poverty and/or overcrowded housing<sup>1</sup>. However, affordable housing provided through off-site delivery and in-lieu payments risks delivery as it depends on the availability of suitable sites, which may not materialise. In addition, the policy flexibility was dependent on boroughs operating it and thus it is uncertain how much additional affordable housing it would have facilitated. As such it is considered that the outcome of this change is largely unknown.

- no change to the matrix.

<sup>1</sup> New Policy Institute. London's Poverty Profile 2015 (2011 Census)

Chapter: 4 Housing Policy: H7 Affordable Housing Tenure

#### 1. Initial assessment:

- a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy
  - Additional text to Policy H7B to clarify that the Fast Track route is available for applicants that elect to provide low-cost rented homes in place of intermediate homes provided the relevant threshold is reached. This is to ensure that the tenure split requirements set out H7A are not a disincentive to applicants who wish to bring forward more low-cost rent. This is a positive clarification and reflects decisions being made on schemes already coming through the system.
  - **Footnote 49** removal of 'draft' from title of the housing strategy. Factual update, no material change.
  - **Addition of text at 4.7.8** amended for clarity, points to the GLA website for rent setting guidance for London Living Rent. No material change.
- 2. SEA (Strategic Environmental Assessment)
- 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No impact.

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

## Objective 5 Housing Supply, Quality, Choice and Affordability

This additional text may lead to an increase in low-cost rent, which could be positive in terms of reducing homelessness and overcrowding. This is likely to have a positive impact in the short, medium and longer term. No change to the matrix.

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact.

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?

Generally, the amendment will strengthen the positive impacts of the policy.

b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 1 Equality and inclusion and social integration

As Appendix 3 discusses, there a number of people who would come under a protected characteristic who are disproportionately affected by the lack of low-cost rented properties (such as women and some BAME groups). Explicitly setting out that schemes that provide low-cost rent in place of the 30% intermediate can still follow the Fast Track Route, may increase the amount of low-cost rent being delivered and this could be beneficial for those who are disproportionally impacted by the lack of low-cost rented accommodation and therefore reduce poverty and social exclusion in the short, medium and long term. These objectives already score positively in the matrix for the short, medium and long term. No changes to the matrix.

# Objective 5 Housing supply, quality, choice and affordability

The amendment may lead to more low-cost rented units being delivered, which may help those who are disproportionately affected by the lack of low-cost rented properties (such as women and some BAME groups). This objective already scores positively in the matrix for the short, medium and long term.

Chapter: 4 Housing	<b>Policy:</b> H9 Vacant Building Credit (deleted)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Removal of Part B 3 'the site is not protected for an alternative use'. This was removed as it was considered to be superfluous as the land use of the site would be considered as part of an application and is not related to the application of the Vacant Building Credit (VBC) (i.e. if the site was protected for a different land use, then that would be weighed up in the consideration of whether the proposed housing use is appropriate or not). Therefore, this amendment had no material impact on the operation of the Policy.

## Panel recommendation changes

The Panel have recommended the removal of this Policy. The report (para 236) recognises the acute need for affordable housing in London and that the potential impact of the VBC is significant, however concludes that this is likely to apply to most large urban areas.

The Panel considered there to be insufficient evidence of the impact of disapplication of VBC across London (as a whole) to justify the departure from national policy. It was noted that the option to disapply VBC based upon local evidence remained available to the boroughs, with some already having already taken this route.

There is now no separate matrix for this policy as it will not be in the final plan.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No impact

Panel recommendation changes

No impact

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impact

#### Panel recommendation changes

#### Objective 5 - Housing Supply, Quality, Choice and Affordability

The removal of this policy could result in VBC being applied to a greater number of development schemes across London, reducing the overall supply of much needed affordable housing and resulting in a lower reduction in homelessness and overcrowding during the Plan period than might otherwise have been achieved. This would result in a negative impact in the short, medium and long term.

However, these impacts can be mitigated if boroughs opt to introduce Development Plan policies based on local evidence that limit the application of VBC, as has already been the case in some boroughs. Also, the strong affordable housing policies in the Plan including the threshold approach, may limit the negative impact of the removal of this policy. The outcome of removing this policy on this objective is unknown.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact

#### Panel recommendation changes

No impact

#### 5. EqIA - Equality Impact Assessment

## a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic
Disability
Age
Sex
Race
Religion
Sexual orientation
Gender reassignment
Marriage & civil partnership
Pregnancy & maternity

No

#### Panel recommendation changes

Yes

# b. If yes, summarise the impact on the protected characteristic(s).

#### Panel recommendation changes

#### Objective 5 - Housing supply, Quality, Choice and Affordability

The removal of this policy could result in VBC being applied to a greater number of development schemes across London, reducing the overall supply of much needed affordable housing and resulting in a lower reduction in homelessness and overcrowding during the Plan period than might otherwise have been achieved. This change could potentially negatively affect:

- BAME groups as they are likely to benefit from an increased supply of affordable homes due to an increased likelihood of living in poverty and/or overcrowded housing<sup>1</sup>.
- Households that include children and single parent families (most commonly headed by women<sup>2</sup>)
  who are more likely to be impacted by issues of overcrowding.
- LGBT+ youth who are more likely to be homeless than non-LGBT peers, given increased likelihood of familial rejection<sup>3</sup>.

These impacts may be mitigated if boroughs opt to introduce Development Plan policies, based on local evidence, that limit the application of VBC, as has already been the case in some boroughs. Moreover, the new London Plan plans for significantly increased housing targets from the current London Plan, comprising numerous policies that are designed to facilitate the supply of quality, affordable accommodation. This includes policy that incentivises applicants to reach a minimum affordable housing threshold to reduce the length of the application process and allow access to grant funding (i.e. the Fast Track Route). As schemes claiming VBC are exempted from this route, this considerably lessens the likelihood of its application.

An improvement in housing supply through the broader policy framework could still result in a net positive impact upon affordable housing delivery, even if VBC is utilised in some instances. Additionally, borough plans to limit its application locally remain unknown. As such, although the removal of this policy could lead to a negative impact in the short, medium and long term it is considered that the outcome of this change is largely unknown.

- <sup>1</sup> New Policy Institute. London's Poverty Profile 2015 (2011 Census)
- <sup>2</sup> Around 90% of lone parents (UK wide) are women (ONS 2019)
- <sup>3</sup> Albert Kennedy Trust https://www.theproudtrust.org/wp-content/uploads/download-manager-files/AlbertKennedy\_ResearchReport\_Youth-Homelessness.pdf

Chapter: Chapter 4	Policy: H10 Loss of existing housing and estate
	redevelopment (Policy H8) (previously Redevelopment
	of existing housing and estate regeneration).

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

A number of changes have been suggested to this Policy to address the discussion at the EiP that suggested that the intention of the Policy was not sufficiently clear;

- Title amended for clarity
- Addition of part AB to set out clearly in the Plan that demolition and replacement should only be considered once alternative options have been considered. This is consistent with the Mayor's Good Practice Guide. This provides clarity and clearly articulates the Mayor's approach in the Plan.
- Amendments to part B to provide absolute clarity about what should be replaced and what with. This does not amend the intention of the previous drafting but provides further clarity. No material impact.
- Part BA amendment is a clarification all schemes that result in a loss of affordable housing should follow the viability tested route. This was the intention of the original drafting, but discussion at the EiP suggested this wasn't sufficiently clear. No material impact.
- Paragraphs 4.10.1, 4.10.3, 4.10.3A and 4.10.3B provide further clarity on the importance of existing housing and housing intensification, providing supporting text to the addition of AB. The new text makes the importance of resident consultation clear and that all the different options are considered.
- Paragraph 4.10.4 supporting text to clarity provided in part BA about the need to seek to provide an uplift in affordable housing and that all schemes must follow the viability tested route. No material impact as it simply clarifies the approach set out in the draft Plan.
- Paragraph 4.10.5 provides clarity that the approach discussed in this paragraph can be applied to affordable housing providers (rather than just boroughs) but only where the borough supports the approach (and the Mayor where relevant). No material impact.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

#### Objective 6 – Sustainable land use.

• The updated policy makes it clear that before considering demolition and rebuild, alternative options should be considered first and that the potential benefits of demolition and rebuilding homes should be balanced against the wider social and environmental impacts. This is consistent with the Mayor's Good Practice Guide to regeneration, which has been in place since February 2018. This aims to ensure that the benefits of redevelopment, including delivering more homes (and more affordable homes), are weighed up against the other impacts of that approach. It also ensures that all the options for making the best use of land are considered. These changes are likely to have a positive impact in the short, medium and longer term. No update to the matrix required

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 5 - Housing Supply, Quality, Choice and Affordability.

• The Policy scored positively originally on objective 5. The updates provide more clarity in terms of considering other options before redevelopment and rebuild (which was an expectation already set out in the Good Practice Guide) and requires the balancing of the benefits and impacts of such an approach. They also make it clearer that all redevelopment schemes must go down the viability tested route to ensure the maximum level of affordable housing is delivered. Both of these

amendments are considered to be positive in short, medium and longer term. No changes to the matrix.

• The Policy also sets out clearly, that existing social rented homes should be replaced with social rented homes where tenants have the right to return. Where there is no right to return, existing homes can be replaced with London Affordable Rent homes. This sets out the intention of the MSC footnote text more explicitly. It has also been moved from a footnote into the main Policy text, but this is simply presentational. Overall, this clarity is likely to have positive impacts in the short, medium and longer term. No changes to the matrix.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic
Disability
Age
Sex
Race
Religion
Sexual orientation
Gender reassignment
Marriage & civil partnership
Pregnancy & maternity

# b. If yes, summarise the impact on the protected characteristic(s).

#### Objectives 1 Equality and inclusion and 2 Social integration

The amendments make it clear that alternatives to demolition and rebuild should be considered first and the potential benefits of demolition and rebuild should be balanced against the social and environmental impacts. The Policy also sets out the importance of resident consultation. There are a number of social issues that should be considered in relation to the loss of existing housing and estate redevelopment. These include understanding who will be impacted by redevelopment and also who will benefit from the provision of new homes. As set out in Appendix 3 of the Mayor's response to Panel note 7.2, people with some protected characteristic are more likely to live in social housing (such as women, people with some BAME backgrounds and people with some religious beliefs). People with some protected characteristics are also more likely to rely on and be part of local community and family networks that could be affected by the disruption of estate redevelopment and/or feel the disruption more acutely (such as older people, families with young children and people with a disability). In explicitly setting out that social impacts must be considered, the amendments to the Policy will help ensure that the impacts of redevelopment (including potential (temporary) relocation of residents) are considered as part of balancing the negatives and benefits of the different options. This balancing includes understanding the benefits of better-quality new homes and more affordable homes, which are likely to be of particular benefit to the those with protected characteristics who are most likely to occupy social housing and/or most impacted by estate regeneration. This is a positive addition to the Policy. However, it does not remove the potential for negative impacts on people with some protected characteristics (as previously highlighted) and thus no change is suggested to the matrix.

- As identified in Appendix 3 of the Mayor's response to Panel note 7.2, the earlier drafting of the Plan referenced the Good Practice Guide that sets out that alternative options to demolition should always be considered before demolition. Following discussion at the EiP and concerns raised by participants, this has now been explicitly set out in the Plan itself. This ensures this principle applies to all estate regeneration schemes.
- Including text explicitly about ensuring resident involvement supports the objectives of equality and inclusion and social integration, by promoting opportunities for Londoners to actively participate in the city's life and decision-making and communities. Again, this is already covered by the Mayor's Good Practice Guide. But following discussion at the EiP, where participants felt that the need for resident involvement should be explicitly set out in the Plan in order to ensure adherence to this approach, it has now been added to the Plan.

#### Objective 3 Health and health inequalities

As discussed above, the inclusion of text in part AB helps ensure the benefits and social and
environmental impacts of demolition and rebuild are considered, including taking account of the
impacts of relocation of existing residents. This, along with the guidance around mitigating impacts
in the Good Practice Guide and the benefits of better-quality, more efficient homes and more
affordable homes generally, could help to reduce inequalities in physical and mental health and
wellbeing in the long term. The short to medium term impacts of relocation would be taken into
account in the balancing exercise now set out in AB. While this is a positive change, no updates to
the matrix are required.

#### Objective 5 Housing supply, quality, choice and affordability

- Unlike previous plans, the Plan does not promote estate redevelopment as a specific source of housing supply. However, in some cases, it will be an option to be considered. As part of the consideration of options, the potential for a regeneration scheme to deliver additional housing and, in particular, an uplift in affordable housing, and the tenure of the affordable housing, would be taken into account. As discussed in Appendix 3 and the Mayor's response to Panel note 7.2, people with some protected characteristics (such as women, who are much more likely to be single parents a group disproportionately likely to experience poverty) are more likely to be in need of, and therefore to benefit from, new affordable homes. However, at the same time, those groups are also more likely to be impacted by the disruption of estate regeneration. The new text in part AB ensures that these benefits and impacts are considered when assessing any options for estate regeneration.
- New homes delivered need to meet the other requirements of the Plan, including the policies in the
  design chapter that stipulate quality and accessibility standards. Increasing the stock of accessible
  homes can be beneficial and increase the level of choice in terms of housing that meets the needs of
  disabled Londoners, older people and families with young children. Again, this benefit of delivering
  new homes would need to be considered when appraising the options for estate regeneration.

These changes are likely to be positive in the short, medium and longer term. No change to the matrix.

All such schemes should be viability tested and should seek to ensure that an uplift in affordable housing is delivered where possible (as well as replacing existing affordable homes on an equivalent basis). This should deliver more affordable homes and potentially a greater mix of affordable homes, in line with this objective. However, as this amendment does not change the intention of the Policy and approach, but simply clarifies it, it is not considered to change the impact of the Policy.

#### Objective 6 - Sustainable land use.

• The additions to the Policy and supporting text seek to ensure that the benefits of redevelopment and the social and environmental impacts are considered. This helps meet this objective by making the best use of land and ensuring sustainable development, taking account of the impacts on existing and future residents. This includes taking account of the impact of demolition and rebuilding

on existing communities. As set out in Appendix 3 and the Mayor's response to Panel note 7.2, people with some protected characteristics are more likely to need and/or to live in social housing, such as women, people with some BAME backgrounds and people with some religious beliefs. Those with some characteristics are also more likely to be part of and rely on local community and family networks that could be affected by the disruption of estate redevelopment, or to feel the disruption more acutely. These include older people, families with young children and people with disabilities. No change to the matrix

## Objective 7- design

 Setting out explicitly that other options are to be considered before demolition and redevelopment, and that the social and environmental impacts of demolition and rebuild are to be balanced against the benefits supports the delivery of objective 7, including retaining the spatial diversity of communities. The policy already scores positively (in the medium and long term) on this objective, so no change necessary.

# Objective 10 – Economic competitiveness and employment

• This objective is about supporting working families and minimising barriers to employment. Single parent families are more likely to live in social housing and single parents more likely to be women (see Appendix 3 – Mayor's response to Panel note 7.2). Also, women are more likely to have unpaid caring responsibilities for an elderly relative. A relocation (even temporary) could make it harder for women in these situations to retain a job as they may rely on local support networks for childcare, or have a job that allows them to care for their children or other relatives by being close to where they live, close to schools and or accessible by walking or public transport. This should be taken into account when considering the option of demolition and rebuild and the social and environmental impacts as required by the new Part AB. Matrix amended to include a question mark in objective ten and d/i, t/p and local.

Chapter: 4 Housing	<b>Policy:</b> H12 Housing Size Mix (Policy H10)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

A number of changes have been suggested to Policy H12 and its supporting text. Some changes were suggested in the Mayor's matters statement and these were debated at the EiP. Further changes were suggested post EiP session to address some of the issues raised by participants.

- A 1) provides clarity by setting out that, where robust local evidence of need is available, this should be taken into account to inform the unit size mix (in terms of numbers of bedrooms) of a scheme. Where it is not available, the London-wide SHMA should be used.
- 1 A) provides clarity by explicitly mentioning the Local Housing Register as a source of information about local housing need.
- Paragraph 4.12.1 text updated to:
  - Refer to the three housing size mix scenarios (these are discussed in the Mayor's written statement – the different scenarios are based on different assumptions about the level of under occupation in the stock at the end of the SHMA period). All three scenarios will be included in an addendum to the SHMA.
  - Ensure it is clear in the text that assumptions about under-occupation is one of the factors that impact the housing size mix.
  - o Make it clear that the SHMA scenarios can be drawn on to inform local assessments.
  - Clarify that the SHMA provides information for the full period, and that boroughs may wish
    to prioritise to meet the most urgent need, which may mean prioritising low-cost rented units
    of particular sizes (particularly to address current issues of overcrowding).
- Paragraph 4.12.2 The new text included in this paragraph sets out that boroughs may set a preferred size mix for all tenures as part of a site allocation, ensuring that the mix is determined in accordance with Parts A and D of the Policy.
- Table 4.3 deleted.
- Paragraph 4.12.6 simple clarification including reference to the SHMA and factual update from affordable to low-cost rent.

#### **Panel Recommendations**

• Removal of part C of the Policy and related supporting text as recommended by the Panel report.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

The suggested changes are assessed to have no consequence for the SEA assessment.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

# **Objective 5** Housing Supply, Quality, Choice and Affordability

Explicitly setting out in para 4.12.1 that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes, could help boroughs reduce overcrowding and homelessness (assuming moves from overcrowded accommodation lead to a vacated low-cost rented unit that can be reallocated. This is likely to have a positive impact in the short, medium and longer term. No change to the matrix.

## 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

The suggested changes are assessed to have no consequence for the CSIA assessment.

# 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic
Disability
Age
Sex
Race
Religion
Sexual orientation
Gender reassignment
Marriage & civil partnership
Pregnancy & maternity

#### b. If yes, summarise the impact on the protected characteristic(s).

# Objective 5 Housing supply, quality, choice and affordability

The changes to this Policy are, in the main, clarifications about how different information can be used to inform the size of housing (in terms of numbers of bedrooms). The suggested changes to A 1) make it clear that where robust local evidence exists, applicants and decision makers should have regard to this. This complements Part D that already sets out that local evidence should be taken into account in terms of meeting identified need for low-cost rent. As low-cost rent is the only tenure that is allocated on a needs basis (and on a borough boundary basis), it is generally here that ensuring identified need is catered for can make the most impact. While it is important that a range of market homes are built, the options for all households in market and intermediate housing are constrained by the number of bedrooms required and the affordability of meeting that need in different locations. Additionally, different households have different preferences regarding locational characteristics such as access to transport, services and other amenities. Accordingly, the amendment to H12 A and 4.12.2 is assessed to not impact the original assessment.

As discussed in Appendix 3 of the Mayor's response to the Panel note 7.2, there are some groups which would come under one or more protected characteristics that are disproportionately affected by the lack of low-cost rented accommodation and it is important that those needs are understood when setting size mix requirements for low-cost rent. Being clear that the housing register is a source for such information helps ensure that this information is taken into account. This clarification does not lead to a change in the original assessment.

#### **Panel Recommendations**

The removal of H12 part C, as part of the Panel recommendation, means that boroughs can set area-wide size mix requirements for intermediate and market homes (as well as low cost rent, which the draft Plan already permitted). This will make it easier for boroughs to stipulate the mix of homes (in terms of bedrooms) that should be delivered in the borough. In theory, this could help deliver homes that meet identified need, but, as market housing is not allocated, it may not actually meet the identified need. Therefore, no update to the matrix required.

Chapter: 4 Housing	Policy: H13 Build to Rent (Policy H11)

a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy (e.g. restructuring, clarification, strengthened policy on x)

Two amendments have been made to this section;

- Paragraph 4.13.9A was added to provide clarity that boroughs can require social rent as part of the tenure mix for build to rent schemes, but this needs to be justified at the local level through the plan-led process.
- Amendment to part B 5) to be clear that unified management and ownership is relevant for the private and DMR elements of the scheme, accepting that any low cost rented accommodation would need to be managed by a registered provider and thus may be a different provider to the market and DMR element.
- 2. SEA (Strategic Environmental Assessment)
- 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No impact.

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 5 Housing Supply, Quality, Choice and Affordability

This amendment could lead to increased numbers of low-cost rented homes and thus be positive for objective 5, however, it could also lead to less affordable housing on a scheme overall and/or be a disincentive to bringing forward Build to Rent developments. As such the amendments do not impact the scoring.

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact.

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics? Yes
- b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 5. Housing supply, quality, choice and affordability

As discussed in Appendix 3 the Mayor's response to Panel note 7.2, there are a number of groups of people who would come under one or more protected characteristic who are in particular need of low-cost rented accommodation and an increase in this type of accommodation could be beneficial for these groups. However, the policy does not require low-cost rent; rather it allows boroughs to put in place a policy to require it, thus, while it is potentially a positive clarification, it does not necessarily lead to a change in scoring in the matrix.

Chapter: 4 Housing	Policy: H14 Supported and specialist accommodation
	(Policy H12)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Additional supporting text provided in the form of paragraph 4.14.2 explains that supported and specialised accommodation (the subject of this policy) can include accommodation that incorporates support for a particular group, sometimes until they are ready to move on. It also explains that this could potentially be in a hostel setting and is likely to include some communal facilities but does not include visitor accommodation.

This additional supporting text provides additional guidance and therefore clarity as to the type of accommodation that is covered by Policy H14, and clarifies that the policy does not apply to visitor accommodation, which is covered by other policies in the plan.

#### **Changes following panel recommendations**

In line with the Panel recommendation, the first sentence of paragraph 4.14.1will be inserted into the policy (clause A) to elevate the supporting text in question to a policy requirement for boroughs to undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation with their borough.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No.

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 5 Housing supply, quality, choice and affordability

The additional clarification provided by the FSC and additional supporting text in 4.14.2 will assist boroughs, ensuring more comprehensive and accurate assessments for the different forms of supported and specialist accommodation are undertaken which in turn can support delivery. Impacts already reflected in matrix scoring - no change.

## Panel recommendation changes

#### Objective 5 Housing supply, quality, choice and affordability

The additional policy requirement in response to the inspectors' recommendation, may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. The could present additional positive impacts for people who require supported and specialised accommodation, positively impacting on housing supply, quality, choice and relevance for them. Impacts already reflected in matrix scoring- no change.

#### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Nο

#### 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

#### Panel recommendation changes

#### Objective 1 Equality and inclusion

The additional policy requirement in the form of alterations in response to the inspectors' recommendation, may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. Thus, the change could present additional positive impacts for people who require supported and specialised accommodation, including disabled people who require additional support or for whom living independently is not possible, people with mental health issues who require additional support, and accommodation for victims of violence against women and girls. Potentially working to advance equality of opportunity in terms of suitable accommodation between those who share certain protected characteristics and those who do not. In addition, given the policy requirement for this type of accommodation within a wider inclusive community setting, additional opportunities for Londoners of every background to connect may also result from the policy change.

Impacts already reflected in matrix scoring- no change.

## **Objective 2 Social integration**

The additional policy requirement in the form of alterations in response to the inspectors' recommendation, may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. Thus, the change could present additional positive impacts for people who require supported and specialised accommodation, including disabled people who require additional support or for whom living independently is not possible, people with mental health issues who require additional support, and accommodation for victims of violence against women and girls. This could potentially advance equality of opportunity in terms of suitable accommodation between those who share certain protected characteristics and those who do not. In addition, given the policy requirement for this type of accommodation within a wider inclusive community setting, additional opportunities for Londoners of every background to connect may also result from the policy change, which could impact on disabled people in particular, who are more likely to experience social isolation such as BAME Londoners aged 20-24 years, disabled and older Londoners, and men, helping to ensure that London has socially integrated communities.

Impacts already reflected in matrix scoring- no change.

#### Objective 3 Health and health inequalities

The additional policy requirement in the form of alterations in response to the inspectors' recommendation, may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. Thus the change could present additional positive impacts for people who require supported and specialised accommodation, including disabled people who require additional support or for whom living independently is not possible, people with mental health issues who require additional support, and accommodation for victims of violence against women and girls. This could potentially help to improve the mental and physical health and wellbeing of Londoners given that for many people, living in unsuitable accommodation can have a significant impact on health and wellbeing. Impacts already reflected in matrix scoring - no change.

# Objective 5 Housing supply, quality, choice and affordability

The additional policy requirement in the form of alterations in response to the inspectors' recommendation, may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. Helping to facilitate the delivery of accommodation that meets the

<sup>&</sup>lt;sup>1</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

needs of Londoners, and improving choice for Londoners. Thus the change could present additional positive impacts for people who require supported and specialised accommodation, including disabled people who require additional support or for whom living independently is not possible, people with mental health issues who require additional support, and accommodation for victims of violence against women and girls. The policy change could, if it leads to an increase in accommodation in accordance with Policy H14 being provided.

Impacts already reflected in matrix scoring- no change.

#### **Objective 7 Design**

The additional policy requirement in the form of alterations in response to the inspectors' recommendation, may result in additional opportunities for Londoners of every background to connect, given the policy requirement for this type of accommodation within a wider inclusive community setting, which could impact on disabled people in particular, who are more likely to experience social isolation such as BAME Londoners aged 20–24 years, disabled and older Londoners, and men.<sup>2</sup> The alteration may result in more boroughs undertaking an assessment of need for supported and specialised accommodation and this may result in additional provision, or accommodation more reflective of or better matched to need within the borough. Combined with other Plan policy requirements in terms of inclusive design, this could represent additional opportunities for the creation of, or contribution towards the creation of attractive, mixed-use neighbourhoods, which promote social integration.

Impacts already reflected in matrix scoring- no change.

<sup>&</sup>lt;sup>2</sup> GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

#### H14 Supported and specialised accommodation

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
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Short Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	n/a	n/a
Medium Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	n/a	n/a
Long Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	n/a	n/a
Direct / Indirect						I	I		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	ı	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L/G L	L/G		n/a	n/a	L/G	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA	<u> </u>								<u> </u>	<u> </u>							<u> </u>			<u> </u>				
Short Term									l .	l .			l .				l .	l .						Τ.
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Medium Term	++	++	++	?	++	?	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	++	?	++	?	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	ı	ı	D	ı	ı	ı	n/a	n/a	ı	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	Р	T/P	T/P	Т	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G I	L/G L	L	L/G L	L/G I	L/G I	L/G L	n/a	n/a	L/G I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA									<u> </u>	<u> </u>							<u> </u>						_	_
Short Term	+	+	?		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+/?		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+/?		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	ı	ı	ı		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		Р				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L/G L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
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Short Term				n/a					n/a															
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Local / Greater London / Wider Region / Global				n/a					n/a															

#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 4 Housing	<b>Policy:</b> H15 Specialist older persons housing (Policy
	H13)

NLP/TP/01 Specialist older persons housing (Mayor of London, Nov 2017) highlighted that:

"1.2 It is essential that the London Plan ensures the provision of accommodation suitable to meet the needs of older Londoners."

Much of the focus of the topic paper was on where specialist older persons housing sits within the use class order. However, it also highlighted the importance of specialist older persons housing providing accessible housing via the optional accessible housing standards contained in Part M vol 1 of the Building Regulations and the relationship between planning policy requirements and the building regulations definitions to which the standards can apply.

To create as much choice as possible for older people wishing to move into specialist older persons housing, and to future proof the housing that older people may\* chose to move into - ensuring it will remain suitable for their needs and can accommodate adaptations in the future if needed - it is essential that the London Plan policy results in specialist older persons housing which is accessible and adaptable, or meets wheelchair user dwelling standard.

\*Research undertaken for the GLA in 2017 found that around 15% of older households are expected to want to move into specialist older persons housing.<sup>1</sup>

The approach of ensuring that specialist older persons housing is provided for Londoners which is suitable and provides options of affordable and accessible housing for these Londoners has been maintained throughout the development of this policy.

The Mayor's matters statement (Mayor of London M31 Specialist older persons housing<sup>2</sup>) highlighted how legislative considerations in the form of s.149 of the Equality Act could apply in the case of this policy in relation to the GLA as a public authority:

"31.4 Section 149 of the Equality Act 2010 places duties on public authorities, in their exercising of functions, to have 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. 'Age' is one of the protected characteristics. The Plan should therefore ensure that older people accessing specialist older persons/age restricted housing have the same chance of being able to access affordable housing as people who do not share that protected characteristic."

Specific requirements within Policy H15 include:

- consideration of the need for sites to be well served by public transport (H15 A2).
- for accessible housing (H15 B2).
- the highest standards of accessible and inclusive design (H15 B3).
- suitable levels of safe storage and charging facilities for residents' mobility scooters (H15 B4), and pick up and drop off facilities for taxis, minibuses and ambulances (H15 B5).
- the provision of affordable housing in a specialist older persons housing setting.

All of this will be of benefit to people who would come under the protected characteristics of disability and/ or age (older) (which are often interrelated given the prevalence of disability increases significantly with age<sup>3</sup>). Policy H15 therefore aims to ensure that older people who choose to seek tailored specialist accommodation have a greater level of choice in terms of accommodation which meets their needs if they are reflective of the above listed design features.

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part A1) of the policy amended:

<sup>1</sup> NLP/HOU/023: Three Dragons, Older persons housing benchmarks: assessing future potential demand for older persons housing, care homes and dementia housing in London, November 2017, Page 3

<sup>&</sup>lt;sup>2</sup> https://www.london.gov.uk/sites/default/files/mayor\_of\_london\_-\_m31\_specialist\_older\_persons\_housinq.pdf

<sup>&</sup>lt;sup>3</sup> Office for national statistics. Dataset: Measuring disability. 06 August 2019.

# 1) local and strategic housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.4.

These changes provide additional clarity as to the housing needs information which should be taken into account when identifying sites which may be suitable for specialist older persons housing. The removal of the reference to strategic housing needs information provides additional clarity, as the indicative benchmarks are already specifically mentioned. Additional text requires data at a local level on the type and tenure of demand to be taken into account, in addition to the indicative benchmarks set out in Table 4.4. This change could potentially result in a greater number of suitable sites being identified for specialist older persons housing. It could also result in schemes coming forward which better reflect and are tailored to meet locally defined need, the local population, and are more relevant to the locality.

Changes proposed in the Mayor of London's Matters Statement M31<sup>4</sup>, published 17<sup>th</sup> January 2019, deleted text in Parts B and C of the policy to remove reference to the use class order, as well as supporting text in paragraph 4.15.3 which defined the accommodation Policy H15 applied to. The consultation draft of the policy explained that specialist older persons housing should be considered as use class C3, and residential nursing care accommodation (which this policy does not provide requirements for) as use class C2. Following concerns being raised via the draft Plan consultation process, references to C2 and C3 were removed from the policy.

Additional text has been incorporated, resulting in Policy H15 using characteristics based on attributes set out by the Care Quality Commission's 'regulated activities' to define its scope, as opposed to the use class of the development:

- Addition of paragraph 4.15.3A which defines 'care home accommodation' via a list of attributes, and states that H15 requirements do not apply to care home accommodation.
- Addition of paragraph 4.15.3B which provides a list of attributes which define the housing which Policy H15 does applies to.
- Addition of paragraph 4.15.3C makes clear that where a development does not meet the attributes
  of 'specialist older persons housing' or 'care home accommodation' then the general housing policies
  in the Plan apply.

These additional paragraphs provide clarity for those using the policy, providing a comprehensive approach and model that can be followed in determining the policy requirements which apply to different developments.

These changes are not anticipated to result in any significant change to the number of or type of developments the policy will apply to, or the final on site provision - however they may lead to a greater level of clarity and ease of implementation of the policy given concerns raised at public consultation stage. Therefore- no changes to matrix.

The references to small sites and small housing developments in the supporting text have been updated to use the same terminology used in the updated policies H1, H2 and H2A – which represents a non-material change, again - no change to the matrix.

#### b. Changes in response to the planning inspector recommendations

Inspectors' recommendation PR15: Paragraph 14.15.3B and 14.15.3C - amend paragraphs 14.15.3B and 14.15.3C with words to the effect that the policy also applies to specialist older person's housing which does not provide an element of care.

Changes made in response to this:

Additional text inserted into 4.15.3B explaining that:

'4.15.3B Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy' and that this is in addition to housing incorporating the previously highlighted attributes in 4.15.3B i.e. specialist older persons housing where care is provided.

<sup>&</sup>lt;sup>4</sup> https://www.london.gov.uk/sites/default/files/mayor\_of\_london\_-\_m31\_specialist\_older\_persons\_housing.pdf

4.15.3B has been restructured with letters and numbers for clarity and ease of referencing and implementation.

Paragraph references also added to 4.15.3C for clarity.

Reference to H2A has been removed as this Policy has now been removed from the Plan – see section on H2A for assessment.

These alterations/ clarifications have not been deemed to represent a material change to the policy or its requirements, therefore no additional impacts have been identified as a result of them.

#### SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No

# HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No

# **CSIA (Community Safety Impact Assessment)**

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No

#### **EqIA - Equality Impact Assessment**

a. are the changes likely to have an impact on one or more protected characteristics?

Yes- age, disability, race.

b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 5 Housing supply, quality, choice and affordability

Additional text requiring data at a local level on the type and tenure of demand to be taken into account, in addition to the indicative benchmarks set out in Table 4.4 could potentially result in a greater number of suitable sites being identified for specialist older persons housing. It could also result in schemes coming forward which better reflect and are tailored to meet locally defined need, the local population, and are more relevant to the locality – potentially representing a potential positive impact for specific groups. This includes older BAME members of the community, given the evidenced low levels of home ownership within this group<sup>5</sup>, by helping ensure that the need for different tenures, including affordable specialist housing, is taken account of in the delivery of this housing. In addition, many BAME groups will specifically benefit from an increased supply of homes in general, and genuinely affordable homes in particular, because they are more likely to be in poverty and/ or in overcrowded housing<sup>6</sup>. BAME Londoners are more likely to live in households with an average annual income below £20,000 and are twice as likely to rent privately than White British people<sup>7</sup> so may be more likely to benefit from the provision of affordable housing within the specialist older persons housing offer. Disabled older Londoners may also benefit from a potential increase in provision – given the links made in Policy H15 with Policy D3 Inclusive design and D5 Accessible housing and the increase in the prevalence of disability with age<sup>8</sup>.

<sup>&</sup>lt;sup>5</sup> Shelter (2013) People living in bad housing – numbers and health impacts

<sup>&</sup>lt;sup>6</sup> New Policy Institute. London's Poverty Profile 2015 (2011 Census)

<sup>&</sup>lt;sup>7</sup> Office for National Statistics – 2011 Census

<sup>&</sup>lt;sup>8</sup> Office for national statistics. Dataset: Measuring disability. 06 August 2019.

Matrix already reflective of these impacts.

# Objective 6 Sustainable land use

The alteration to H15 A1) requiring boroughs to take account of data on the local type of demand and tenure demands is likely to result in more tailored developments which take into account and are more likely to respond to the needs of existing communities, representing potential positive impacts for older people and older disabled people who would benefit from the provision of this housing, and the accessibility features it provides.

Matrix already reflective of these impacts.

Chapter: 4 Housing	Policy: H16 Gypsy and Traveller accommodation
	(Policy H14)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Additional policy requirement to part A of the Policy which requires boroughs to include ten-year pitch targets in their Development Plan documents. This provides clarity around the fact that H16 requires boroughs to not only plan to meet need, but also to set out how much supply will be delivered over a ten-year period in their Development Plan documents. This clearer, more prescriptive guidance could potentially lead to a greater level of policy conformity and pitch delivery.

Reinserted text into part C 2 of the Policy that had been deleted at the minor suggested changes stage. This reinserted text helps clarify that the midpoint figure in table 4.4A is the need figure for pitches which boroughs should use/ plan to meet, if they do not follow the option of Policy H16 C1). Reinserted text into part C 2 of the policy also clarifies that this need figure should only be used until the borough undertakes a needs assessment as part of reviewing its Development Plan. Both of these reinsertions provide clearer guidance which should make it easier for boroughs to implement the policy - potentially leading to a greater level of policy conformity and pitch delivery.

New paragraph of supporting text: 4.16.5A. This paragraph references research work currently underway on the negotiated stopping approach in a London context. This new text makes no material change to the policy as there are no policy requirements around this type of provision in H16.

New paragraph of supporting text: 4.16.9A. This paragraph provides information for boroughs on their duties under the Housing and Planning Act 2016 in regard to considering the need for caravan sites and moorings for houseboats, stating that the requirements of H16 are in addition to duties under the Act. This new text makes no material change to the policy or its requirements - it simply highlights other non-planning duties which apply to boroughs.

Table 4.4A Need for Gypsy and Traveller pitches from London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008, midpoint need figure 2007-2017 had two rows amended:

- The midpoint need figure for Havering has been changed from 15 previously to 20.
- The midpoint need figure for Sutton has been changed from 21 previously to 11.

Both of these amendments were corrections to previous typing errors which occurred when the table was transferred from the GLA's topic paper into Policy H16. One change represents an increase in the number of pitches, one change represents a decrease. However, as these changes are correcting errors, the numbers are not considered to represent a change in pitch requirements and will not be assessed as such.

#### **Panel recommendations**

Additional paragraph (4.16.6A) added to supporting text which explains that the Mayor will initiate and lead a London-wide Gypsy and Traveller accommodation needs assessment, and until the findings of this are available for use in Development Plans, boroughs should continue to plan to meet the need for permanent Gypsy and Traveller pitches in accordance with the requirements of Policy H16, with a particular focus on part C.

To tie in with this commitment, part C of the policy has been amended accordingly, deleting text which is no longer needed and could have been confusing. The amendments to part C of the policy are unlikely to represent a change in the implementation or delivery of this policy when considered in combination with the commitment in supporting text to undertake a London-wide accommodation needs assessment.

Overall these changes are unlikely to result in any additional impacts.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No

#### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3. Health and health inequalities

Research has found that two thirds of Gypsies and Travellers reported their health as bad, very bad or poor, that the living conditions of Gypsies and Travellers significantly contribute to their physical and mental health, and that the poor health of Gypsies and Travellers is made worse by their living environment, accommodation insecurity and community discrimination (Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health, The Traveller Movement, 2016). The explicit requirement for boroughs to include a pitch target in their Development Plan Documents should lead to more pitches being delivered, which could improve the living conditions for Gypsies and Travellers and ease concerns around accommodation insecurity, potentially acting to improve the physical and mental health and wellbeing of the community. This objective already scores positively on the matrix, so no update required.

Objective 5. Housing supply, quality, choice and affordability

• The amendments which ensure boroughs have pitch targets in their Development Plan Documents will help to provide the quantum and type of housing to meet household demand. This is likely to result in additional positive impact in the medium and long term.

Matrix to be amended.

#### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

No

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, race, disability, age.

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1. Equality and inclusion

The amendments which ensure boroughs have pitch targets in their Development Plan Documents is
designed to result in more pitches being delivered to meet need, and may result in a reduction in
social exclusion and the promotion of a culture of equality, fairness and respect for Gypsies and
Travellers.

This is likely to result in an additional positive impact in the medium term. Matrix amended.

#### Objective 3. Health and health inequalities

Research has found that two thirds of Gypsies and Travellers reported their health as bad, very bad
or poor, that the living conditions of Gypsies and Travellers significantly contribute to their physical
and mental health, and that the poor health of Gypsies and Travellers is made worse by their living
environment, accommodation insecurity and community discrimination (Impact of insecure
accommodation and the living environment on Gypsies' and Travellers' health, The Traveller
Movement, 2016).

The amendments which ensure boroughs have pitch targets in their Development Plan Documents is designed to result in more pitches being delivered to meet need. An increase in the number of permanent pitches could improve the living conditions for many Gypsies and Travellers and ease concerns around accommodation insecurity, potentially acting to improve the physical and mental health and wellbeing of the community.

This is likely to result in additional positive impacts in the medium and long term. Matrix amended for medium term.

Objective 5. Housing supply, quality, choice and affordability

Gypsies and Travellers experience the under-provision of pitches across London, and concerns
around accommodation insecurity often have a significant impact on them. Ensuring boroughs have
pitch targets in their Development Plans will help to provide the quantum and type of housing
required to meet the needs of Gypsies and Travellers.

This is likely to result in additional positive impacts in the medium and long term. Matrix amended.

#### **H16 Gypsies and Travellers Accommodation**

IIA Element												IIA Obj	jectives	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA									1	1			T .	ı	Ι	Γ	Γ	ı	ı		1	1		_
Short Term						?	++		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0/?	n/a	0	n/a	n/a
Medium Term						?	++		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0/?	n/a	0	n/a	n/a
Long Term						?	++		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0/?	n/a	0	n/a	n/a
Direct / Indirect						ı	I/D		n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	ı	n/a	ı	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	Р	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Т	n/a	Р	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/G L		n/a	n/a	GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	n/a	L	n/a	n/a
EQIA																								
Short Term	++	+	+	?	++	?	++	+	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	++	++	++	?	++	?	++	+	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	++	?	++	?	++	++	n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	I/D	D	ı	ı	I/D	n/a	I/D	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	Р	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	L/G L	L	L/G L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	+	++	++		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	++	++		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	++	++		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	Р	Р	Р		Р				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				-					n/a															
Medium Term				0					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

#### Objectives

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling
- 24. To minimise noise and vibration levels and disruption to people and

Chapter: 4 Housing	<b>Policy:</b> H17 Student accommodation (Policy H15)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Text deleted from paragraph 4.17.1 that explained how each student bedroom would be counted towards boroughs' housing completions. This information has been moved to the supporting text of Policy H1 and amended to bring it into line with the how the Government counts student bedrooms for the Housing Delivery Test.

Policy references and document references have been updated to reflect amended titles. No material change.

The policy references in paragraph 4.17.8 has been changed to clarify how applications can follow the Fast Track Route by flowing the requirements of Policy H6. No material change.

#### Panel recommendation changes

Additional text has been added to Part A 3) of the policy to clarify that there is not a requirement for all the accommodation in the development to be subject to a nomination agreement, but that the requirement only applies to a majority of the accommodation. This was the intent of the policy and this was already stated in the supporting text thus there is no change in the policy requirement. No material change.

New text has been added to Part A 4) c) to clarify that the affordable student accommodation will form part of the accommodation that is subject to a nomination agreement with higher education providers, to enable the effective allocation to students who are most in need of this accommodation. This was the intent to the policy, and this was already stated in the supporting text thus there is no change in the policy requirement. No material change.

- 2. SEA (Strategic Environmental Assessment)
- 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

No impacts

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts

5. EqIA - Equality Impact Assessment									
a. are the changes likely to have an impact on one or more protected characteristics?									
No impacts									
b. If yes, summarise the impact on the protected characteristic(s).									
N/A									

# Chapter 5 Social Infrastructure

Chapter: 5 Social Infrastructure	<b>Policy:</b> S1 Developing London's social infrastructure

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured Part A to clarify that a borough's needs assessment of social infrastructure should inform the preparation of development plans. Clarified that needs assessments should involve relevant stakeholders, including the local community, as identified in paragraph 5.1.3. Re-phrased Part F to improve readability.

References in supporting text:

- Illustrated the wide range of providers delivering social infrastructure to recognise the roles of both formal and informal services such as networks and community support no material change
- Inclusion of reference to encourage boroughs to plan for social infrastructure delivery in their infrastructure delivery plan
- Strengthened the policy to ensure needs assessments are informed by an audit of existing facilities and services and demographic and socio-economic data required by Policy D1: London's form, character and capacity for growth
- Strengthened the policy to ensure where social infrastructure is being replaced, that this replacement be realistic demonstrating funding, appropriate site availability and timely delivery of adequate facilities.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

## **Objective 11: Infrastructure**

Requiring needs assessments to be informed by an understanding of the demographic make-up of
communities and socio-economic data is likely to help provide social infrastructure that meets the
needs of the communities it serves and can support expected growth and movement of communities
from the delivery of new housing. This is likely to have minor positive impacts in the short to medium
term and significantly positive impacts in the longer term, the matrix has been updated to reflect
this.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### **Objective 1: Equality and inclusion**

• Clarifying that boroughs should collaborate with relevant stakeholders, including the local community, when undertaking a needs assessment for social infrastructure is likely to help provide greater opportunities for local communities to participate in policy development This is likely to help communities voice what opportunities they need to lead active, fulfilling lives and to help boroughs improve their understanding of the community's needs to inform policies. This is likely to have minor positive impacts in the short term and significantly positive impacts in the longer term, the matrix has been updated to reflect this.

## 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

## 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

# Objective 1 Equality and Inclusion

• Clarifying that boroughs should collaborate with relevant stakeholders, including the local community, when undertaking a needs assessment for social infrastructure should help to ensure that community needs are better understood and planned for. This is likely to help communities voice what opportunities they need to lead active, fulfilling lives and to inform borough policy. This is likely to have minor positive impacts in the short term and significantly positive impacts in the longer term, the matrix has been updated to reflect this.

#### Objective 3 Health and health inequalities

• Clarifying that a borough's needs assessment of social infrastructure should inform the preparation of development plans will ensure community needs for health care and existing health inequalities are understood. This is likely to help reduce mental health and wellbeing inequalities faced by many older people and disabled people who often have more complex health needs1, as well as people who come under the protected characteristic of gender reassignment who face barriers to accessing health services2. This is likely to have positive impacts in the short and medium term and significantly positive impacts in the longer term.

# **Objective 11: Infrastructure**

• Clarifying that a borough's needs assessment of social infrastructure should inform the preparation of development plans will ensure that the burial space needs of religious and belief groups within a borough are understood to inform policy development to meet need. This is likely to help improve equity of access to burial space for religious and belief groups including Buddhist, Muslim and Jewish people for whom burial is their only option3. This is likely to result in minor positive impacts in the short and medium term and significantly positive impacts in the longer term, the matrix has been updated to reflect this.

<sup>&</sup>lt;sup>1</sup> EHRC 2016, Is England Fairer? The state of equality and human rights 2016

<sup>&</sup>lt;sup>2</sup> EHRC (2016) Is England Fairer? The state of equality and human rights in 2016.

<sup>&</sup>lt;sup>3</sup> Cemetery Research Group for the GLA (2010) Audit of London Burial Provision.

#### **S1 Social Infrastructure**

IIA Element												IIA Obj	ectives	5										$\neg$
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		+	n/a	+	0	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term						n/a	n/a		+	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term						n/a	n/a		+	n/a	++	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Direct / Indirect						n/a	n/a		I/D	n/a	I/D	D	D	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a
Temporary / Permanent						n/a	n/a		T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	Р	n/a	Т	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		L/G L	n/a	L	L/G L/ W	L	L	n/a	L	n/a	n/a	n/a	L/G L/ W	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	+	?	n/a	+	+	+/?	+	?	+	+	+	n/a	n/a		n/a	n/a	n/a	0	n/a	n/a	n/a	?
Medium Term	+	+	+	?	n/a	+	+	+/?	+	+/?	+	+	+	n/a	n/a		n/a	n/a	n/a	0	n/a	n/a	n/a	?
Long Term	++	+	#	?	n/a	+	+	+/?	+	+/?	#	+	+	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect	D	D	ı	I	n/a	D	I	I/D	I/D	ı	D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	L	L	L	L	L	L	L	L	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA										1											•			
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		0	n/a	n/a		0
Medium Term	+	+	++		n/a				n/a	n/a				n/a	n/a		n/a	n/a		0	n/a	n/a		0
Long Term	++	+	++		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		I/D	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		L	n/a	n/a		L
CSIA																								
Short Term				0					0															
Medium Term				+					0															
Long Term				+					0															
Direct / Indirect				I					ı															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

**Objectives** 

- 1. 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 5 Social Infrastructure	<b>Policy:</b> S2 Health Facilities (Policy S2 Health and social
	care facilities)

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured Part A (3) to clarify that the needs assessment should be informed by an audit of existing provision to ensure the requirements for needs assessments are consistent across all social infrastructure policies.

References in supporting text:

- supporting preventative measures through an integrated service delivery of health and social care facilities and services
- Updated the NHS Long Term Plan priorities to include support for health management and prevention and the reduction in pressure on emergency services through digital care— no material change
- Highlighting the development of new integrated care systems to deliver Sustainability and Transformation Plans no material change
- use of digital consultation no material change

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 11: Infrastructure

Highlighting the NHS Long Term Plan priorities to increase the use of digital consultations in primary and outpatient care as a consideration when identifying and addressing local health and social care needs in development plans is likely to help boroughs better understand and manage requirements when planning for physical healthcare infrastructure to meet population growth. This is likely to have minor positive impacts in the short term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3: Health and Health Inequalities

Identifying how health and social care facilities and services will be delivered through integrated care systems as a consideration when identifying and addressing local health and social care needs in development plans is likely to help boroughs plan for the delivery of integrated primary and specialist, physical and mental health services to help improve the physical and mental health and wellbeing of their communities. This is likely to have minor positive impacts in the short term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/a

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, gender reassignment and race.

#### b. If yes, summarise the impact on the protected characteristic(s).

#### **Objective 3: Health and Health Inequalities:**

- Supporting the delivery of integrated care systems is likely to benefit people who come under the protected characteristic of gender reassignment by promoting an integrated approach to providing the health and social care facilities and services they need to help reduce existing barriers to care and inequalities in physical and mental health and wellbeing. LGBT people are at greater risk of poor mental health compared with those identifying as heterosexual<sup>1</sup>. This is likely to result in minor positive impacts over the short term and significantly positive impacts in the medium to long term once these systems are in place, the matrix has been updated to reflect this.
- The delivery of integrated care systems is likely to benefit Gypsies and Travellers who experience several health inequalities, including shorter life expectancy<sup>2</sup>. An integrated approach to health and social care facilities and services will help reduce barriers experienced by Gypsies and Travellers to accessing primary care services to help reduce inequalities. This is likely to result in minor positive impacts over the short term and significantly positive impacts in the medium to long term once these systems are in place, the matrix has been updated to reflect this.

<sup>2</sup> The Traveller Movement (2016) Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health.

<sup>&</sup>lt;sup>1</sup> EHRC (2016) Is England Fairer? The state of equality and human rights.

### **S2** Health Facilities

IIA Element												IIA Obj	ectives	S										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1			1	1				ı —	ı		<u> </u>			ı	1		1			
Short Term		+				+	n/a		n/a	+	+	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Medium Term		++				+	n/a		n/a	+	++	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Long Term		++				+	n/a		n/a	+	++	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	?	n/a	+	n/a	n/a
Direct / Indirect						D	n/a		n/a	I	I/D	n/a	n/a	ı	n/a	n/a	n/a	n/a	n/a	ı	n/a	I/D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	Р	n/a	Т	n/a	n/a
Local / Greater London / Wider Region / Global						L/G L	n/a		n/a	L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a	n/a
EQIA																								
Short Term	+/?	+/?	+	n/a	n/a	+	+	0	n/a	n/a	+	n/a	n/a	0	n/a		n/a							
Medium Term	+/?	+/?	++	n/a	n/a	+	+	+	n/a	n/a	+	n/a	n/a	+	n/a		n/a							
Long Term	+/?	+/?	++	n/a	n/a	+	+	+	n/a	n/a	+	n/a	n/a	+	n/a		n/a							
Direct / Indirect	ı	ı	I	n/a	n/a	D	D	I	n/a	n/a	-	n/a	n/a	ı	n/a		n/a							
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	T/P	n/a		n/a							
Local / Greater London / Wider Region / Global	L	L	L/G L	n/a	n/a	L/G L	L/G L	L/G L	n/a	n/a	L	n/a	n/a	L	n/a		n/a							
HIA															<u> </u>			ı						
Short Term	+	+	+		n/a				n/a	n/a				0	n/a	ı	n/a	n/a		?	n/a	n/a		n/a
Medium Term	+	+	++		n/a				n/a	n/a				+	n/a		n/a	n/a		?	n/a	n/a		n/a
Long Term	+	+	++		n/a				n/a	n/a				+	n/a		n/a	n/a		?	n/a	n/a		n/a
Direct / Indirect	D	D	I/D		n/a				n/a	n/a				ı	n/a		n/a	n/a		ı	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	n/a		n/a	n/a		Р	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		n/a				n/a	n/a				L	n/a		n/a	n/a		L	n/a	n/a		n/a
CSIA																								
Short Term				0					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 5 Social Infrastructure	<b>Policy:</b> S3 Education and childcare facilities

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured Part A (1) to clarify that a borough's needs assessment of education and childcare facilities should inform the preparation of development plans. Clarified that needs assessments should include an audit of existing facilities. These changes ensure the requirements for needs assessments are consistent across all Social Infrastructure policies.

Clarified Part A (2) to ensure sites are identified in development plans where there is a need for school places, including Special Educational Needs and Disability (SEND) places.

Clarified in Part C that any proposed loss of sport or recreation land (including playing fields) within schools and childcare facilities should be considered against the requirements of Policy S5: Sports and recreation facilities.

References in supporting text:

- Strengthened paragraph 5.3.6 to promote the importance of planning for SEND provision
- Re-phrased paragraph 5.3.10 to improve readability no material change
- Included 'forest schools' in the list of natural features that should be incorporated into playgrounds and school sites

### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

N/A.

### 3. HIA (Health Impact Assessment)

a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1: Equality and inclusion

 Promoting the importance of planning for SEND (Special Educational Needs and Disability) places is likely to help increase opportunities for children and young people to access a choice of good quality learning environments that cater for those with specific requirements, whether this be in a mainstream school or specialist learning environment. This is likely to have minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix.

Objective 20: Natural Capital and Natural Environment

 Encouraging greenery in playgrounds and schools by promoting the use of forest schools is likely to help give children greater access to nature. This is likely to have minor positive impacts in the short term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

### 4. CSIA (Community Safety Impact Assessment)

a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

N/A

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

Yes, children and young people with Special Educational Needs and Disability.

### b. If yes, summarise the impact on the protected characteristic(s).

### Objective 1: Equality and inclusion

Requiring development plans to identify school sites to meet the demand for school places for children with SEND (Special Educational Needs and Disability) requirements is likely to help increase opportunities for these children to access barrier free learning environments that cater to those with specific requirements, whether this be in a mainstream school or specialist learning environment. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term for disabled children, their families and carers. The matrix has been updated to reflect this.

### **Objective 3 Health and Health Inequalities**

Requiring development proposals proposing a loss of sport or recreation land (including playing fields) within schools and childcare facilities to be considered against the requirements of Policy S5: Sports and recreation facilities will ensure children and young people have adequate access to sports and recreational facilities. This is likely to help improve the mental and physical health of children and young people by ensuring they can access sports and recreational activities at school to reduce inequalities experienced in physical and mental health. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

### **Objective 12 Education and skills**

Clarifying Part A(2) to ensure sites are identified in development plans where there is a need for school places, including SEND provision is likely to help ensure the provision of sufficient school places to meet London's population growth. Providing SEND places should result in a positive impact for many disabled children and young people by enabling them to access good quality education which is important in improving life chances and reducing barriers to future employment in adulthood. This is likely to result in minor positive effects in the short term and significantly positive effects in the medium to long term, the matrix has been updated to reflect this.

### S3 Education

IIA Element												IIA Obj	ectives	•										
=	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA								1																
Short Term						0	+		+	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Medium Term						0	+		+	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Long Term						0	+		+	++	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	+
Direct / Indirect						ı	I/D		I/D	I	I	I	I/D	I/D	n/a	I/D	n/a	n/a	n/a	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	Т	n/a	T/P
Local / Greater London /							L/G		L/G	L/G	L/G	L/G	L/G											
Wider Region / Global						L	L		L	L/ W	L/ W	L/ W	L	L	n/a	L	n/a	n/a	n/a	L	n/a	L	n/a	L
EQIA																								
Short Term	+	+	+	+	n/a	n/a	+	+	+	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	++	+	++	+	n/a	n/a	+	+	+	+	+	++	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	++	++	++	++	n/a	n/a	+	+	+	++	+	++	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	ı	ı	n/a	n/a	ı	ı	ı	ı	ı	ı	n/a	n/a	n/a		n/a	n/a	n/a	ı	n/a	n/a	n/a	n/a
Direct / Indirect	Р	Р	T/P	Р	n/a	n/a	T/P	T/P	Р	Р	Р	Р	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	n/a	n/a	L	L	L	L/G L/ W	L/G L/ W	L/G L/ W	n/a	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	n/a
HIA				,																				
Short Term	+	+	+		n/a				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?
Medium Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		++	n/a	n/a		?
Long Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		++	n/a	n/a		?
Direct / Indirect	D	D	D		n/a				I/D	n/a				I/D	n/a		n/a	n/a		ı	n/a	n/a		ı
Temporary / Permanent	Р	Р	Р		n/a				T/P	n/a				T/P	n/a		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
CSIA																								
Short Term				0					+															
Medium Term				0					+															
Long Term				0					+															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 5: Social Infrastructure.	Policy: S4: Play and Informal Recreation

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured Part A to clarify that the needs assessment should be informed by an audit of existing provision and that cross-borough collaboration should be considered. These changes ensure the requirements for needs assessments are consistent across all Social Infrastructure policies.

Rephrased Part B (2) to improve readability. Inserted new Part B(2)(e) to clarify that play space provided in residential developments should be overlooked to enable passive surveillance as required in paragraph 5.4.3. Inserted new part B(2)(f) to make it explicit that play space should not be segregated.

References in supporting text:

- Clarification that boroughs should consult with children and young people when preparing needs assessments
- That the different types of spaces children play in is considered in the design and layout of developments – no material change
- That the design of play provision should balance the need for safety and providing an element of risk for children's development no material change
- Clarification that boroughs are encouraged to collaborate on the development of play strategies no material change.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 - Design:

Encouraging a range of different types of play spaces that balance the need for safety and providing
an element of risk for children's development when designing proposals is likely to encourage a more
inclusive design approach that considers the needs of children and young people and helps create
spaces that provide a sense of place. This is likely to result in minor positive impacts over the short
term and significantly positive impacts over the medium to long term, the matrix has been updated
to reflect this.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 – Equality and inclusion:

• Requiring new residential developments to design play space that is accessible to all children regardless of the housing tenure they live in is likely to increase opportunities for all children to socialise and play. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix.

Objective 2 – Social Integration:

• Ensuring new play space is accessible to all children living in residential developments, is likely to help contribute towards the creation of more socially integrated communities by providing greater opportunities for children from a range of different backgrounds to play together. This is likely to result in result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix.

### 4. CSIA (Community Safety Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

### 5. EqIA - Equality Impact Assessment

## **a.** are the changes likely to have an impact on one or more protected characteristics? (use the EqIA guide questions (purple) to think about which groups maybe affected)

Yes, age, disability

### b. If yes, summarise the impact on the protected characteristic(s).

### Objective 1 – Equality and inclusion:

- Requiring new residential developments to design play space that is accessible to all children regardless of the housing tenure they live in will help provide more opportunities for children and young people of different ages, race, sex and religion to socialise and play. This is likely to result in significantly positive impacts ++ in the medium and longer term, the matrix has been updated to reflect this.
- Requiring accessible play space in residential developments will help increase opportunities for disabled children and young people to access barrier free play environments where they live. This is likely to result in significantly positive impacts in the medium term and longer term for disabled children and young people and their families and carers, the matrix has been updated to reflect this.

### Objective 2 – Social Integration:

• Ensuring new play space is accessible to all children living in residential developments will help contribute towards the creation of more socially integrated communities by providing greater opportunities for children of different ages, race, sex and religion to play together. This is likely to result in minor positive impacts in the short term and significantly positive impacts over the medium to long term, the matrix has been updated to reflect this.

### Objective 7 – Design:

Encouraging a range of different types of play spaces that balance the need for safety and providing
an element of risk for children's development when designing developments is likely to encourage a
more inclusive design approach that considers the needs of children and young people and helps
create spaces that provide a sense of place. This is likely to result in minor positive impacts in the
short term and significantly positive impacts over the medium to long term, the matrix has been
updated to reflect this.

### Objective 8 – Accessibility:

• Requiring new residential developments to design play space that is accessible to all children regardless of the housing tenure they live in will help ensure play spaces can be equally accessed by all children and young people living in the development. This requirement will help disabled children and young people access barrier free play environments throughout the development they live in. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

### Objective 11 – Infrastructure:

• The requirement for playspace to be accessible to all children and young people is likely to help improve equity of access to the environmental, social and physical infrastructure they need. This requirement will help disabled children and young people access barrier free play environments throughout the development they live in. This is likely to result in positive minor impacts in the short

term and significantly positive impacts in the medium to long term, the matrix has been updated to reflect this.

### S4 Play and informal recreation

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA													1					1						
Short Term						+	+		+	n/a	+	n/a	n/a	+	0	+	n/a	n/a	0	+	n/a	+	n/a	?
Medium Term						+	++		+	n/a	+	n/a	n/a	+	0	+	n/a	n/a	+	+	n/a	+	n/a	?
Long Term						+	++		+	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	+	n/a	+	n/a	?
Direct / Indirect						I/D	I/D		I/D	n/a	I/D	n/a	n/a	I/D	I/D	I/D	n/a	n/a	I/D	ı	n/a	I/D	n/a	ı
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	Т	n/a	T/P
Local / Greater London / Wider Region / Global						L	L		L	n/a	L	n/a	n/a	L	L	L	n/a	n/a	L	L	n/a	L	n/a	L
EQIA																								
Short Term	+	+	+	+	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a	1	n/a	n/a	n/a	+	n/a	n/a	n/a	?
Medium Term	++	++	++	+	n/a	+	++	+	+	n/a	++	n/a	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Long Term	++	++	++	++	n/a	+	++	++	+	n/a	#	n/a	n/a	+	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect	D	D	D	D	n/a	D	D	D	D	n/a	D	n/a	n/a	D	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	ı
Temporary / Permanent	Р	Р	Р	Р	n/a	Р	Р	Р	Р	n/a	Р	n/a	n/a	Р	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	L	L	L	L	n/a	L	n/a	n/a	L	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA							1	1							ı			1						
Short Term	+	+	+		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Medium Term	++	++	++		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Long Term	++	++	++		n/a				+	n/a				?	n/a		n/a	n/a		+	n/a	n/a		-
Direct / Indirect	D	D	D		n/a				D	n/a				ı	n/a		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	Р	Р	Р		n/a				Р	n/a				T/P	n/a		n/a	n/a		Р	n/a	n/a		Т
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L	n/a	n/a		L
CSIA Short Term				?					+															
Medium Term				?					+															
Long Term				?					+															
Direct / Indirect				ı					D															
Temporary / Permanent				T/P					Р															
Local / Greater London / Wider Region / Global				L					L															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 5 Social Infrastructure	<b>Policy:</b> S5 Sports and recreation facilities

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured Part A (1) to clarify that a borough's needs assessment for sports and recreation facilities should include an audit of existing facilities and inform the preparation of development plans

Clarified Part A (2) to ensure boroughs identify sites for sports and recreation in their development plans where this can be justified by a borough's needs assessment. These changes ensure the requirements for needs assessments are consistent across all Social Infrastructure policies.

Inclusion of additional clause BA to strengthen support for the retention of existing sports and recreational land and facilities and clarify circumstances where the loss of facilities or land may be acceptable.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 11: Infrastructure

• Strengthening support for the retention of sports and recreation land and facilities and the identification of sites for new facilities is likely to help boroughs ensure sports and recreation infrastructure is available to meet demand from population growth. This is likely to result in minor positive impacts in the short term and significantly positive impacts over the medium to long term, the matrix has been updated to reflect this.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3: Health and Health Inequalities

• Strengthening support for the retention of sports and recreation land and facilities and the identification of sites for new facilities is likely to help retain and promote increased opportunities for physical activity to improve the physical and mental health and wellbeing of Londoners. This is likely to result in minor positive impacts in the short term and significantly positive impacts over the medium to long term, these impacts are already reflected in the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A.

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

N/A.

b. If yes, summarise the impact on the protected characteristic(s).

N/A.

### **S5 Sports and recreation**

IIA Element												IIA Obj	jectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA								1		<u> </u>					<u> </u>		<u> </u>							
Short Term						+	0		0	n/a	+	n/a	?/+	0	n/a	0	n/a	n/a	+	0	n/a	+	n/a	?
Medium Term						+	+		+	n/a	++	n/a	?/+	+	n/a	+	n/a	n/a	+	0	n/a	+	n/a	?
Long Term						+	+		+	n/a	++	n/a	?/+	+	n/a	+	n/a	n/a	+	0	n/a	+	n/a	?
Direct / Indirect						I/D	1		ı	n/a	I/D	n/a	ı	ı	n/a	ı	n/a	n/a	-	ı	n/a	I/D	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	T/P	Р	n/a	Т	n/a	T/P
Local / Greater London / Wider Region / Global						L	L/G L		L/G L	n/a	L/G L	n/a	L/G L	L/G L	n/a	L/G L	n/a	n/a	L/G L	L	n/a	L	n/a	G/ GL
EQIA																								
Short Term	+	+	+	?	n/a	+	?	+	0	n/a	+	n/a	?/+	0	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	n/a	+	?	+	+	n/a	+	n/a	?/+	+	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+	?	n/a	+	?	+	+	n/a	+	n/a	?/+	+	n/a		n/a	?	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	I	n/a	D	ı	I/D	ı	n/a	I/D	n/a	ı	ı	n/a		n/a	I	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	n/a		n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L/G L	n/a	L/G L	L/G L	L	L/G L	n/a	L/G L	n/a	L/G L	L/G L	n/a		n/a	L/G L	n/a	n/a	n/a	n/a	n/a	n/a
HIA																					•			
Short Term	+	+	+		n/a				0	n/a				0	n/a		n/a	n/a		0	n/a	n/a		n/a
Medium Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		0	n/a	n/a		n/a
Long Term	++	++	++		n/a				+	n/a				+	n/a		n/a	n/a		0	n/a	n/a		n/a
Direct / Indirect	D	D	D		n/a				ı	n/a				ı	n/a		n/a	n/a		ı	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	n/a		n/a	n/a		Р	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		n/a				L/G L	n/a				L/G L	n/a		n/a	n/a		L	n/a	n/a		n/a
CSIA																								
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Medium Term				?					+															
Long Term				?					+															
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Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/G L															

- 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
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- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
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- 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 motorised transport
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- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 5 Social Infrastructure	Policy: S6 Public Toilets

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Restructured policy to improve readability and clarified what scale of development should provide public toilets.

A2 - inserted text to clarify that Changing Places toilets should be designed in accordance with the guidance found in the British Standard

References in supporting text:

• Clarified that consideration be given to the capacity of facilities, particularly for female gender specific toilets and highlighted the relevant standard to be used to determine toilet numbers.

### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

N/A

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

### Objective 1: Equality and inclusion

 Ensuring the capacity of facilities is considered to minimise queuing, particularly for female gender specific toilets is likely to help reduce inequalities in access between user groups and secure greater provision to help Londoners access the facilities they need to participate in public life. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term. This is already reflected in the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, sex.

b. If yes, summarise the impact on the protected characteristic(s).

### Objective 1: Equality and inclusion

- Ensuring the capacity of facilities is considered to minimise queuing for female gender specific toilets
  is likely to help reduce inequalities in access between gender groups and help to advance equality of
  opportunity for females. This is likely to result in minor positive impacts in the short term and
  significantly positive impacts in the medium to long term., these impacts are already reflected in the
  matrix.
- The clarification in the policy on Changing Places toilets could potentially lead to an increase in provision, which would have a positive impact for disabled people with complex, profound or multiple impairments, their carers and family members. By providing greater opportunities for this

- group to participate in public life and other activities by, allowing them to stay away from home for longer periods of time. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix.
- Changing Places toilets are designed for assisted use and, as such, can benefit those who require the assistance of a carer or companion to use the toilet- including people with certain neurodiverse conditions including, for example, dementia. People living with conditions such as Alzheimer's or dementia are more likely to be older. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix

### **Objective 8: Accessibility**

- The clarification in the policy on Changing Places toilets could potentially lead to an increase in provision, which would have a positive impact for disabled people with complex, profound or multiple impairments, their carers and family members. Providing greater opportunities for this group to participate in public life and other activities by allowing them to stay away from home for longer periods of time. This is likely to result in minor positive impacts in the short term and significantly positive impacts in the medium to long term, these impacts are already reflected in the matrix.
- Changing Places toilets are designed for assisted use, and as such can benefit those who require the
  assistance of a carer or companion to use the toilet- including people with certain neurodiverse
  conditions including, for example, dementia. People living with conditions such as Alzheimer's or
  dementia are more likely to be older. This is likely to result in minor positive impacts in the short
  term and significantly positive impacts in the medium to long term, these impacts are already
  reflected in the matrix

### **Objective 11: Infrastructure**

- Ensuring the capacity of facilities is considered to minimise queuing for female gender specific toilets is likely to help improve equity of access for females to public toilets. The clarification in the policy on Changing Places toilets could potentially lead to an increase in provision, which would have a positive impact for disabled people with complex, profound or multiple impairments, their carers and family members. Providing greater opportunities for this group to participate in public life and other activities by staying away from home for longer periods of time.
- Changing Places toilets are designed for assisted use, and as such can benefit those who require the
  assistance of a carer or companion to use the toilet- including people with certain neurodiverse
  conditions including, for example, dementia. People living with conditions such as Alzheimer's or
  dementia are more likely to be older. This is likely to result in minor positive impacts in the short
  term and significantly positive impacts in the medium to long term, these impacts are already
  reflected in the matrix.

# Chapter 6 Economy

Chapter: 6 Economy	Policy: E1 Offices

### a. Further Suggested Changes

Deletion of cross-references to policies in Parts C, E and G of the policy – No material change

Additional requirement in Part D2 to have regard to (rather than just a reference to) the town centre network office guidelines elsewhere in the Plan.

Reconfiguration of Part G so that the requirements of this part of the policy have a clear logical order. Clarification that this part relates to office development proposals – No material change

Additional requirement in Part G for office development proposals to take into account the need for a range of suitable workspace.

References in the supporting text:

 Addition of footnote 70B to clarify that offices include B1a and office-related B1b use classes – no material change

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10 Economic competitiveness and employment

The requirement to have regard to the town centre network office guidelines, and the requirement for a range of suitable workspace in office developments, should make a minor contribution toward providing the right type of employment floorspace in the right locations to support London's economic competitiveness. This is likely to have minor positive impacts in the short, medium and longer term. These impacts are already reflected in the Matrix.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No impacts

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

No impacts

b. If yes, summarise the impact on the protected characteristic(s).

Chapter: 6 Economy	<b>Policy:</b> E2 Providing suitable business space

### a. Further Suggested Changes

Deletion of requirement in Part A to protect and provide low cost workspace, and replacement of this with a requirement to provide and protect a range of business space in terms of type, use and size at an appropriate range of rents, alongside an addition of an explicit requirement for local Development Plan Documents to include policies that aim to achieve this.

Additional requirement in Part AA for development for business uses to ensure the space is fit for purpose.

Introduction in Part B of requirement for the areas where there is a shortage of lower-cost workspace to be identified in a local Development Plan Document. Extension of this to cover shortages of workspace of particular types, uses or sizes.

Additional requirement in Part B(2) for development proposals in relevant areas to include affordable workspace where appropriate.

Deletion (in Part B(3)) of allowance in exceptional circumstances for loss of workspace where suitable alternative accommodation is available nearby.

Extension of the application of the whole policy from B1 use class to all B use classes.

References in the supporting text:

- Additional supporting text to justify and explain the policy requirements for suitable workspace.
- Clarification that low-cost business space may be low cost due to either its specification or its location.
- Reconfiguration of supporting text to reflect amended policy requirements relating to the need for evidence in a local Development Plan Document to support the operation of the policy.
- Deletion of supporting text relating to the provision of suitable alternative accommodation.

### **b.** Panel Recommendations

Deletion of requirement in Part A to provide and protect business space at an appropriate range of rents (Panel recommendation PR26).

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10 Economic competitiveness and employment

- The removal of the requirement to protect and provide low cost workspace and the Panel's recommended deletion of a requirement for workspace to be provided at an appropriate range of rents could result in some businesses being unable to find workspace they can afford to lease in an appropriate location. This could increase barriers to employment and discourage business start-ups and the growth of businesses. It is likely to have a negative impact in the short, medium and long term.
- The requirement for development for business uses to ensure the space is fit for purpose, the requirement for affordable workspace where appropriate, and the application of the policy to all B use classes would be likely to facilitate the provision of the right type of employment floorspace in the right place, and could help to encourage start-ups and support business growth. This is likely to have a minor positive impact in the short, medium and long term.

- The additional requirements for local Development Plan Documents to include policies that support the provision and protection of a range of business space, and for Part B of the policy to cover areas where there is a shortage of workspace of particular types, uses or sizes, should help to ensure that boroughs are planning appropriately to meet demand for the right sort of workspace in the right locations, and this should mitigate some of the negative impacts identified above caused by the removal from the policy of the requirement to protect and provide low cost workspace, particularly over the longer term as Local Plans are brought forward and implemented.
- Overall, the changes to the policy are likely to result in the impact of the policy being less positive in the medium term. The Matrix has been reflected to update this.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No Impacts

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes

### b. If yes, summarise the impact on the protected characteristic(s).

### Objective 1 Equality and inclusion

The removal of the requirement to protect and provide low cost workspace may result in higher increases in business costs, particularly in places undergoing significant change and in prime locations. This could have negative impacts on groups that are likely to face less secure and stable employment and barriers to employment, particularly younger people, disabled people, people from BAME backgrounds, and women, thereby making the policy less effective in minimising disadvantage and reducing inequality. This may be mitigated in part by the additional policy requirements for an appropriate range of business spaces to be provided that meet identified needs, and the requirement for development proposals in relevant areas to include affordable workspace where appropriate. Overall, however, the policy would still have positive impacts over the short, medium and long term, and no changes to the Matrix are necessary.

### Objective 10 Economic Competitiveness

The removal of the requirement to protect and provide low cost workspace may result in higher increases in business costs, particularly in places undergoing significant change and in prime locations. This could have negative impacts on groups that are likely to face less secure and stable employment and barriers to employment, particularly younger people, disabled people, people from BAME backgrounds, and women. This may be mitigated in part by the additional policy requirements for an appropriate range of business spaces to be provided that meet identified needs, and the requirement for development proposals in relevant areas to include affordable workspace where appropriate. Overall, the changes to the policy are likely to result in the impact of the policy being less positive in the medium term in relation to Objective 10. The Matrix has been reflected to update this.

### **E2 Providing Suitable Business Space**

IIA Element												IIA Obj	ectives	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA									I						1	1		1	ı					
Short Term						+	n/a		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						+	n/a		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						+	n/a		n/a	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						ı	n/a		n/a	D	I/D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						Р	n/a		n/a	Р	T/P	n/a	Р	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	L/G L	L/G L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EQIA																								
Short Term	+	+	n/a	n/a	n/a	+	n/a	?	?	+	+	0	0	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	+	n/a	?	?	+	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	n/a	n/a	n/a	+	n/a	+	+	++	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	n/a	n/a	n/a	I	n/a	I/D	I/D	D	I/D	D	D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	Р	n/a	T/P	T/P	Р	T/P	Р	Р	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London /	L/G	L/G	n/a	n/a	n/a	L	n/a	L/G	L/G	L/G	L/G	L/G	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Wider Region / Global	L	L	11/4	11/4	11/ 4		11/4	L	L	L	L	L		11/ 4	11/ 4		11/4	11/4	11/4	11/4	11/4	11/ 4	11/4	11/4
HIA																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA									1															
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 6 Economy	Policy: E3 Affordable workspace
	l l

### a. Further Suggested Changes

Clarification to Parts A and B of the policy to make it clear that Part A relates to the type and purpose of workspace that should be secured as affordable, and that Parts B and C set out the circumstances in which affordable workspace should be secured – no material change

Addition in Part A1 of voluntary and community organisations to the examples of sectors with social value for which affordable workspace could be secured.

Further wording in Part B1 to make it clear that the policy only applies to areas identified in local plans and to sites where there is affordable workspace currently (or has been since the Plan was published) except where that was provided on a temporary basis pending redevelopment.

Requirement in Part C for boroughs to consider detailed affordable workspace policies in their Development Plans, strengthened from a broad encouragement.

References in the supporting text:

- Additional supporting text to justify and explain the policy requirements for affordable workspace.
- Clarification that affordable workspace should be secured in perpetuity or for at least 15 years.
- Addition of voluntary and community organisations.
- Redrafted supporting text relating to temporary affordable workspace, to reflect the insertion of the exception relating to temporary workspace into the policy wording.

### b. Panel Recommendations

Deletion of Part F, which required affordable workspace to be operational or have agreed finalised terms prior to residential elements being occupied (Panel recommendation PR27).

Insertion of supporting text to state that planning obligations used to secure affordable workspace should include mechanisms to ensure timely delivery (responding to Panel recommendation PR27).

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10 Economic competitiveness and employment

- The changes to the policy limit the circumstances in which affordable workspace might be secured, requiring there to be relevant areas identified in a borough's Local Plan or for the site to have existing affordable workspace. While the strengthening of Part C should ensure that all boroughs bring forward relevant policies regarding affordable workspace in their Local Plans, these changes could result in some businesses being unable to find workspace they can afford to lease in an appropriate location and could mean that it takes longer for affordable workspace to be developed. This could increase barriers to employment and discourage business start-ups and the growth of businesses.
- The deletion of the requirement for affordable workspace to be operational prior to residential elements being occupied could result in some delays to affordable workspace coming forward. This should be partially mitigated by the supporting text which advises that planning obligations used to secure affordable workspace should include mechanisms to ensure timely delivery.
- These changes to the policy are likely to result in the impact of the policy being less positive in the medium term. The Matrix has been reflected to update this.

### Objective 13 Culture

• The changes to the policy may mean that it takes longer for affordable workspace – including workspace for cultural production – to be developed. It is likely therefore that the policy will have a less positive impact in helping to maintain and increase appropriate cultural facilities, particularly in the short term. The Matrix has been reflected to update this.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No Impacts

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics? Yes

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion and Objective 2 Social Integration

The additional reference to voluntary and community organisations in the examples of sectors with social value for which affordable workspace could be secured may have a positive impact in terms of equality, inclusion and social integration in the short, medium and longer term. This is already reflected in the Matrix.

### Objective 10 Economic Competitiveness

The changes to the policy limit the circumstances in which affordable workspace might be secured. This may result in higher increases in business costs, particularly in places undergoing significant change and in prime locations. This could have negative impacts on groups that are likely to face less secure and stable employment and barriers to employment, particularly younger people, disabled people, people from BAME backgrounds, and women. This may be mitigated in part by the strengthening of Part C to ensure that all boroughs bring forward relevant policies regarding affordable workspace in their Local Plans. Overall, the changes to the policy are likely to result in the impact of the policy being less positive in the medium term in relation to Objective 10. The Matrix has been reflected to update this.

### E3 Affordable Workspace

IIA Element									IIA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	1				1		1									1	ı	1	ı	ı	ı	1	ı	
Short Term						+	n/a		n/a	+	+	+	0	n/a										
Medium Term						+	n/a		n/a	+	+	+	+	n/a										
Long Term						+	n/a		n/a	++	+	+	+	n/a										
Temporary / Permanent						D	n/a		n/a	D	I/D	I/D	I/D	n/a										
Direct / Indirect						T/P	n/a		n/a	Р	T/P	T/P	T/P	n/a										
Local / Greater London / Wider Region / Global						L/G L	n/a		n/a	L/G L	L/G L	L	L	n/a										
EQIA																								
Short Term	+	+	n/a	n/a	n/a	+	+	+	0	+	+	+	0	n/a	n/a		n/a							
Medium Term	+	+	n/a	n/a	n/a	+	+	+	+	+	+	+	+	n/a	n/a		n/a							
Long Term	++	++	n/a	n/a	n/a	++	++	+	+	++	+	+	+	n/a	n/a		n/a							
Temporary / Permanent	D	D	n/a	n/a	n/a	D	D	D	D	D	ı	I/D	I/D	n/a	n/a		n/a							
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	Р	T/P	T/P	T/P	n/a	n/a		n/a							
Local / Greater London / Wider Region / Global	L/G L	L/G L	n/a	n/a	n/a	L/G L	L/G L	L/G L	L/G L	L/G L	L/G L	L	L	n/a	n/a		n/a							
HIA	_																							
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA							1	1		l												1		
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
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- 8. To maximise accessibility for all in and around London
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- 10. 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
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- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
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- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 6 Economy	<b>Policy:</b> E4 Land for industry, logistics and services to
	support London's economic function

### a. Further Suggested Changes

Part A9 – Amendment to reflect change of Policy name for Policy E2 – No material change

Part H – Deleted reference to requirement for large scale proposals to consider providing smaller industrial units suitable for SMEs, as requirement covered by expanded Part C of Policy E2 – No material change

References in the supporting text:

- Clarifications regarding principle of no net loss of industrial floorspace capacity No material change
- New paragraph added, setting out circumstances in which an exceptional justification for a plot ratio lower than 65% for industrial only development may be appropriate.

### b. Panel Recommendations

Part A – Amendment to make it clear that a sufficient supply of industrial land and premises should be provided as well as maintained [PR28].

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• The possibility to provide exceptional justification for a plot ratio lower than 65% for industrial only development which require significant amount of yard and servicing space may support making the best use of land by applying a more flexible approach to respond to development-specific constraints and operational needs. This is likely to have minor positive impacts in the short, medium and long term. These impacts are already reflected in the matrix.

Objective 10 Economic competitiveness and employment

- The possibility to provide exceptional justification for a plot ratio lower than 65% on development for industrial uses only which require significant amount of yard and servicing space is likely to facilitate the provision of the right type of employment floorspace in the right locations to support London's economic competitiveness. This is likely to have minor positive impacts in the short, medium and long term. These impacts are already reflected in the matrix.
- The Panel Recommendation aimed at making it clear that a sufficient supply of industrial land and premises should be provided as well as maintained is likely to facilitate the provision of the right type of employment land and floorspace in the right locations to ensure London remains economically competitive. Overall, these changes are likely to have minor positive impacts in the short, medium and long term. These impacts are already reflected in the Matrix.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No Impact

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes, race

b. If yes, summarise the impact on the protected characteristic(s).

Objective 10 Economic competitiveness and employment

• The possibility to provide exceptional justification for a plot ratio lower than 65% on development for industrial uses only which require significant amount of yard and servicing space may help providing employment opportunities in the most deprived areas and positively affect low paid workers in industrial sectors, by helping to ensure that businesses that employ them can continue to operate within London. This may have a particularly positive impact on low paid workers in the wholesale, primary utilities and manufacturing sectors, who are more likely to be from BAME backgrounds<sup>1</sup>. Overall, these changes are likely to have minor positive impacts in the short, medium and long term. These impacts are already reflected in the matrix.

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<sup>&</sup>lt;sup>1</sup> Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

Chapter: 6 Economy	<b>Policy:</b> E5 Strategic Industrial Locations (SIL)

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Broad list of industrial-type activities from Part C replaced by reference to detailed list of industrial-type activities in Policy E4 Part E.

Part C6 of the Policy, which allowed small scale 'walk to' services for industrial occupiers such as workplace crèches or cafés in SIL has been deleted. These uses do not feature in the industrial-type activities listed in Policy E4 Part C and, therefore, are no longer explicitly allowed as appropriate uses in SIL.

Removal of cross-reference to the Agent of Change principles from Part E – no material change

Part E of the Policy has been amended to clarify that both existing and potential industrial activities in SIL should not be compromised or curtailed by residential development adjacent to SILs.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

### Objective 9 Connectivity

• The removal of 'walk to' services such as workplace crèches or cafés from the list of industrial-type activities appropriate in SIL locations may contribute to discouraging a modal shift to more sustainable forms of travel, due to the potential increased need for car trips to reach such facilities outside of SIL. However, the impacts are largely unknown and likely to be minimal, on the basis of the current limited presence of such services in SIL<sup>1</sup>. The matrix has been updated to reflect this.

### Objective 10 Economic competitiveness

 The clarification that both existing and potential industrial activities in SIL should not be compromised or curtailed by residential development adjacent to SILs may help facilitating the provision of the right type of employment floorspace in the right places to ensure that London remains economically competitive. This is likely to have minor positive impacts in the short term, and significantly positive impacts in the medium to long term. These impacts are already reflected in the matrix.

### Objective 14 Air quality

• The removal of 'walk to' services such as workplace crèches or cafés from the list of industrial-type activities appropriate in SIL locations may have negative impacts in terms of reducing NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions, mostly due to the potential increase in car trips to reach such facilities outside of SIL. However, on the basis of the current limited presence of such services in SIL, the actual impacts of this change are largely unknown and likely to be minimal. Overall, the impacts are likely to be minor negative in the short, medium and long term. These impacts are already reflected in the matrix.

### Objective 16 Climate change adaptation and mitigation

The removal of 'walk to' services such as workplace crèches or cafés from the list of industrial-type
activities appropriate in SIL locations may have negative impacts in terms of reduction of carbon
emissions, and may discourage shifts to more sustainable modes of transport, due to the potential
increased need for car trips to reach such facilities outside of SIL. However, on the basis of the current
limited presence of such services in SIL, the actual impacts of this change are largely unknown and likely

<sup>&</sup>lt;sup>1</sup> Figure 4.4 Employment and Floorspace by Sector on Surveyed Industrial Locations - London Industrial Land Demand, CAG Consultants, October 2017

to be minimal. Overall, the impacts are likely to be minor negative in the short, medium and long term. These impacts are already reflected in the matrix.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and Health Inequalities

• The removal of 'walk to' services such as workplace crèches or cafés from the list of industrial-type activities appropriate in SIL locations may negatively affect workers' health and wellbeing, and may disincentivise physical activity due to the potential increased need for car trips to reach such facilities outside of SIL. The impacts are likely to be minor negative in the short, medium and long term; however, on the basis of the current limited presence of such services in SIL, the actual impacts are largely unknown and likely to be minimal. The matrix has been updated to reflect this.

### 4. CSIA (Community Safety Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

Yes, age, race, sex and maternity

### b. If yes, summarise the impact on the protected characteristic(s).

### Objective 8 Accessibility

• The removal of 'walk to' services such as workplace crèches from the list of industrial-type activities appropriate in SIL locations may have negative impacts in terms of access to services and facilities for specific groups, such as single parents in employment and, particularly, single mothers. The impacts are likely to be minor negative in the short, medium and long term; however, on the basis of the current limited presence of such services in SIL and a general tendency for childcare to be sought close to home rather than near workplaces, the actual impacts are largely unknown and likely to be minimal. The matrix has been updated to reflect this.

### Objective 9 Connectivity

• The removal of 'walk to' services such as workplace crèches from the list of industrial-type activities appropriate in SIL locations may increase the overall need to travel to access services and amenities for specific groups, such as single parents in employment and, particularly, single mothers. The impacts are likely to be minor negative in the short, medium and long term; however, on the basis of the current limited presence of such services in SIL and a general tendency for childcare to be sought close to home rather than near workplaces, the actual impacts are largely unknown and likely to be minimal. The matrix has been updated to reflect this.

### Objective 10 Economic competitiveness and employment

• The clarification that both existing and potential industrial activities in SIL should not be compromised or curtailed by residential development adjacent to SILs may help facilitating the provision of employment opportunities in the most deprived areas and positively affect low paid workers in industrial sectors, by helping to ensure that businesses that employ them can continue to operate within London. This may have a particularly positive impact on low paid workers in the wholesale, primary utilities and manufacturing sectors, who would be more likely to be from BAME backgrounds<sup>2</sup>. These impacts are already reflected in the matrix.

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<sup>&</sup>lt;sup>2</sup> Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

• The removal of 'walk to' services such as workplace crèches from the list of industrial-type activities appropriate in SIL locations may have negative impacts in terms of support provided to working families, and may contribute to increase barriers to employment in terms of access to childcare for specific groups, such as single parents in employment and, particularly, single mothers. However, on the basis of the current limited presence of such services in SIL and a general tendency for childcare to be sought close to home rather than near workplaces, the actual impacts are largely unknown and likely to be minimal. Overall these changes are likely to have minor positive impacts in the short to medium term, and significantly positive impacts in the long term, although the actual impacts of some changes are largely unknown at this stage. The matrix has been updated to reflect this.

### **E5 Strategic Industrial Locations**

IIA Element	I											IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1		l .			1					Ι						<u> </u>	<u> </u>	Π			
Short Term						+	n/a		?	+	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	0
Medium Term						+	n/a		?	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	0
Long Term						+	n/a		?	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	0
Direct / Indirect						ı	n/a		1	D	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	I	I/D
Temporary / Permanent						T/P	n/a		T/P	Р	Р	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P
Local / Greater London / Wider Region / Global						L/G L	n/a		L/G L	L/G L	L/G L	n/a	n/a	L	n/a	L/G L	n/a	n/a	n/a	n/a	n/a	L/G L	L/G L	L/G L
EQIA		ļ		<b>!</b>	1		<b>!</b>	ļ				<u> </u>	<u> </u>		<b></b>									
Short Term	?	?	n/a	n/a	?	n/a	n/a	?/-	?/-	+/?	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Medium Term	?	?	n/a	n/a	?	n/a	n/a	?/-	?/-	+/?	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Long Term	?/-	+	n/a	n/a	?	n/a	n/a	?/-	?/-	++/	n/a	+	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Direct / Indirect	ı	ı	n/a	n/a	ı	n/a	n/a	D	-	D	n/a	I/D	n/a	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	n/a	n/a	T/P	n/a	n/a	T/P	T/P	Р	n/a	T/P	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	n/a	n/a	L/G L	n/a	n/a	L/G L	L/G L	L/G L	n/a	L/G L	n/a	L/G L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/G L
HIA	-	•	,		,	,	,		•	•	,					,	•							
Short Term	n/a	n/a	?/-		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		0
Medium Term	n/a	n/a	?/-		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		0
Long Term	n/a	n/a	?/-		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		0
Direct / Indirect	n/a	n/a	I/D		n/a				n/a	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	n/a	n/a	T/P		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		n/a				n/a	n/a				L/G L	n/a		n/a	n/a		n/a	n/a	n/a		L/G L
CSIA			-																					
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety

- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 6 Economy	<b>Policy:</b> E7 Industrial intensification, co-location and
	substitution

### brief summary of extent of changes and whether the change is already reflected somewhere in the policy

### a. Further Suggested Changes

Part B and C have been consolidated into Policy E7 Part B which now covers the intensification and consolidation processes in both SIL and LSIS, as well as co-location (in LSIS alone) – No material change.

Removal of reference from Part B aimed at ensuring that development in SIL or LSIS does not compromise the integrity or effectiveness of the area. This is covered by Part E of the Policy, which is cross-referenced in this Part. – No material change.

Strengthening of Part D3 to require the provision of industrial, storage or distribution floorspace in all situations, and not just where this is feasible.

Addition in Part D3 of cross-reference to Part B of Policy E2. Part B of Policy E2 requires further reprovision of floorspace than required in this policy in certain circumstances. The addition of the cross-reference does not alter the impact of Part D3 of Policy E7 – No material change.

Removal of Part D4, which allowed for suitable alternative accommodation to be provided elsewhere, subject to relocation support arrangements for existing businesses.

Removal of cross-references to a range of policies in Part E(4) – No material change.

References in the supporting text:

• Deletion of the second part of paragraph 6.7.3, as it broadly repeated detailed criteria included in Part D of Policy E7 – No material change.

### b. Panel Recommendations

Amendment to Part D to stipulate that proposals relating to non-designated industrial sites should only be supported where they meet the circumstances set out in this Part. [PR32]

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, will help to make the best and most efficient use of land, specifically brownfield sites. This will result in minor positive benefits in the short, medium and long term. These impacts are already reflected in the matrix.

Objective 10 Economic competitiveness and employment

• The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, and the Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites are likely to facilitate the provision of the right type of employment floorspace in the right place to support London's economic competitiveness. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

• The removal of the potential option to identify suitable alternative accommodation in reasonable proximity to the development proposal may help to ensure a frictional vacancy rate is maintained and not eroded through the displacement of capacity to vacant premises. The removal of the requirement to provide relocation support for existing businesses may negatively affect some businesses where they are displaced by redevelopment, however the change overall is likely to retain a greater quantity of industrial capacity in London. Overall, these changes are likely to have minor positive impacts in the short to medium term, and significantly positive impacts in the long term. These impacts are already reflected in the matrix.

### Objective 24 Noise and vibration

- The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, may potentially increase actual noise levels and disruption to future residents of such schemes. However, along with other relevant policies such as Policy D13 on noise, Policy E7 Part E4 requires that appropriate design mitigation measures are provided in any residential element part of mixed-use proposals to offset negative externalities, with particular consideration given to vibration and noise impacts. Overall this is likely to have neutral impacts in the short, medium and longer term. These impacts are already reflected in the matrix.
- The Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites may not contribute to the reduction of actual noise levels and disturbances from noise in certain areas, particularly where existing Non-Designated Industrial Sites are located in primarily residential areas. Overall, these changes are likely to have neutral impacts in the short, medium and long term. These impacts are already reflected in the matrix.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

### Objective 14 Air Quality

• The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, may increase the number of people exposed to particulates and NO2 concentrations, particularly vulnerable people, as a consequence of the industrial-related vehicular traffic. However, along with other relevant policies such as Policy SI1 on air quality, Policy E7 Part E4 requires that appropriate design mitigation measures are provided in any residential element part of mixed-use proposals to offset negative externalities, with particular consideration given to air quality, including dust, odour and emissions. Overall, this is likely to have minor negative impacts in the short, medium and long term. These impacts are already reflected in the matrix.

### Objective 24 Noise and vibration

- The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, may increase the number of people exposed to high levels of noise and vibrations. However, along with other relevant policies such as Policy D13 on noise, Policy E7 Part E4 requires that appropriate design mitigation measures are provided in any residential element part of mixed-use proposals to offset negative externalities, with particular consideration given to vibration and noise. Overall this is likely to have neutral impacts in the short, medium and longer term. These impacts are already reflected in the matrix.
- The Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites may result in no net reduction in the number of people exposed to high levels of noise and may not reduce night time noise in certain areas, particularly where Non-Designated Industrial Sites are located in primarily residential areas. Overall, these changes are likely to have neutral impacts in the short, medium and long term. These impacts are already reflected in the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

Yes, age, race.

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 5 Housing Supply, Quality, Choice and Affordability

- The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, may reduce the range and affordability of housing due to potential viability constraints in some instances. This may negatively affect those on lower incomes, and particularly BAME people and single parent families as these groups are more likely to live in households with an average annual income below £20,000, to be in social rented housing or renting private housing<sup>1</sup>, and to live in overcrowded accommodation<sup>2</sup>. However, the impact of this change is largely unknown as it depends on how this is implemented and managed at local level. These impacts are already reflected in the matrix.
- The Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites may not facilitate the overall delivery of houses that meets the needs of Londoners, potentially resulting in a more limited supply of new housing stock. This may negatively affect people on lower incomes, and particularly BAME people and single parent families as these groups are more likely to live in households with an average annual income below £20,000, to be in social rented housing or renting private housing, and to live in overcrowded accommodation. However, the impact of this change is largely unknown as it depends on how this is implemented and managed at local level. These impacts are already reflected in the matrix.

### Objective 10 Economic competitiveness and employment

- The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, and the Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites may support a diverse and resilient economy providing opportunities for all, and may positively affect low paid workers in the wholesale, primary utilities and manufacturing sectors, who are more likely to be from BAME backgrounds<sup>3</sup>. These impacts are already reflected in the matrix.
- The removal of the potential option to identify suitable alternative accommodation in reasonable proximity to the development proposal may help to ensure a frictional vacancy rate is maintained and not eroded through the displacement of capacity to vacant premises. The removal of the requirement to provide relocation support for existing businesses may negatively affect some businesses where they are displaced by redevelopment and may affect low paid workers in the wholesale, primary utilities and manufacturing sectors who are more likely to be from BAME backgrounds; however the change overall is likely to retain a greater quantity of industrial capacity in London. Overall, these changes are likely to have minor positive impacts in the short to medium term, and significantly positive impacts in the long term. These impacts are already reflected in the matrix.

### Objective 14 Air Quality

The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use
proposals on Non-Designated Industrial Sites, in appropriate circumstances, may have a negative impact
in terms of access to clean air for those more at risk of the negative effects of poor air quality,
particularly young people and older people. However, along with other relevant policies such as Policy SI1

<sup>&</sup>lt;sup>1</sup> Office of National Statistics – 2011 Census

<sup>&</sup>lt;sup>2</sup> EHRC (2016) Is England Fairer? The state of equality and human rights.

<sup>&</sup>lt;sup>3</sup> Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

on air quality, Policy E7 Part E4 requires that appropriate design mitigation measures are provided in any residential element part of mixed-use proposals to offset negative externalities, with particular consideration given to air quality, including dust, odour and emissions. Overall, this is likely to have minor negative impacts in the short, medium and long term. These impacts are already reflected in the matrix.

### Objective 24 Noise and vibration

- The strengthened requirement to re-provide industrial, storage or distribution floorspace in mixed-use proposals on Non-Designated Industrial Sites, in appropriate circumstances, may increase actual noise and vibration levels and disruption to future residents of such schemes, particularly affecting those individuals that are more sensitive to noise, such as older people<sup>4</sup> and very young children. However, along with other relevant policies such as Policy D13 on noise, Policy E7 Part E4 requires that appropriate design mitigation measures are provided in any residential element part of mixed-use proposals to offset negative externalities, with particular consideration given to noise and vibration. Overall this is likely to have neutral impacts in the short, medium and longer term. These impacts are already reflected in the matrix.
- The Panel Recommendation aimed at strengthening the policy protection for Non-Designated Industrial Sites may not contribute to minimise actual noise and vibration levels and disruption to people living in certain areas, especially where Non-Designated Industrial Sites are located in primarily residential areas, and might particularly affect those individuals that are more sensitive to noise, such as older people and very young children. Overall, these changes are likely to have neutral impacts in the short, medium and long term. These impacts are already reflected in the matrix.

<sup>&</sup>lt;sup>4</sup> An Age Friendly City: How far has London Come? Kings College London, 2016

Chapter: 6 Economy	<b>Policy:</b> E9 Retail, markets and hot food takeaways

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Insertion of Part B 3 which clarifies the approach to planning for an appropriate mix of shops and other commercial units and the contribution that can be made by large-scale commercial development in bringing these uses forward. Part E of the policy previously required all large-scale commercial development proposals to support the provision of small shops and commercial units. This was deleted as part of the Further Suggested Changes. Part B 3 requires boroughs to set out policies and site allocations to secure an appropriate mix of affordable units.

### References in the supporting text:

- Clarification that affordable commercial and shop units should be required through Development Plans, to reflect the changes to the policy.
- Reference added to the findings of the High Streets for All report regarding affordability of rents for small businesses.

### **Panel Recommendation changes**

Modification to remove the need for boroughs to impose a planning condition on new hot food takeaway (A5) uses to achieve the standards of the Healthier Catering Commitment.

This recommendation has been accepted with amendments to encourage boroughs to advocate the uptake of the Healthier Catering Commitment by new A5 operators.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 10: Economic competitiveness and employment

The deletion of Part E that requires large scale commercial development to support the provision of small scale retail, mean that small-scale commercial space may not always come forward alongside all proposals for large-scale developments. The insertion of Part B 3, however, should ensure that boroughs set policies in Local Plans that require small-scale commercial units, and as a consequence these should come forward as appropriate and as necessary. There may be a minor negative impact for this objective in the short term due to the need for boroughs to draw up appropriate policies. In the medium and long term, there may be either no impact or in some instances there may be a minor positive impact as boroughs draw up more specific and relevant requirements for their areas in Local Plans.

This would not alter the overall scoring in the SEA matrix

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

### Panel Recommendation changes

Objective 3: Health and Health Inequalities

The changes to E9B in light of the Panel Recommendation and the subsequent amendments would likely result in fewer A5 operators achieving the standards of the Healthier Catering Commitment. Assessing this in

isolation, this may result in a minor negative impact on this objective. However, the policy overall would have a positive impact which is currently reflected in the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 3: Health and health inequalities

The changes to E9B in light of the Panel Recommendation and the subsequent amendments would likely result in fewer A5 operators achieving the standards of the Healthier Catering Commitment. London has the highest level of childhood overweight and obesity in England. Obesity is more common among certain ethnic groups in London, including those from Black and Asian children specifically Pakistani and Bangladeshi children. This objective seeks to reduce the differentials in life expectancy and healthy life expectancy across London and reduce inequalities in physical and mental health and wellbeing.

Assessing this in isolation, this change may result in a minor negative impact on the health of younger people and those from Black and Asian groups. However, the policy overall would still have a positive impact which is currently reflected in the matrix.

Chapter: 6 Economy	Policy: E10 Visitor Accommodation

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification setting out that serviced accommodation should be provided in accordance with the sequential test and reference to a complementary policy – no material change.

Deletion of Part F of the policy which removes reference to apart-hotels and short-term lettings as specific types of accommodation.

Insertion of footnotes to provide further clarity regarding the British Standards to be implemented when planning for accessible serviced accommodation – no material change

References in the supporting text:

 Deletion of reference to short-term lets and apart-hotels and the use of student accommodation to meet seasonal fluctuations outside of term time.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10: Economic competitiveness and employment

Deleting the reference to apart-hotels could be considered as a negative impact on the economy in terms of the support this type of accommodation affords to business and tourism in the capital, helping to maintain London as an internationally competitive city – however the thrust of the policy is maintained in ensuring the need for visitor accommodation is met and that it meets all standards – no change to the SEA matrix.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

N/A

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

No impact

b. If yes, summarise the impact on the protected characteristic(s).

# Chapter 7 Heritage and Culture

**Chapter:** 7 Heritage and Culture **Policy:** HC1 Heritage conservation and growth

### 1. Initial assessment:

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Addition of reference to:

- local communities and relevant organisations to the list of stakeholders boroughs should consult when an evidence base to reflect an understanding of London's historic environment in Part A
- London's Parks and Gardens Trust, and The Royal Parks to the list of stakeholders who planners and developers should engage and collaborate with.
- Revealing and displaying archaeological remains as one of the ways that heritage assets can be creatively re-used and contribute to urban renewal.

Correction made in supporting paragraph 7.1.2 to the reference to significant trees from aged to ancient to reflect accepted terminology.

Cross references made to Policy D1 to further strengthen the link between the two policies in paragraphs 7.1.5 and 7.1.6.

Figure 7.5 - Archaeological Priority Areas and Registered Battlefield updated.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• Clarifying/strengthening the link between policy HC1 and policy D1 and identifying additional relevant stakeholders in the planning process will help to ensure the best and most efficient use of land so as to support sustainable patterns and forms of development. This likely to have an indirect positive impact in the short term (+), medium term (+) and long term (+) on a permanent basis and relevant Locally and Greater London. Matrix to be updated to reflect this.

### Objective 7 Design

- Encouraging engagement with a wide range of relevant stakeholders will help to ensure new buildings and spaces are appropriately designed. This will likely help to ensure that future development contributes to the promotion and enhancement of the existing sense of place and distinctiveness in the area as these stakeholders can inform and contribute to a more detailed and enhanced understanding of the local historic environment.
- Requiring that future growth is based on a clear understanding of London's historic environment and encouraging the creative re-use of heritage assets such as archaeological remains will help to conserve and enhance townscape/cityscape character.
- Strengthening the link between the design and heritage policies will help to promote high quality design, improve the wider built environment and create a sense of place and vibrancy.

Overall these impacts are already reflected in the matrix as being likely to have a direct permanent positive impact in the short term (+), medium term (++) and long term (++) and is relevant Locally, for Greater London and for the wider region.

Objective 20 Natural Capital and Natural Environment

• Encouraging boroughs and developers to consultant and engage with local communities and other relevant stakeholders including London's Parks and Gardens Trust and The Royal Parks from early in the planning process will help to protect, connect and enhance London's natural capital by highlighting potential harm to sites early on so that it can be better addressed and/or mitigated. This impact is likely to have a direct positive permanent impact in the short term (+), medium term (+)

and long term (+) and is relevant Locally and for Greater London. Matrix to be updated to reflect this.

### Objective 21 Historic Environment

- Encouraging boroughs and developers to consultant and engage with all relevant stakeholders
  including local communities, relevant organisations, London's Parks and Gardens Trust and The
  Royal Parks early in the planning process is likely to help to conserve and/or enhance heritage
  assets, their setting and the wider historic environment.
- Strengthening the link between design and heritage policies and requiring that boroughs and developers actively engage with relevant stakeholders during plan-making and decision taking is likely to help improve the quality and condition of the historic environment by ensuring that future development takes account of heritage, which is likely to positively contribute to respecting, maintaining and strengthening local character and distinctiveness.
- Requiring that future growth is based on a clear understanding of London's historic environment and encouraging the creative re-use of heritage assets such as archaeological remains will contribute to the better management of heritage assets and tackle heritage at risk.

Overall these impacts are likely to have an indirect permanent positive impact in the short term (+), medium term (++) and long term (++) and is relevant Locally, for Greater London and for the wider region. Matrix to be updated to reflect this

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 21 Historic Environment

- Encouraging boroughs and developers to consultant and actively engage with all relevant stakeholders including local communities early in the planning process will increase the social benefit derived from the historic environment by getting more people to actively participate in determining what future growth in their local area is likely to look like.
- Requiring future growth to be based on a clear understanding of London's historic environment, and
  encouraging the creative re-use of heritage assets such as archaeological remains is likely to help
  encourage participation and provide educational opportunities thereby increasing the social benefit
  derived from the historic environment

Overall these impacts are already reflected in the matrix as being likely to have a direct positive impact in the short term (+), medium term (+) and long term (++) on a permanent basis and relevant Locally, for Greater London and for the wider region.

### 4. CSIA (Community Safety Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

Yes, for: disability, religion, race, age.

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• Recognising that local communities provide a valuable source of information in understanding the value of the historic environment and how it contributes to the character and identity of a place could represent positive impacts by ensuring that the cultural heritage of specific groups who share

- the protected characteristic of religion or belief is recognised and protected. This could include heritage assets such as places of worship.
- Requiring that boroughs and developers engage and consult with all relevant stakeholders including
  the local community early in the planning process will mean that potential impacts of development
  on people or groups who would come under one of the protected characteristics are considered and
  they are involved in planning decisions that affect them. By identifying and understanding how
  places and buildings are valued by particular groups, for example, those with religious or other
  beliefs, BAME and LGBT communities as well as the wider community, can help to ensure that plans
  for the future development of an area recognises their importance and utilise them in placemaking,
  which could have a positive impact for these groups.

Overall this likely to have an indirect permanent positive impact in the short term (+), medium term (+) and long term (+) and is relevant Locally and for Greater London. Matrix to be updated to reflect this.

### Objective 7 Design

• Strengthening the link between the design and heritage policies is likely to help to make people feel positive about the area they live in and promote social integration by ensuring new buildings and spaces are appropriately designed that promote and enhance a sense of place and distinctiveness. Working alongside D1, Policy HC1 requires boroughs to develop an understanding of the value of the historic environment, recognising that local communities provide a valuable source of information in understanding as to the value of the historic environment and how it contributes to the character and identity of a place. The policies explicitly recognise the influence of past human cultural activity from all sections of London's diverse community. This may have a positive impact on some specific religious or belief groups, BAME or LGBT communities by ensuring that their cultural heritage is recognised and protected. This likely to have an indirect permanent positive impact in the short term (+), medium term (+) and long term (+) and is relevant Locally and for Greater London. Matrix to be updated to reflect this.

### Objective 21 Historic Environment

- Encouraging early engagement with the local community who come under a protected characteristic,
  for example religion or belief, or race will help boroughs to develop an increased understanding of
  the historic environment that includes the identification of culturally key features and areas. This
  understanding can then be used as part of a robust evidence base on which to bring forward
  heritage-led growth. This could be relevant for groups such as BAME Londoners, and members of
  the LGBT community, and could represent positive impacts by ensuring that the cultural heritage of
  specific groups is recognised and protected.
- The policy requires that future growth is based on a clear understanding of London's historic environment and suggesting specific examples of the types of opportunities London's historic environment offers for urban renewal projects such as the revealing and displaying of archaeological remains. Aligned with Policy D3, this will particularly benefit disabled people, older people and those with very young children by improving access for these groups to the heritage environment in general and heritage assets in particular. As well as physical access, the policy also focusses on the interpretation of heritage assets to make them more accessible to the wider public, recognising that this may need to be presented in different ways. This will particularly benefit disabled people with sensory impairments, some neurodiverse conditions and learning difficulties.

Overall these impacts are likely to have an indirect or direct permanent positive impact in the short term (+), medium term (+) and long term (+) and is relevant Locally, for Greater London and for the wider region. Matrix to be updated to reflect this.

### **HC1** Heritage

IIA Element												IIA Obi	jectives	<u> </u>										$\neg$
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																			ı	1		1		
Short Term						+	+		n/a	+	+	0	+	0/+	+	0/+	0	0	n/a	+	+	n/a	?	0
Medium Term						+	++		n/a	+	+	+	+	+	+	+	0	0	n/a	+	++	n/a	?	+
Long Term						+	++		n/a	+	+	+	+	+	+	+	+	+	n/a	+	++	n/a	?	+
Direct / Indirect						I	D		n/a	ı	D	I/D	I/D	I	I/D	I	I/D	ı	n/a	D	I	n/a	I	I
Temporary / Permanent						Р	Р		n/a	T/P	T/P	T/P	T/P	Р	Р	Р	T/P	T/P	n/a	Р	Р	n/a	T/P	T/P
Local / Greater London / Wider Region / Global						L/G L	L/G L/ W		n/a	L/G L/ W	L/G L/ W	L/G L/ W	L/G L/ W	L/G L	L/G L	L	L	L	n/a	L/G L	L/G L/ W	n/a	L	L
EQIA					•																			
Short Term	+	+	n/a	+	0	+	+	n/a	n/a	+	n/a	0	+	0/+	+		n/a	n/a	n/a	0	+	n/a	n/a	0
Medium Term	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+		n/a	n/a	n/a	+	+	n/a	n/a	+
Long Term	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+	ı	n/a	n/a	n/a	+	+	n/a	n/a	+
Direct / Indirect	- 1	I/D	n/a	I	I	I/D	I	n/a	n/a	I/D	n/a	I/D	I/D	I	I/D		n/a	n/a	n/a	ı	I/D	n/a	n/a	I
Temporary / Permanent	Р	T/P	n/a	T/P	T/P	T/P	Р	n/a	n/a	Р	n/a	T/P	T/P	Р	T/P		n/a	n/a	n/a	Р	Р	n/a	n/a	Р
Local / Greater London / Wider Region / Global	L/G L	L/G L	n/a	L	L/G L/ W	L/G L/ W	L/G L	n/a	n/a	L/G L	n/a	L/G L	L/G L	L/G L	L/G L		n/a	n/a	n/a	L	L/G L/ W	n/a	n/a	L
HIA			•		•				,						•						,	•		
Short Term	+	+	+		+				n/a	?				0/+	+		n/a	0		0	+	n/a		0
Medium Term	+	+	+		+				n/a	?				+	+		n/a	0		+	+	n/a		+
Long Term	+	+	+		+				n/a	?				+	+		n/a	+		+	++	n/a		+
Direct / Indirect	D	I/D	I/D		D				n/a	ı				ı	ı		n/a	ı		1	D	n/a		I
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	Р				Р	Р		n/a	T/P		Р	P	n/a		T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		L/G L				n/a	L				L	L/G L		n/a	L		L	L/G L/ W	n/a		L
CSIA																								
Short Term				+					n/a															
Medium Term				0					n/a															
Long Term				0					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				Т					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

### Objectives

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 7 Heritage and Culture	<b>Policy:</b> HC3 Strategic and Local Views

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Removal of the word 'important' in relation to local views to.

Amendment of wording to paragraph 7.3.1 to clarify that development should be resisted if it is likely to compromise the setting or visibility of a key landmark.

Update to figure reference in 7.3.1. No material change.

Clarification of the role of the LVMF SPG – no material change.

Insertion of additional explanatory text to clarify that local views should be managed using a similar framework as that for Strategic views.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

### Objective 7 Design

• Views (both local and strategic and which can include within them key landmarks) can make an important contribution to townscape/cityscape character. Therefore clarifying how views should be managed and that development should be resisted if it is likely to compromise the setting or visibility of a key landmark will help to ensure that new buildings and spaces are designed to be sensitive to views and it is likely that this design approach will promote and enhance existing a sense of place and distinctiveness. These impacts are already reflected in the Matrix as being likely to have a direct significant positive impact in the short (++), medium (++) and long (++) term on a permanent basis for London, Greater London, and for the wider region.

### Objective 20 Natural Environment

• Clarifying how local views should be managed and when they should be managed using a similar framework as that for Strategic views could have the positive impact of helping to protect and enhance the character of local greenscapes and/or riverscapes, if areas of this nature are captured in/form part of a local view. This impact is already reflected in the matrix as being likely to have a direct positive impact in the short (+), medium (+) and long (+) term on a permanent basis for London and Greater London.

### Objective 21 Historic Environment

• The clarification that the policy to apply to all identified local views and providing additional guidance to boroughs around the identification of local views is likely to positively contribute to improving the quality and condition of the historic environment. This likely to have an indirect positive impact in the short term (+), medium term (+) and long term (++) on a permanent basis and relevant Locally and for Greater London. Matrix to be updated to reflect this.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

### Objective 21 Historic Environment

• Local views contribute to local character and distinctiveness and help to create places that are valued by the local community and that people want to spend time in. Ensuring that identified local views are protected and managed in a similar manner as Strategic Views will increase the social benefit

derived from the historic environment in relation to well-being by ensuring that these valued elements of a local area are protected and respected. This likely to have an indirect positive impact in the short term (+), medium term (+) and long term (+) on a permanent basis and relevant Locally. Matrix to be updated to reflect this.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/A

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

Yes for: religion or belief

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 21 Historic Environment

• The policy encourages boroughs to clearly identify local views in Local Plans and strategies and provides additional guidance about how this can be done, as well as clarifying the level of protection that should be given to identified local views, will contribute to the development of a robust evidence base around the character and context of a borough's local area and help to ensure that future growth is based on a clear understanding of London's historic environment. Identified local views can include within them landmarks that make aesthetic, historic, cultural or other contributions to the view. These landmarks could be of particular importance to specific groups as part of their cultural heritage. For example, if a place of worship is identified as a landmark within a local view the protection of this view could represent a positive impact for some people who share the protected characteristic of religion or belief. This likely to have an indirect positive impact in the short term (+), medium term (+) and long term (+) on a permanent basis and relevant Locally, for Greater London and for the Wider Region. Matrix to be updated to reflect this.

### **HC3 Strategic and Local Views**

IIA Element		IIA Objectives																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	++		?	+	+	n/a	+	0	n/a	n/a	n/a	n/a	0	+	+	n/a	n/a	0
Medium Term						n/a	++		?	+	+	n/a	+	0	n/a	n/a	n/a	n/a	0	+	+	n/a	n/a	0
Long Term						n/a	++		?	+	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	++	n/a	n/a	+
Temporary / Permanent						n/a	D		ı	D	I/D	n/a	D	ı	n/a	n/a	n/a	n/a	ı	D	1	n/a	n/a	ı
Direct / Indirect						n/a	Р		Р	Р	Р	n/a	Р	T/P	n/a	n/a	n/a	n/a	T/P	Р	Р	n/a	n/a	Р
Local / Greater London / Wider Region / Global						n/a	L/G L/ W		L/G L	L/G L/ W	L/G L/ W	n/a	L/G L	L	n/a	n/a	n/a	n/a	L/G L	L/G L	L/G L	n/a	n/a	L
EQIA	•	•			,	•	•	•	,	'	•	•		•	,		•			,	•	•		
Short Term	+	0	n/a	n/a	n/a	0	+	n/a	n/a	n/a	n/a	n/a	+	0	n/a		n/a	n/a	0	n/a	+	n/a	n/a	0
Medium Term	+	+	n/a	n/a	n/a	0	+	n/a	n/a	n/a	n/a	n/a	+	0	n/a		n/a	n/a	0	n/a	+	n/a	n/a	+
Long Term	+	+	n/a	n/a	n/a	0	+	n/a	n/a	n/a	n/a	n/a	+	+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	+
Temporary / Permanent	I/D	I	n/a	n/a	n/a	D	I	n/a	n/a	n/a	n/a	n/a	I/D	I	n/a		n/a	n/a	I	n/a	ı	n/a	n/a	ı
Direct / Indirect	T/P	T/P	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a		n/a	n/a	T/P	n/a	Р	n/a	n/a	Р
Local / Greater London / Wider Region / Global	L/G L	L	n/a	n/a	n/a	L/G L/ W	L/G L/ W	n/a	n/a	n/a	n/a	n/a	L/G L	L/G L/ W	n/a		n/a	n/a	L/G L	n/a	L/G L/ W	n/a	n/a	L
HIA																								
Short Term	+	+	+		0				n/a	n/a				0	0		n/a	n/a		?	+	n/a		0
Medium Term	+	+	+		0				n/a	n/a				0	0		n/a	n/a		?	+	n/a		+
Long Term	++	+	+		0				n/a	n/a				+	+		n/a	n/a		?	+	n/a		+
Temporary / Permanent	D	D	D		D				n/a	n/a				ı	ı		n/a	n/a		-	1	n/a		1
Direct / Indirect	T/P	T/P	T/P		T/P				n/a	n/a				T/P	T/P		n/a	n/a		T/P	Р	n/a		Р
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		L/G L/ W				n/a	n/a				L	L		n/a	n/a		L/G L	L	n/a		L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and

Chapter: 7 Heritage and Culture	<b>Policy:</b> HC5 Supporting London's culture and creative
	industries

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Re-phrased Part A and Part C (3) to improve readability. No material change.

References in supporting text:

Re-phrased supporting text 7.5.13 to improve readability. No material change

### 1.b Panel Recommendations

Restructured Part A to insert the first paragraph of supporting text 7.5.4 in the policy as requested by the panel in recommendation PR34.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Restructuring the policy to clarify that boroughs are encouraged to develop an understanding of the
existing cultural offer in their areas to evaluate what is unique and important to residents, workers
and visitors and to use this understanding to develop policies to protect those cultural assets and
community spaces is likely to help safeguard London's cultural offer by sustaining and strengthening
what is important and unique. This is likely to have minor positive impacts in the short term and
significantly positive impacts in the longer term, the matrix already reflects this.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No Impacts

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

- EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?

Yes, sex, sexual orientation and race.

b. If yes, summarise the impact on the protected characteristic(s).

### **Objective 13 Culture**

• Restructuring the policy to clarify that boroughs are encouraged to develop an understanding of the existing cultural offer in their areas to evaluate what is unique and important to residents, workers and visitors and to use this understanding to develop policies to protect those cultural assets and community spaces is likely to help safeguard London's cultural offer by sustaining and strengthening what is important and unique to local communities. This is likely to help secure and protect more cultural venues and facilities that are important to LGBTQ+ people and those catering to women and

BAME people who have been disproportionately vulnerable to closure in London<sup>1</sup>, by ensuring boroughs develop an understanding of their importance and to reflect this in their policy and decision making. This is likely to have minor positive impacts in the short term and significantly positive impacts in the longer term, the matrix already reflects this.

<sup>&</sup>lt;sup>1</sup> UCL Urban Laboratory (2017) LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006-present.

Chapter: 7 Heritage and Culture	<b>Policy:</b> HC6 Supporting the night-time economy

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification that the night-time economy should be promoted in town centres where public transport such as the Night Tube and Night Buses are available - no material change

Inclusion of 'neighbouring boroughs' to make explicit that boroughs should co-operate in the management of the night-time economy.

References in the supporting text:

Policy G6 Biodiversity and access to nature is referenced to make clear the link to noise and light
pollution on local wildlife – no material change as it is already a requirement of the Plan and would
be assessed under that policy G6.

### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

N/A

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

N/A

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

N/A

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 1: Equality and inclusion

Requiring co-operation between neighbouring boroughs (with the inclusion of 'neighbouring boroughs') might impact those with certain protected characteristics that live in the area. This objective seeks to make London a fair and inclusive city, providing opportunities for Londoners to actively participate in the city's life, decision making and communities. The extent to which this may have an impact and the groups or individuals that may be impacted would entirely depend on local circumstances.

<b>Chapter:</b> 7 Heritage and Culture	<b>Policy:</b> HC7 Protecting Public Houses											
1. Initial assessment:												
a. brief summary of extent of changes and whe the policy	ther the change is already reflected somewhere in											
Clarification that the policy should be implemented town centre strategies and planning decisions. This change.	by boroughs through Development Plan Documents, was implied in the policy as previously drafted – no											
<ul> <li>References in supporting text:         <ul> <li>Clarification that where the loss of a pub is acceptable, consideration should be given to the replacement of an existing public house as part of redevelopment or regeneration schemes – no material change</li> <li>Resist proposals that would compromise the operation or viability of a public house, and where this would not occur, developers must put in place mitigation measures – this approach is explicit within the wording of the policy, with the supporting text providing clarity – no material change</li> </ul> </li> </ul>												
2. SEA (Strategic Environmental Assessment)												
2a. are the changes likely to have an impact on	any of the objectives with SEA guide questions?											
N/A												
3. HIA (Health Impact Assessment)												
3a. are the changes likely to have an impact on	any of the objectives with HIA guide questions?											
N/A												
4. CSIA (Community Safety Impact Assessmen	t)											
4a. are the changes likely to have an impact on	any of the objectives with CSIA guide questions?											
N/A												
5. EqIA - Equality Impact Assessment												

a. are the changes likely to have an impact on one or more protected characteristics?

b. If yes, summarise the impact on the protected characteristic(s).

N/A

# Chapter 8 Green Infrastructure and Natural Environment

icy: G1 Green Infrastructure

### a. brief summary of extent of changes

Addition of reference to enhancing as well as protecting green infrastructure, deletion of specific references to green infrastructure (GI) measures in part A, examples of GI measures are already covered in supporting text paragraph 8.1.1.

Some minor restructuring and clarifications/amended terms – no substantive change

In parts B and C - greater focus on the multiple benefits of and integrated approach to GI, including strengthened emphasis on the use of evidence in green infrastructure strategies to guide interventions.

Further explanation about how this policy works with other policies in the chapter.

### 2. SEA (Strategic Environmental Assessment)

### a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 – Design

• The changes promote the consideration of green infrastructure in an integrated and holistic way; alongside other policies in the plan such as those which promote active travel, this can further help to create and maintain a safe and attractive public realm which encourages people to walk and cycle. Depending on how enhancements to green infrastructure are implemented at the local level, the policy can also help to improve the wider built environment and create a sense of place and 'vibrancy'. This is likely to have positive impacts in the short, medium and longer term.

No change to the matrix.

Objective 20 - Natural Capital and Natural Environment

• The changes emphasise the policy's intent to protect and enhance the character of local greenscapes through considering, assessing and planning for green infrastructure in an integrated way. This is likely to have positive impacts in the short term and significant positive impacts in the medium and longer term.

No change to the matrix.

### 3. HIA (Health Impact Assessment)

### a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 20 - Natural Capital and Natural Environment

• The changes to the policy strengthen the policy's aim to protect and enhance green infrastructure; alongside other policies such as G6, and dependent on how the policy is implemented locally, this can help to bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest. This is likely to have positive impacts in the short and medium and significant positive impacts in the longer term.

### 4. CSIA (Community Safety Impact Assessment)

a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 3 Health and Health Inequalities

• Greater emphasises on enhancing as well as protecting green infrastructure will help to ensure existing green infrastructure is improved which may help to reduce inequalities in physical and mental health and wellbeing by providing greater opportunities for people to access these types of spaces. The strengthening of reference to evidence in green infrastructure strategies could help to identify priorities for GI measures and projects which could benefit particular groups. These changes could be particularly beneficial for young people, as London's young people are less likely to regularly visit a park or green space than elsewhere in England, this is especially so for BAME children and those from lower income households<sup>1</sup>. This is likely to have positive impacts in the short and medium and significant positive impacts in the longer term.

No changes to the matrix.

Objective 14 Air quality

• The greater emphasis on the multiple benefits of GI should improve how GI is considered alongside other policies in the plan and can help to maximise benefits under a range of policy objectives. Planning green infrastructure with other methods to reduce exposure to poor air quality in accordance with policy SI1 can help reduce inequalities in terms of access to clean air. People living in places with high proportions of some BAME groups are more likely to be exposed to above EU-limit NO2 concentrations than those in predominantly white areas<sup>2</sup>. This is likely to have positive impacts in the medium and longer term.

No changes to the matrix.

Objective 15 Climate change adaptation and mitigation

• The increased emphasis on considering green infrastructure in an integrated way, in combination with other policies in the plan can help to mitigate the effects of climate change. For instance, considering green infrastructure alongside SI4 can further help to reduce the impacts of the heat island effect and health risk associated with overheating. This may have a particular positive impacts for children, older people and disabled people or those with chronic illnesses who can be more at risk from the effects of severe weather associated with climate change, such as heat-waves<sup>3</sup>. This is likely to have positive impacts in the medium and longer term.

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

• The changes help to ensure the integrated consideration, planning and enhancement of green infrastructure alongside other policies in the plan such as those relating to inclusive design, open

<sup>&</sup>lt;sup>1</sup> The Mayor's equality, diversity and inclusion strategy, 2018

<sup>&</sup>lt;sup>2</sup> The Mayor's equality, diversity and inclusion strategy, 2018

<sup>&</sup>lt;sup>3</sup> World Health Organisation 2017, protecting health in Europe from climate change

space and play. E.g. enhancements to the quality of GI could contribute to new or improved green spaces that are safe and accessible to all. This could include sensory environments and play spaces dependent on the specific local implementation. The changes can be particularly beneficial for young people, as London's young people are less likely to regularly visit a park or green space than elsewhere in England, this is especially so for BAME children and those from lower income households<sup>4</sup>. This is likely to have positive impacts in the short and medium and significant positive impacts in the longer term.

<sup>&</sup>lt;sup>4</sup> The Mayor's equality, diversity and inclusion strategy, 2018

Chapter: 8 Green Infrastructure and Natural	Policy: G2 London's Green Belt
Environment	

## a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Insertion of 'beneficial' to the policy text dealing with Green Belt enhancement to reinforce the policy intention to promote appropriate multi-functional uses of Green Belt.

Minor change to footnote to remove specific paragraph references to ensure that NPPF references remain up-to-date

### 2. SEA (Strategic Environmental Assessment)

### a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 20 Natural Capital and Natural Environment

• The change to emphasise beneficial use of the green belt such as greater sport and recreation uses and food growing can help to protect and enhance the character of local greenscapes, help to acknowledge monetary value to natural capital of London as well as helping to conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network, dependent on how the policy is implemented at the local level. This is likely to have positive impacts in the medium and longer term.

No changes to the matrix.

### 3. HIA (Health Impact Assessment)

### a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion

• The change to emphasise beneficial use of the green belt such as greater sport and recreation uses and food growing can help to provide opportunities for people to choose an active, fulfilling life, dependent on how the policy is implemented at a local level. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 3 Health and Health Inequalities

• The increased emphasis on promoting beneficial use of the green belt, alongside other policies in the plan, can help to: promote increases in physical activity, particularly in areas of health and social deprivation; reduce inequalities in levels of physical activity; improve the physical and mental health and wellbeing of communities; and support the provision of quality, affordable and healthy food. The effect of this change will be dependent on how the policy is implemented at a local level and the specific enhancement projects or developments that are undertaken. This is likely to have positive impacts in the short, medium and longer term.

### Objective 20 - Natural Capital and Natural Environment

• The changes to the policy strengthen the policy's aim to enhance beneficial green belt uses; alongside other policies such as G6, and dependent on how the policy is implemented locally, this can help to bring nature closer to people, particularly in most urbanised parts of the city thereby improving access to areas of biodiversity interest. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?b. If yes, summarise the impact on the protected characteristic(s).

Objective 3 Health and Health Inequalities

• The additional wording which more explicitly supports beneficial multifunctional uses of green belt such as sport and recreation has the potential to further promote opportunities to reduce inequalities in physical and mental health and well-being. This could represent a positive impact for children who are less likely to regularly visit a park or green space than elsewhere in England, this is especially so for BAME children and those from lower income households<sup>1</sup>, however this will be dependent on the proposals and specific projects brought forward. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

• The more explicit support for beneficial multifunctional uses of green belt has the potential, alongside other policies in the plan, to promote the enjoyment and benefits of the natural environment and promote greater accessibility to green spaces. This may have a particular positive impact on young people, as children in London visit green spaces less than in other parts of England, with this being more likely for BAME children and those from lower income households<sup>2</sup>. Any direct impact will be dependent on the proposals and specific projects brought forward. This is likely to have positive impacts in the short, medium and longer term.

<sup>&</sup>lt;sup>1</sup> The Mayor's equality, diversity and inclusion strategy, 2018

<sup>&</sup>lt;sup>2</sup> The Mayor's equality, diversity and inclusion strategy, 2018

Chapter: 8 Green Infrastructure and Natural	Policy: G3 Metropolitan Open Land
Environment	

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification that the same protections apply to Metropolitan Open Land (MOL) as to Green Belt

Reordering of text around applying national policy tests to MOL and extending MOL boundaries.

Addition of reference to demonstrating exceptional circumstances in cases where MOL boundaries are changed and ensuring this is fully evidenced and justified.

Removal of reference to land swaps in the supporting text.

### 1.b Panel Recommendations

Following the Panel's recommendation, it is proposed to add supporting text that deals with changes to MOL boundaries from the waterways policies to the supporting text to policy G3. No other existing text is proposed to be altered. The additional text helps to cross reference the waterways policies and multifunctional use of the Thames in considering changes to MOL boundaries along the waterways. This is not considered to change the impacts on the objectives already identified both in relation to SI4 and G3.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

Reinforcing the aims of the policy by clarifying that MOL has equal status to Green Belt will help to
ensure the protection of MOL which can help to conserve and enhance the townscape and character,
and contribute to creating and maintaining a safe and attractive public realm which encourages
people to walk and cycle. This is likely to have a positive impact in the short, medium and longer
term.

Matrix to be updated.

Objective 20 Natural Capital and Natural Environment

• The further strengthening of the policy to protect MOL will help to ensure the protection and provision of open space can help to: protect and enhance the character of local greenscapes; conserve, enhance or create natural and semi-natural habitats of recognised ecological value (including the green corridors that link them); and enhance the ecological function and carrying capacity of the greenspace network. The effect of this change will be dependent on how the policy is implemented at a local level and the specific enhancement projects or developments that are undertaken. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion

• The strengthening of protection for MOL will help to maintain and provide important open spaces which can provide opportunities for people to choose an active, fulfilling life, dependent on how the

policy is implemented at a local level. This is likely to be have positive impacts in the short, medium and longer term.

No changes to the matrix.

### Objective 3 Health and Health Inequalities

• Ensuring strong protection for MOL, alongside other policies in the plan, can help to promote increases in physical activity, particularly in areas of health and social deprivation, reduce inequalities in levels of physical activity, improve the physical and mental health and wellbeing of communities and support the provision of quality, affordable and healthy food. The effect of this change will be dependent on how the policy is implemented at a local level and the specific enhancement projects or developments that are undertaken. This is likely to have positive impacts in the short term and medium term and more significant positive impacts in the longer term.

No changes to the matrix.

### Objective 15 Climate change adaptation and mitigation

• Providing strong protection for MOL, will help to ensure important green spaces within urbanised areas; alongside other policies in the plan, this can help improve the micro-climate and ameliorate the impact of the heat island effect on Londoners. This is likely to be have positive impacts in the short, medium and longer term.

Matrix to be updated.

### Objective 20 - Natural Capital and Natural Environment

• The changes to strengthen the policy's aim to protect and enhance MOL, alongside other policies such as G6, and dependent on how the policy is implemented locally can help to specifically address deficiencies in access to open space and bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest. This is likely to have positive impacts in the short term and more significant positive impacts in the medium and longer term.

No changes to the matrix.

### Objective 24 Noise and vibration

The changes help to ensure strong protection for MOL, which has the potential to improve people's
access to quiet/ tranquil spaces. This is likely to have positive impacts in the medium and longer
term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

### b. If yes, summarise the impact on the protected characteristic(s).

### Objective 3 Health and Health Inequalities

• The additional wording which clarifies and strengthens protection for Metropolitan Open Land and supports its extension where appropriate has the potential to further promote opportunities to reduce inequalities in physical and mental health and well-being. This could represent in particular positive impacts for BAME children and those from lower income households who generally fare worse in terms of the quantity and quality of access to green space, however this will be dependent on the proposals and specific projects brought forward. (evidence from <a href="The Mayor's equality">The Mayor's equality</a>, diversity and inclusion strategy). This is likely to have positive impacts in the short term and more significant positive impacts in the medium and longer term.

No changes to the matrix.

### Objective 20 Natural Capital and Natural Environment

• The strengthened protection for MOL has the potential to promote the enjoyment and benefits of the natural environment and promote greater accessibility to green spaces. This could represent in particular positive impacts for young people, as children in London visit green spaces less than in other parts of England. this being more likely for BAME children and those from lower income households. Any direct impact will be dependent on the proposals and specific projects brought forward. (evidence from <a href="The Mayor's equality, diversity and inclusion strategy">This is likely to have positive impacts in the short and medium term and more significant positive impacts in the longer term.</a>

### **G3 Metropolitan Open Land**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA					1											i							Γ	1
Short Term						+	+		?/+	?	?/+	n/a	+	0	0	0	?	+	+	+	+	0	n/a	0
Medium Term						+	+		?/+	?	?/+	n/a	+	+	+	+	?	+	+	+	+	0	n/a	+
Long Term						+	+		?/+	?	?/+	n/a	+	+	+	+	?	+	+	++	+	0	n/a	+
Direct / Indirect						D	D		D	D	I	n/a	I	I	I/D	I	I	I	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						Р	T/P		Р	T/P	T/P	n/a	T/P	T/P	T/P	T/P	Т	T/P	T/P	Р	Р	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/G L	L/G L		L/G L	L/G L	L	n/a	L	L/G L	L	L/G L	L/G L	L/G L/ W	L	L/G L/ W	L/G L	L	n/a	L
EQIA						•																•		
Short Term	+	+	+	+	-/?	?	0	n/a	n/a	n/a	+	n/a	+	0	0		n/a	+	+	+	+	0	n/a	0
Medium Term	+	+	++	+	-/?	?	0	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	+	+	0	n/a	+
Long Term	+	+	++	+	-/?	?	+	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	++	+	+	n/a	+
Direct / Indirect	I/D	I/D	I/D	I	I	I	I	n/a	n/a	n/a	I	n/a	-	I	I		n/a	I	I/D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	T/P	T/P	T/P		n/a	T/P	T/P	T/P	Р	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L/ W	L	L	L/G L	L	n/a	n/a	n/a	L	n/a	L	L/G L	L		n/a	L	L	L/G L/ W	L/G L/ W	L	n/a	L
HIA																								
Short Term	+	+	+		-/?				?	?				0	+		0	+		+	+	?		0
Medium Term	+	+	++		-/?				?	?				0	+		+	+		+	+	?		+
Long Term	+	+	++		-/?				?	?				+	+		+	+		++	+	?		+
Direct / Indirect	I/D	I/D	I/D		ı				D	D				ı	n/a		ı	1		D	I/D	D		D
Temporary / Permanent	T/P	T/P	T/P		T/P				Р	T/P				T/P	n/a		Т	T/P		T/P	Р	Р		T/P
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L/ W		L				L/G L	L/G L				L/G L	n/a		L/G L	L/G L/ W		L/G L/ W	L	L		L/G L/ W
CSIA																								
Short Term				+					0															
Medium Term				+					0															
Long Term				+					0															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/G L					L															

### Objectives

- 1. 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 8 Green Infrastructure and Natural	Policy: G4 Open space
Environment	

### a. brief summary of extent of changes

Clarifications to first part of the policy relating to needs assessments of open space so that they include "all" open space and take account quantity, quality and accessibility.

Additional text added to clarify that Development Plans include designations and policies to protect open space to meet needs not just address deficiencies.

Policy strengthened in relation to development proposals so that it is clear that development proposals should not result in the loss of open space rather than focusing protection on areas of deficiency.

The caveat for allowing losses outside of areas of deficiency subject to certain criteria has been removed.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• Strengthening the policy in terms of requiring development plans to include designations and policies to meet needs, rather than being focused on areas of deficiency will help to ensure the protection and provision of new open space and that open space is provided for locally. Through the creation of new spaces and the protection and enhancement of existing open spaces, this policy can help to create and maintain a safe and attractive public realm which encourages people to walk and cycle and help to improve the wider built environment and create a sense of place and 'vibrancy'. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### Objective 11 Infrastructure

• The clarifications and strengthening of policy concerned with assessing and meeting needs for open space can help contribute to the provision of environmental infrastructure to support housing delivery. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

• The further strengthening of the policy so that development proposals will not result in the loss of protected open space, and requiring development plans to include designations and policies to meet needs, rather than being focused on areas of deficiency will help to ensure the protection and provision of open space and that open space is provided for locally. This can help to promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all, create green spaces that are safe and accessible to all, promote sensory environments and play spaces, dependent on how the policy is implemented at the local level. This is likely to have positive impacts in the short and medium with more significant impacts in the longer term.

Matrix to be updated.

### 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion and Objective 2 Social Integration

• The changes help to provide a framework to the assessment, provision and protection of open space. The extent of benefits will depend on local circumstances; however, they can help to contribute to the provision of spaces which can assist with promoting physical activity, active travel and improving social integration. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 3 Health and Health Inequalities

• The further strengthening of the policy so that development proposals will not result in the loss of protected open space will also help to maintain access to and provision of open space in local areas, this can help to provide and protect spaces for sport, play and other recreation that can promote increases in physical activity, particularly in areas of health and social deprivation, reduce inequalities in levels of physical activity and improve the physical and mental health and wellbeing of communities. In combination with policy G8 and dependent on the local implementation of the policy, this can also help to support spaces for the provision of quality, affordable and healthy food. This is likely to have positive impacts in the short term and more significant positive impacts in the medium and longer term.

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

• The changes can help to strengthen the protection of open spaces and improve assessments of need to ensure adequate provision of open space in local areas. This will specifically help to address deficiencies in access to open space and in combination with Policy G6, has the potential to improve access to areas of biodiversity interest. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 24 Noise and vibration

• The further strengthening of the policy so that development proposals will not result in the loss of protected open space, and requiring development plans to include designations and policies to meet needs, rather than being focused on areas of deficiency will help to ensure the protection and provision of open space and that open space is provided for locally. This provides opportunities to improve people's access to quiet/ tranquil spaces dependent on local implementation of the policy. This is likely to have positive impacts in the medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

### **Objective 3 Health and Health Inequalities**

Through helping to providing a framework for boroughs to protect open space the changes will help to promote physical and mental health. With the different changes, the extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however it is likely to have a positive benefit s people or groups with protected characteristics. Through helping to protect and improve the quality of open space the changes can be particularly beneficial for young people, as London's young people are less likely to regularly visit a park or green space than elsewhere in England, this is especially so for Londons' BAME children and those from lower income households (evidence from The Mayor's equality, diversity and inclusion strategy). The changes include a greater focus on assessments to inform the protection and provision of open space to meet needs and address deficiencies. When considered alongside other policies such as D3, this can help to make green spaces more inclusive in their design and ensure that spaces can be used safely. Applying an inclusive design approach to open and green spaces can help to ensure they are convenient and welcoming with no disabling barriers. This can have a particular benefit for older people and disabled people This is likely to have positive impacts in the short term and more significant positive impacts in the medium and longer term. No changes to the matrix.

### **Objective 20 Natural Capital and Natural Environment**

The changes help to clarify that quantity, quality and access to open space should be considered in making assessments of open space. This should ensure local open space needs are properly assessed and protected and can help to create green spaces that are safe and accessible to all. This could include sensory environments and play spaces dependent on the specific local implementation. The changes can be particularly beneficial for young people, as London's young people are less likely to regularly visit a park or green space than elsewhere in England, this is especially so for London's BAME children and those from lower income households (evidence from <a href="The Mayor's equality, diversity and inclusion strategy">This is likely to have positive impacts in the short, medium and longer term.</a>

### **G4 Open Space**

Sex	IIA Element	IIA Objectives																							
Short Term		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Medium Term		1	ı	1					ı		ı		ı	ı	<u> </u>										
Long Term							+	+		+	n/a	+	n/a	n/a	0	0	0	0	+	+	+	+/?	0	n/a	+
Direct / Indirect	Medium Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Continue   Continue	Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Cocal / Greater London / Wider Region / Global   Cocal / Greater London / Wider Regi	Direct / Indirect						D	I/D		I/D	n/a	ı	n/a	n/a	1	I/D	_	I/D	I/D	I/D	I/D	I/D	I/D	n/a	ı
Wider Region / Global   W   V   V   V   V   V   V   V   V   V	Temporary / Permanent						Р	T/P		T/P	n/a	Р	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	Р	Р	T/P	n/a	T/P
Short Term	Wider Region / Global										n/a		n/a	n/a	L	L		L	GL	L	GL	GL	L	n/a	L
Medium Term         +         -         0         n/a         +         +         +         +         -         1/2         +         +         +         +         -         1/2         +         +         +         +         -         1/2         +         -         1/2         -         -         -         -         -	· ·																								
Long Term		+	+	+	?	-/?	+	+	+	+	n/a	+	n/a	+	0	0		n/a	+	+	+	+	0	n/a	0
Direct / Indirect    1		+	+	+	+	-/?	+	+	+	+	n/a	+	n/a	+	+	0		n/a	+	+	+	+	0	n/a	+
Temporary / Permanent	_	+	+	++	+	-/?	+	+	+	+	n/a	+	n/a	+	+	+		n/a	+	+	+	+	+	n/a	+
Cocal / Greater London /		ı	I/D	I/D	I	ı	D	L	ı	I/D	n/a	I/D	n/a	I/D	I	I/D		n/a	I	I/D	D	I/D	I/D	n/a	I
Wider Region / Global   GL   GL   GL   GL   GL   GL   GL   G		<u> </u>			T/P		Р			T/P	n/a	-	n/a		T/P	T/P		n/a		T/P			T/P	n/a	T/P
Short Term	Wider Region / Global	GL	GL	GL	L	GL	l	GL	GL		n/a	GL	n/a	GL	I			n/a	GL	L	GL	GL	L	n/a	L
Medium Term																									
Temporary / Permanent		+	+	+		-/?				?	?				0	n/a		0	+		+	+	?		0
Direct / Indirect		+	+	+		-/?				?	?				+	n/a		0	+		+	+	?		+
Temporary / Permanent		+	+	++		-/?				?	?				+	n/a		0	+		+	+	?		+
CSIA		I/D	I/D	I/D		I				D	I				I/D	n/a		I	1		D	I/D	D		D
Wider Region / Global         GL /W /W /W /W /W /W         GL /W <th< td=""><td></td><td></td><td></td><td></td><td></td><td>·</td><td></td><td></td><td></td><td>Р</td><td>Р</td><td></td><td></td><td></td><td>T/P</td><td>n/a</td><td></td><td>Т</td><td></td><td></td><td>Ĺ</td><td>Р</td><td>Р</td><td></td><td></td></th<>						·				Р	Р				T/P	n/a		Т			Ĺ	Р	Р		
Short Term         +         ?         —		GL	GL	GL		GL					L					n/a			GL		GL	L	L		GL
Medium Term         +         ?         — <td< td=""><td></td><td>•</td><td>•</td><td></td><td></td><td></td><td></td><td>•</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></td<>		•	•					•																	
Long Term         +         ?         -					+					?															
Direct / Indirect         D         D         D           Temporary / Permanent         T/P         T/P         T/P           Local / Greater London /         L/         L/         L/					+					?															
Temporary / Permanent					+					?															
Local / Greater London /					D					D															
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### Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 8 Green Infrastructure and Natural	Policy: G5 Urban Greening
Environment	

### a. brief summary of extent of changes

Reference added to the supporting text to note that achieving the urban greening policy can also help to meet other policy objectives.

New text added to ensure management and maintenance of green infrastructure is considered and secured through the planning process.

Additional text inserted to reference the variance of approaches to achieving the UGF for different development typologies and the fact there may be particular constraints for certain industrial typologies. Reference to forthcoming guidance added.

Minor changes to references for planting typologies.

### b. Panel Recommendations

The panel recommended removing the requirement for industrial development to comply with the 0.3 UGF target score for commercial development so that this would apply only to office development. The recommendations have been partly accepted and B2 and B8 used have been removed from the requirement to meet the target. The effect of this change is that some types of development will no longer be required to meet a target score which slightly reduces the scope and potential positive impacts of the policy. However, this typology makes up a small proportion of total development and these uses are still expected to incorporate greening measures, so the effect is minor and there is no significant change to the impacts on the objectives already identified.

### 2. SEA (Strategic Environmental Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 – Design

• Strengthening the relationship between G5 and other policies in the plan can further help in creating and maintaining a safe and attractive public realm which encourages people to walk and cycle and help to improve the wider built environment and create a sense of place and 'vibrancy', dependent on how specific greening measures are implemented. Ensuring the management and maintenance is considered and secured through planning is likely to contribute to improved design outcomes. This is likely to have positive impacts in the short and medium term with more significant positive impacts in the longer term.

Matrix updated.

Objective 20 - Natural Capital and Natural Environment

By reinforcing the connection between achieving the UGF target and other policy objectives, the
change can further help to protect and enhance the character of local greenscapes and conserve,
enhance or create natural and semi-natural habitats of recognised ecological value. This is likely
to have positive impacts in the short and medium term with more significant positive impacts in
the longer term.

### 3. HIA (Health Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 15 Climate change adaptation and mitigation

 By reinforcing how measures to achieve the UGF work alongside other policies in the plan, multiple benefits can be achieved, when considered with policy SI4 the incorporation of greening measures could help to improve the micro-climate and ameliorate the impact of the heat island effect on Londoners. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

### 5a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 14 Air quality

Considering the green infrastructure that is provided through implementation of the UGF alongside
other policies in the Plan can help to maximise benefits under a range of policy objectives. Planning
green infrastructure with other methods to reduce exposure to poor air quality in accordance with
policy SI1 can help reduce inequalities in terms of access to clean air. People living in places with
high levels of certain BAME groups are more likely to be exposed to above EU-limit NO2
concentrations than those in predominantly white areas. This is likely to have positive impacts in the
short, medium and longer term (evidence from <u>The Mayor's equality, diversity and inclusion</u>
strategy).

No changes to the matrix.

Objective 15 Climate change adaptation and mitigation

By reinforcing how measures to achieve the UGF work alongside other policies in the plan, multiple
benefits can be achieved, when considered with policy SI4 the incorporation of greening measures
could help to improve the micro-climate and ameliorate the impact of the heat island effect on
Londoners. This may have a particular positive impact on children, older people and disabled people
or those with chronic illnesses who can be more at risk from the effects of severe weather associated
with climate change, such as heat-waves (see para 2.8.3 This is likely to have positive impacts in the
short, medium and longer term

https://www.london.gov.uk/sites/default/files/nlp\_ex\_33c\_appendix\_3\_summary\_.pdf)

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

• The changes help to ensure the integrated consideration, planning and enhancement of green infrastructure, and could contribute to the creation of green spaces that are safe and accessible. This could include sensory environments and play spaces dependent on the specific local implementation. The changes can be particularly beneficial for young people, as London's young people are less likely

to regularly visit a park or green space than elsewhere in England, this is especially so for BAME children and those from lower income households This is likely to have positive impacts in the short and medium term with more significant positive impacts in the longer term. (evidence from The Mayor's equality, diversity and inclusion strategy).

### **G5 Urban Greening**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1			_		1							1		1							
Short Term						n/a	+		n/a	n/a	0	n/a	n/a	0	0	0	0	+	0	+	+/?	0	n/a	+
Medium Term						n/a	+		n/a	n/a	+	n/a	n/a	+	+	+	+	+	+	+	+/?	+	n/a	+
Long Term						n/a	++		n/a	n/a	+	n/a	n/a	+	+	+	+	+	+	++	+/?	+	n/a	+
Direct / Indirect						n/a	I/D		n/a	n/a	I/D	n/a	n/a	1	I/D	ı	I/D	I/D	I/D	D	D	I/D	n/a	1
Temporary / Permanent						n/a	T/P		n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	Р	Р	T/P	n/a	T/P
Local / Greater London /							L/G									1/6		L/G		L/G	L/G			
Wider Region / Global						n/a	L/ W		n/a	n/a	L	n/a	n/a	L	L	L/G L	L	L/ W	L	L/ W	L/ W	L	n/a	L
EQIA																								
Short Term	0	0	+	n/a	0	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	+	n/a	n/a	n/a	0
Medium Term	0	0	+	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	+	n/a	n/a	n/a	0
Long Term	+	+	++	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+		+	+	+	++	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	ı	D	ı	n/a	n/a	n/a	n/a	n/a	n/a	D	D		D	ı	D	D	n/a	n/a	n/a	ı
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	Р	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L/G L	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/G L		L/G L	L/G L/ W	L/G L	L/G L/ W	n/a	n/a	n/a	L
HIA		l					<u> </u>	<u> </u>		<u> </u>			<u> </u>						<u> </u>	<u> </u>				
Short Term	n/a	n/a	+		0				n/a	n/a				0	0		?	+		+	n/a	?		+
Medium Term	n/a	n/a	+		0				n/a	n/a				+	+		?	+		+	n/a	?		+
Long Term	n/a	n/a	++		+				n/a	n/a				+	+		?	+		++	n/a	?		+
Direct / Indirect	n/a	n/a	I/D		D				n/a	n/a				I	I		1	I		D	n/a	I		ı
Temporary / Permanent	n/a	n/a	T/P		Р				n/a	n/a				T/P	T/P		T/P	T/P		T/P	n/a	Р		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L/G L	L		L/G L	L/G L/ W		L/G L/ W	n/a	L/G L		L/G L/ W
CSIA										<u> </u>														
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

### Objectives

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 8 Green Infrastructure and Natural	<b>Policy:</b> G6 Biodiversity and access to nature
Environment	

### a. brief summary of extent of changes

Some restructuring of the policy and supporting text. Minor changes to terminology including adding reference to biodiversity 'net gain'. Insertion of text providing further clarification of how biodiversity net gain should apply to development and reference to forthcoming guidance.

Deletion of policy clause on avoiding harm to European Sites to remove unnecessary duplication of requirements set out in national legislation – no material change.

The supporting text was updated with additional text about appropriate assessment for European Sites in line with the recommendations of the HRA – no material change.

### 1.b Panel Recommendations

The panel recommended removing reference to biodiversity net gain in the mitigation hierarchy and replacing this with "equivalent or better biodiversity value where possible." This was partly accepted so that the text refers to "…better biodiversity value". While this changes the wording, the intention to secure improvements to biodiversity in the original text is maintained and there is no material change to the impacts on the objectives already identified.

### 2. SEA (Strategic Environmental Assessment)

### a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 20 - Natural Capital and Natural Environment

- Including strengthened wording in relation to the principle of biodiversity net gain can directly help to conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network. This is likely to have positive impacts in the short term with more significant positive impacts in the medium and longer term.
- While the policy wording in relation to European Sites has been removed, this is covered in separate legislation so has no material impact on the policy aim to avoid damage to sites, protected species and habitats, where there is a designation of international, national, regional or local importance. The updated Habitats Regulations Assessment screening report noted that the text referencing Imperative Reasons of Overriding Public Interest (IROPI) was only suggested to be included for information and its removal does not affect the conclusion of the HRA.

No changes to the matrix.

### 3. HIA (Health Impact Assessment)

### a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 20 - Natural Capital and Natural Environment

Clarification and greater emphasis on achieving biodiversity improvements through development
proposals can further help to bring nature closer to people, particularly in most urbanised parts of
the city and improve access to areas of biodiversity interest. This is likely to have positive impacts in
the medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 20 - Natural Capital and Natural Environment

Clarification and greater emphasis on achieving biodiversity improvements through development
proposals can further help to promote, educate and raise awareness of the enjoyment and
benefits of the natural environment. Better integrating biodiversity as part of development may
be particularly important for young Londoners who are less likely to regularly visit the natural
environment than elsewhere in England, this is especially so for BAME children and those from
lower income households (evidence from <a href="The Mayor's equality">The Mayor's equality</a>, diversity and inclusion strategy).
This is likely to have positive impacts in the medium and longer term.

Chapter: 8 Green Infrastructure and Natural	<b>Policy:</b> G7 Trees and woodlands
Environment	

### a. brief summary of extent of changes

Insertion of text to reference how green infrastructure strategies can be used identify optimal tree planting locations.

Minor updates to reference documents.

### 2. SEA (Strategic Environmental Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No impacts identified. No changes to the matrix.

### 3. HIA (Health Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

Objective 15 - Climate change adaptation and mitigation

• Strengthening the link between broader green infrastructure strategies and tree planting projects can help to maximise the multiple benefits trees can provide across policy areas. Trees can help to provide cooling, which could help to improve the micro-climate and ameliorate the impact of the heat island effect on Londoners, dependent on local implementation. This is likely to have positive impacts in the longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

### 5a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No changes. No impacts identified.

### 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

### b. If yes, summarise the impact on the protected characteristic(s).

Objective 15 - Climate change adaptation and mitigation

• Strengthening the link between broader green infrastructure strategies and tree planting projects can help to maximise the multiple benefits that trees can provide across policy areas. Trees can help to provide cooling, which can further help to reduce the impacts of the heat island effect and health risk associated with overheating which may have a particular positive impact on children and older people who can be more at risk from the effects of severe weather associated with climate change, such as heat-waves (see para 2.8.3

https://www.london.gov.uk/sites/default/files/nlp\_ex\_33c\_appendix\_3\_summary\_.pdf) The effects of this change are likely to be minor and are strongly dependent on local implementation. This is likely to have positive impacts in the medium term and more significant impacts in the longer term.

Chapter: 8 Green Infrastructure and Natural	Policy: G8 Food Growing
Environment	

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Policy text amended to encourage provision of space for urban agriculture and to identify potential sites for broader types of food growing beyond solely commercial food production.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 20 Natural capital and natural environment

• Support in the policy for identification of sites for a broader range of food growing could provide additional support for a wider variety of food growing activities and businesses and help to further acknowledge the natural capital of London. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 22 Geology and soils

• The further encouragement of urban agriculture has the potential to impact on soil degradation and erosion – this impact could be positive or negative dependent on the particular agricultural methods used.

Matrix to be updated.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and health inequalities

• Reinforcing the support for a broader range of food growing could help to support the provision of quality, affordable and healthy food which can help to reduce inequalities in health in communities. This is likely to have significant positive impacts in the medium and longer term.

No changes to the matrix.

Objective 20 Natural capital and natural environment

• Further encouragement of a broader range of food growing could help to bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest. This is likely to have positive impacts in the short, medium and longer term, however these impacts are dependent on the particular methods of agriculture used.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

### **G8 Food Growing**

IIA Element												IIA Obj	ectives	s										
=.00	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1																				
Short Term						+	+		n/a	+	n/a	+	n/a	0	0	0	n/a	n/a	+	+	n/a	+/?	n/a	+
Medium Term						+	+		n/a	+	n/a	+	n/a	+	0	0	n/a	n/a	+	+	n/a	+/?	n/a	+
Long Term						+	+		n/a	++	n/a	+	n/a	+	+	+	n/a	n/a	+	++	n/a	+/?	n/a	+
Direct / Indirect						I/D	I/D		n/a	I/D	n/a	I/D	n/a	ı	I/D	I	n/a	n/a	I/D	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	Р	n/a	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/G L	L/G L		n/a	L/G L	n/a	L/G L	n/a	L	L	L/G L	n/a	n/a	L/G L/ W	L/G L/ W	n/a	L/G L	n/a	L
EQIA																								
Short Term	n/a	+	+	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term	n/a	+	++	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term	n/a	+	++	n/a	+	+	+	?/+	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	++	n/a	+	n/a	n/a
Direct / Indirect	n/a	D	D	n/a	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	n/a	n/a	n/a		n/a	n/a	n/a	ı	n/a	I/D	n/a	n/a
Temporary / Permanent	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	L/G L/ W	L	n/a	L/G L	L/G L	L/G L	L/G L	n/a	L/G L	L/G L	L/G L	n/a	n/a	n/a		n/a	n/a	n/a	L/G L/ W	n/a	L/G L	n/a	n/a
HIA																					_			
Short Term	+	+	+		n/a				n/a	?				0	n/a		0	+		+	n/a	+		+
Medium Term	+	+	++		n/a				n/a	?				0	n/a		0	+		+	n/a	+		+
Long Term	+	+	++		n/a				n/a	?				+	n/a		0	+		+	n/a	+		+
Direct / Indirect	D	D	D		n/a				n/a	I/D				'	n/a		ı	D		ı	n/a	I/D		ı
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	T/P				T/P	n/a		Т	P		T/P	n/a	T/P		T/P
Local / Greater London / Wider Region / Global	L/G L/ W	L	L		n/a				n/a	L/G L				L	n/a		L/G L	L/G L/ W		L/G L/ W	n/a	L/G L		L/G L
CSIA																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					Р															
Local / Greater London / Wider Region / Global				L/G L					L/G L															

### Objectives

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# Chapter 9 Sustainable Infrastructure

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI1 Improving Air Quality

### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The way the policy applies to development plans and decisions has been disaggregated and clarified:

- Part A of the policy now applies specifically to plan making.
- Part B clarifies the minimum standards for development and the different ways in which they could be achieved. It is recognised that in some cases the measures identified to achieve the minimum standards may not always be enough; the proposed new structure of part B provides clarity in such situations. Additional clarification of such potential scenarios is also provided in paragraph 9.1.6B. Finally, section B 2 (d) of the policy has been re-worded to clarify the approach that should be taken to developments in Air Quality Focus Areas.

The approach to air quality positive has been clarified. New paragraphs 9.1.6C – 9.1.6H in the supporting text set out in more detail the steps that can be taken to achieve air quality positive.

Part E provides further detail about what is meant by reducing emissions in relation to AQN benchmarks/making the impact of development on local air quality acceptable as well as clarifying the approach to off-site mitigation measures.

Inclusion of a definition of existing poor air quality. Changes made to paragraph 9.1.1 clarify that the same weight should be given to WHO targets as legal limits.

Further clarification has been provided on the approach to Air Quality Neutral and Glossary has been updated.

Paragraphs 9.1.8A to 9.1.8C - clarification has been added that AQFAs do not undermine the role of AQMAs in planning decisions.

### 1.b Panel Recommendations

The Panel recommended a minor amendment to part A(2) (d) as it was considered reference to refusing recommendations which do not demonstrate measures was overly prescriptive. The revised text instead emphasises that proposals should demonstrate design measures to minimise exposure. The effect of the change is minor and is not considered to change the impacts on the objectives already identified.

### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• The clarification of the air quality positive approach highlights the importance of thinking about improvements to air quality as part of a wider design approach including in relation to transport networks and public spaces, and consideration of delivery of Healthy Streets indicators. This could help with encouraging active travel and reducing the need to travel through motorized transport. This is likely to have minor positive impacts in the short, medium and longer term although there are still some unknowns as to the impact on design from air quality positive approach.

Matrix to be updated.

### Objective 14 Air Quality

• The changes help to further clarify how air quality can be improved (e.g. through development plans and through an air quality positive approach) as well as how development proposals can help to tackle poor air quality, including in relation to legal limits and high levels of exposure. Clarifying Air

Quality Neutral applies to all development will also assist with this. This is likely to have positive impacts in the short term and more significant positive impacts in the medium and longer term.

Matrix to be updated

Objective 16 Climate change adaptation and mitigation

• Clarifying the importance of thinking about air quality in relation to design and transport, including Healthy Streets indicators, as part of the approach to air quality positive could help to support reductions in transport emissions. This is likely to have minor positive impacts in the short, medium and longer term.

No change to matrix required.

### 3. HIA (Health Impact Assessment)

### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and health inequalities

• The clarification of the approach in part B requires development proposals that are likely to be used by a large number of people particularly vulnerable to poor air quality to utilise design measures to minimise exposure which can help to address health issues associated with poor air quality. The clarification of the approach to air quality neutral applying to all developments alongside how air quality can be improved through an air quality positive approach can also help to deliver health improvements depending on local circumstances. This is likely to have minor positive impacts in the short, medium and longer term.

No change to matrix.

Objective 14 Air Quality

The changes help to further clarify how the air quality can be improved (e.g. through development
plans as well as through an air quality positive approach) as well as how development proposals can
help to tackle poor air quality, including in relation to legal limits and high levels of exposure.
Clarifying Air Quality Neutral applies to all development will also assist with this. This is likely to have
positive impacts in the short term and more significant positive impacts in the medium and longer
term.

Matrix to be updated

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

N/a

### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 3 Health and Health Inequalities and objective 14 Air Quality

People coming under certain protected characteristics are more likely to be disproportionately impacted by poor air quality including in relation to their health. The FSCs to SI1 could contribute towards making London a fairer, more inclusive city by helping reducing health inequalities as identified below:

- Age is an important factor in relation to peoples' susceptibility of the health effects of air pollution. Poor air quality can have particular impacts on children and older people (Updated Analysis of Air Pollution in London, Aether, February 2017). The clarification of the approach in part B to refuse applications that are likely to be used by a large number of people particularly vulnerable to poor air quality unless design measures have been used to minimise exposure can help to address health issues associated with poor air quality. The clarification of the approach to air quality neutral applying to all developments alongside how air quality can be improved through an air quality positive approach could also help to deliver health improvements depending on local circumstances.
- Poor air quality can result in negative impacts for women during pregnancy; affecting both mother and baby. Studies in London have shown that air pollution is having a detrimental impact upon babies' health before they are born and is directly attributable to low birth weight (BMJ, 2017, Impact of London's road traffic air and noise pollution on birth weight: retrospective population-based cohort study). The further clarification around the need to minimise exposure through design, applying AQN to all developments as well as providing further detail as to how air quality can be improved through an air quality positive approach may help to have a positive impact on women who are pregnant.
- Evidence on air quality suggests that places with higher levels of certain BAME communities can be
  more likely to be exposed to above EU-limit Nitrogen Dioxide (NO2) (Updated Analysis of Air
  Pollution in London, Aether, February 2017. The extent of benefits will be dependent on a number
  of factors, the additions and clarification to the policy however could provide positive impacts for
  members of certain BAME communities.

# **SI1 Air Quality**

IIA Element												IIA Obj	ectives	5										
07.1	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1								l	I	1								1	I		
Short Term						n/a	+/?		?	+	n/a	n/a	n/a	+	+	+	0	n/a	n/a	?	n/a	n/a	?	n/a
Medium Term						n/a	+/?		?	+	n/a	n/a	n/a	++	+	+	0	n/a	n/a	?	n/a	n/a	?	n/a
Long Term						n/a	+/?		?	++	n/a	n/a	n/a	++	+	+	0	n/a	n/a	?	n/a	n/a	?	n/a
Direct / Indirect						n/a	I/D		D	ı	n/a	n/a	n/a	D	D	D	I	n/a	n/a	1	n/a	n/a	ı	n/a
Temporary / Permanent						n/a	T/P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	Р	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	L/G L/ W		L	L/G L	n/a	n/a	n/a	L/G L/ W	L/G L/ W	L/G L/ W	L/G L	n/a	n/a	L/G L	n/a	n/a	L	n/a
EQIA																								
Short Term	?	?	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	0		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	++	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	++	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D		n/a	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	Р	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	n/a	L/G L	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/G L/ W		n/a	n/a	n/a	L/G L	n/a	n/a	n/a	n/a
HIA													,											
Short Term	+	+	+		n/a				n/a	n/a				+	0		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				++	0		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	++		n/a				n/a	n/a			'	++	0		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	ı	I	I		n/a				n/a	n/a				D	D		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				L/G L/ W	L/G L/ W		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarification of the meaning of 'zero-carbon' by inserting reference to the (existing) glossary definition.

Supporting text added to refer to the interim energy assessment guidance published since the MSC version of the plan and to note that this will be further updated once Building Regulations are updated. This provides further clarity on how carbon emissions should be calculated and should ensure more accurate reporting of carbon reductions as part of development proposals.

Further clarifying text has been added to the supporting paragraph on whole life carbon (WLC) to include dismantling and demolition and to signpost that the approach to the timing and content of WLC assessments will be set out in quidance.

A cross-reference to SI3 has been made in the supporting text to cover the design and specification standards for heat networks.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• The strengthening of whole life carbon scope and requirements should help to further promote high quality design and sustainable design and construction methods. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 10 Economic competitiveness and employment

• Clarification and strengthening of the approach to whole life carbon should help to promote new approaches to construction and demolition which could help to encourage and diversify that sector of the economy. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 16 Climate change adaptation and mitigation

• Providing further clarity on whole life carbon scope and requirements should strengthen the policy's overall effect of reducing the built environment's contribution to CO<sub>2</sub> emissions and further help to promote the transition to a low carbon economy. This is likely to have significant positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 23 Materials and waste

• Clarification and strengthening of the approach to whole life carbon should help to encourage more sustainable approaches to construction and demolition. This will help to keep materials at their highest value and promote the principles of the circular economy. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts identified.

No changes to the matrix.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

b. If yes, summarise the impact on the protected characteristic(s).

No impacts identified.

No changes to the matrix.

### SI2 Minimising greenhouse gas emissions

IIA Element												IIA Obj	ectives	5										-
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA								•				,	,					•						
Short Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	0	-	n/a	+	n/a
Medium Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	0	?	n/a	+	n/a
Long Term						?	+		?	+	+	n/a	n/a	+/?	++	++	++	n/a	n/a	+	?	n/a	+	n/a
Direct / Indirect						D	D		D	ı	ı	n/a	n/a	ı	D	D	D	n/a	n/a	D	D	n/a	D	n/a
Temporary / Permanent						Р	Р		T/P	Р	Р	n/a	n/a	T/P	T/P	Р	Р	n/a	n/a	Р	T/P	n/a	Р	n/a
Local / Greater London / Wider Region / Global						L	L		L/G L/ W	L	L	n/a	n/a	L/G L	w	L/G L	L/G L	n/a	n/a	w	L/G L	n/a	L/G L	n/a
EQIA								•																
Short Term	0	0	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	D	n/a	n/a	ı	n/a	n/a	n/a	n/a	ı	n/a	n/a	ı	ı		D	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	Т	n/a	n/a	T/P	n/a	n/a	n/a	n/a	Р	n/a	n/a	T/P	T/P		Р	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	L	n/a	n/a	L/G L	L/G L		L/G L	n/a	n/a	L/G L	n/a	n/a	n/a	n/a
HIA		1																						
Short Term	n/a	n/a	+		+				n/a	n/a				0	0		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				0	0		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				0	0		++	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		D				n/a	n/a				ı	ı		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	Т		Р				n/a	n/a				T/P	T/P		Р	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L	L/G L		L/G L	n/a		n/a	n/a	n/a		n/a
CSIA								1																
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI3 Energy Infrastructure

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Text added to clarify the circumstances in which energy masterplans should be developed and what they should include.

Clarification on the meaning of waste heat and low/ambient temperature heat networks.

Further explanation added on the circumstances in which Combined Heat and Power (CHP) may be appropriate.

New text added referencing design and specification standards for heat networks to ensure efficient and cost-effective operation. Text added to reference how heat networks should establish plans to decarbonise.

Small changes to supporting text to provide additional clarity on London's wider gas and electricity infrastructure in particular reference to renewable energy and the smart energy grid.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• Changes to strengthen design and specification standards for heat networks should further promote high quality design and sustainable design and construction methods. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

Objective 10 Economic competitiveness and employment

 Clarification around energy masterplanning and London's wider gas and electricity infrastructure should improve the design and implementation of London's energy networks. This should help to further secure the efficient operation of London's heat and power systems and contribute to improving the resilience of businesses and the economy. This is likely to have positive impacts in the medium and longer term

No changes to the matrix.

# Objective 11 Infrastructure

• By improving London's energy systems and ensuring high quality heat networks, helps to ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery. This is likely to have positive impacts in the medium and longer term

No changes to the matrix.

Objective 16 Climate change adaptation and mitigation

 Clarification of the policy and strengthening of design and specification standards for heat networks should help to reduce the built environment's contributions to CO2 emissions and promote a transition to a low carbon economy, as well as helping to facilitate investment in green heating technologies and promoting sustainable utilities infrastructure. This is likely to have positive impacts in the short, medium and longer term. No changes to the matrix.

Objective 17 Energy use and supply

• The changes would further promote the generation of energy locally, particularly through the utilisation of low-carbon heat which would help promote the transition to a low carbon economy. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 5 Housing Supply, Quality, Choice and Affordability

• Changes to ensure the efficient operation of heat networks should help to improve energy efficiency and reduce the negative health impacts of poor energy efficiency and fuel poverty. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

Objective 17 Energy use and supply

• Changes to ensure the efficient and cost-effective operation of heat networks should help to reduce impacts of fuel poverty on vulnerable groups. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

No impacts identified.

No changes to the matrix.

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 17 Energy use and supply

Changes to ensure the efficient and cost-effective operation of heat networks should help to
improve energy efficiency and reduce impacts of fuel poverty – this could have a positive impact in
particular for children, older people and disabled people who often have greater energy need and are
more likely to experience fuel poverty (evidence from <a href="The Mayor's equality">The Mayor's equality</a>, diversity and inclusion
strategy). This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

### SI3 Energy Infrastructure

IIA Element											-	IA Obje	ectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	1	1						1	1											Г				
Short Term						n/a	?/+		n/a	+	+	n/a	n/a	0	?	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						n/a	?/+		n/a	+	+	n/a	n/a	0	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						n/a	?/+		n/a	+	+	n/a	n/a	+	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						n/a	D		n/a	D	ı	n/a	n/a	Į.	D	ı	D	n/a	n/a	n/a	n/a	ı	n/a	n/a
Temporary / Permanent						n/a	Р		n/a	Р	T/P	n/a	n/a	T/P	Р	T/P	Р	n/a	n/a	n/a	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		n/a	L	L	n/a	n/a	L	L/G L	L	L/G L	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA	_																							
Short Term	n/a	n/a	?	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	0	?		+	n/a						
Medium Term	n/a	n/a	+/?	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+/?	?		++	n/a						
Long Term	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a						
Direct / Indirect	n/a	n/a	ı	n/a	I/D	n/a	n/a	n/a	n/a	n/a	ı	n/a	n/a	ı	D		D	n/a						
Temporary / Permanent	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P	Р		Р	n/a						
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L	L/G L		L/G L/ W	n/a						
HIA																								
Short Term	n/a	n/a	?		+				n/a	n/a				0	?		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+/?		+				n/a	n/a				0	?		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				+	?		+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	ı		D				n/a	n/a				ı	D		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		T/P				n/a	n/a				T/P	Р		T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L	L/G L		L	n/a		n/a	n/a	n/a		n/a
CSIA		1					1	1											I		I			
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 9 Sustainable Infrastructure	<b>Policy:</b> SI4 Managing Heat Risk

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Supporting text added to note that although the cooling hierarchy in the policy applies to major developments, the principles can also be applied to minor development.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 17 Energy use and supply

• wider adoption of passive design measures may reduce the need for active cooling so may have a minor impact in reducing the demand and need for energy. This is likely to have positive impacts in the short, medium and longer term.

No changes to the matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 15 Climate change adaptation and mitigation

wider adoption of measures to reduce overheating across smaller scale developments may slightly
help to reduce the impacts of the heat island effect. This is likely to have positive impacts in the
short, medium and longer term.

No changes to the matrix.

### 4. CSIA (Community Safety Impact Assessment)

### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

# 5. EqIA - Equality Impact Assessment

### a. are the changes likely to have an impact on one or more protected characteristics?

# b. If yes, summarise the impact on the protected characteristic(s).

Objective 15 Climate change adaptation and mitigation

wider adoption of measures to reduce overheating across smaller scale developments may help to
reduce the impacts of the heat island effect and health risk associated with overheating. This could
have a positive impact in particular for children and older people who can be more at risk from the
effects of severe weather associated with climate change, such as heat-waves (see para 2.8.3
<a href="https://www.london.gov.uk/sites/default/files/nlp\_ex\_33c\_appendix\_3\_summary\_.pdf">https://www.london.gov.uk/sites/default/files/nlp\_ex\_33c\_appendix\_3\_summary\_.pdf</a>) This is
likely to have positive impacts in the short, medium and longer term.

### No changes to the matrix

Chapter: 9 Sustainable Infrastructure	Policy: SI5 – Water Infrastructure

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part B: Clarification that Development Plans can only 'contribute' to security of supply, as Plans can realistically not 'ensure' it. This represents no material change.

Part C: Clarification that Development Plans should minimise the use of mains water in line with the Optional Requirement of Building Regulations specifically 'through the use of Planning Conditions'.

Part E (and corresponding paragraph 9.5.11): Clarification that Development Proposals can only 'take action' to minimise the potential for misconnections, as it can realistically not be 'ensured' that such misconnections 'are eliminated'. This represents no material change.

Paragraphs 9.5.4 and 9.5.5: As the water resource management planning process is not complete, it has been too early to be explicit about specific supply options and their review. The level of detail has therefore been reduced to avoid that the Plan quickly becomes inaccurate compared to Thames Water's final Water Resource Management Plan. This represents no material change.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 15: Climate change adaptation and mitigation

The addition to Part C helps to clarify how the policy, including the use of water to address the risk of drought, should be implemented. This is likely to have positive impacts in the short, medium and longer term. These impacts are already accurately reflected in the matrix.

Objective 18: Water resources and quality

The addition to Part C helps to clarify how the policy including the approach to support (demand management and reduce discharge should be implemented. This is likely to have positive impacts in the short and medium term and significant positive impacts in the longer term. These impacts are already accurately reflected in the matrix.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

N/a

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

N/a

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

N/a

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI6 Digital connectivity infrastructure

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Policy SI6 now requires Development Plans to support the delivery of digital infrastructure, with a particular focus on gaps in connectivity and barriers to access. This is now further emphasised in the supporting text which now specifies that boroughs should encourage the delivery of high-quality digital infrastructure as part of their Development Plans.

The supporting text has been edited to strengthen the requirements for developments to provide a minimum level of digital connectivity.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10 Economic competitiveness and employment

• Requiring Development Plans to support the delivery of digital infrastructure, particularly gaps and barriers to digital access issues, may help to maintain London's position as a global competitive city, increase productivity, and support businesses through the identification of digital connectivity gaps and supporting the provision of digital infrastructure. This is likely to result in positive impacts in the short (+), medium (+) and long (+) term which are already reflected in the matrix.

# Objective 11 Infrastructure

• Requiring Development Plans to support the delivery of digital infrastructure, particularly gaps and barriers to digital access issues may help to ensure the provision of the physical digital infrastructure that is required to support economic competitiveness throughout London. Positive impacts in the short (+), medium (+) and long (++) term are already reflected in the matrix.

### 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

Objective 3 Health and health inequalities

• Requiring Development Plans to support the delivery of digital infrastructure and consider connectivity gaps and barriers and facilitating better digital information will have positive impacts because in an increasingly digital world, people who are digitally excluded can be at risk of worse access to services and worse health outcomes<sup>1</sup>. Positive impacts in the short (+), medium (+) and long (+) term are already reflected in the matrix.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

¹ https://digital.nhs.uk/about-nhs-digital/our-work/digital-inclusion/digital-inclusion-in-health-and-social-care

# b. If yes, summarise the impact on the protected characteristic(s).

Older people and disabled people, are among the groups who more likely to be digitally excluded than others. Requiring Development Plans to support the delivery of digital infrastructure, and a focus on areas with gaps in connectivity and gaps to digital access may help to address some of the issues around digital exclusion in these particular groups in London, representing a positive impact. This is expanded below.

# Objective 1 Equality and inclusion

• Requiring Development Plans to consider digital connectivity gaps and barriers may contribute towards making London a fairer and more inclusive city by addressing areas with connectivity gaps and providing opportunities for older Londoners, disabled Londoners and those lower income groups to connect digitally. Positive impacts in the short (+), medium (+) and long term (++) are already identified – no change to matrix.

# Objective 2 Social Integration

Requiring Development Plans to consider digital connectivity gaps and barriers may contribute
towards making London a fairer and more inclusive city by addressing areas with connectivity gaps
working to support strong and socially integrated communities, positively affecting older Londoners,
disabled Londoners and in lower income groups. Positive impacts in the short (+), medium (+) and
long (+) term are already identified. No change to matrix.

# Objective 10 Economic competitiveness and employment

• Requiring Development Plans to consider digital connectivity gaps and barriers may help to support employment opportunities in the most deprived areas through the provision of adequate digital infrastructure to support businesses. Positive impacts in the short (+), medium (+) and long term (++) are already identified – no change to matrix.

# Objective 11 Infrastructure

• Requiring Development Plans to consider digital connectivity gaps and barriers may help to ensure equity of access to physical infrastructure for lower income and deprived areas. Positive impacts in the short (+), medium (+) and long term (++) are already identified – no change to matrix.

<b>Chapter:</b> 9 Sustainable Infrastructure	<b>Policy:</b> SI7 Reducing waste and supporting the circular
	economy

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The policy has been amended to remove the target year for the reuse/recycling/recovery of construction and demolition (CD) waste as it is expected that all projects should be currently meeting the 95% target.

A target for the beneficial use for excavation waste has been introduced into the policy to promote the diversion of this waste stream away from landfill, it is expected that 95% of waste stream will be diverted from landfill.

A new policy clause, Part C,has been included to support Development Plans that include circular economy principles and those that set local thresholds for Circular Economy Statements.

Several points of clarification have been made to the policy text to strengthen the requirements for referable applications to demonstrate a reduction in material demands, to enable the collection of separate waste streams and to manage waste in accordance with the waste hierarchy through Circular Economy Statements.

The principles of a circular economy and how it is being introduced in London has been clarified and expanded upon in the supporting text. Further information on recycling rates and a description of the beneficial use of excavation waste have also been included in the supporting text.

The requirements on information sharing by waste producers when sending waste to landfill have also been clarified in the supporting text.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

### Objective 7 Design

Clarifying the requirements for Circular Economy Statements, particularly around the separation of
waste, and encouraging local authorities to include circular economy principles in Development Plans
may promote high quality design and sustainable design and construction methods in London
through the wider adoption of and better inclusion of circular economy principles. This is likely to be
unknown in the short term and positive in the medium and longer term. Matrix to be updated.

# Objective 10 Economic competitiveness and employment

• Encouraging local authorities to include circular economy principles in Development Plans may support a strong and resilient economic structure through the wider adoption of circular economy principles in developments in London. This is likely to be positive in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 14 Air Quality

Expanding upon the role of circular economy principles in London's waste management and building
design and the sustainable use of materials and waste may reduce emissions from the movement of
materials and the extraction and production of virgin materials which may improve London's air
quality. This is likely to be positive in the short, medium and longer term. Matrix to be updated.

### Objective 16 Climate change adaptation and mitigation

• Introducing a new target for the beneficial use of excavation waste, supporting circular economy principles in Development Plans and providing further guidance on circular economy principles and recycling may help to reduce the built environments contribution to carbon emissions, and promote the transition to a low carbon economy through the adoption of circular economy principles in London and the more efficient use of resources. This is likely to be positive in the short, medium and longer term. Matrix to be updated.

# Objective 17 Energy use and supply

• Introducing a new target for the beneficial use of excavation waste, supporting circular economy principles in Development Plans and providing further guidance on circular economy principles and recycling may help to ensure resources are used efficiently through the adoption of circular economy principles in London and the more efficient use of resources. This is likely to be positive in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 23 Materials and waste

• Introducing a new target for the beneficial use of excavation waste, strengthening the policies around waste reuse and recovery, and encouraging Development Plans to include circular economy principles will help to encourage the adoption of circular economy principles in London and encourage better use of materials. This is likely to be positive in the short term, with significant positive benefits in the medium and longer term. Matrix to be updated.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

### Objective 14 Air Quality

Promoting the adoption of circular economy principles and the sustainable use of materials and
waste may reduce emissions from the movement of materials and the extraction and production of
virgin materials which may improve London's air quality and associated health impacts. This is likely
to be positive in the short, medium and longer term. Matrix to be updated.

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No change

### SI7 Reducing waste and supporting the circular economy

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA				1				I											ı			1		
Short Term						n/a	?		0	+	n/a	n/a	n/a	?/+	+	+/?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	+ /?		0	+	n/a	n/a	n/a	?/+	+	+/?	+	n/a	n/a	n/a	n/a	?	++	?/+
Long Term						n/a	+		0	+	n/a	n/a	n/a	?/+	+	+/?	+	n/a	n/a	n/a	n/a	?	+	?/+
Temporary / Permanent						n/a	ı		I/D	I/D	n/a	n/a	n/a	D	ı	ı	D	n/a	n/a	n/a	n/a	ı	D	D
Direct / Indirect						n/a	Р		Т	Р	n/a	n/a	n/a	Р	Р	Р	Р	n/a	n/a	n/a	n/a	Р	Р	Р
Local / Greater London / Wider Region / Global EQIA						n/a	L		L	L/G L	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
Short Term	,	Ι,	,	,	,	,		,	,			,	,					,	,	,	Ι,	Ι,		
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	n/a	n/a	n/a	n/a		n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	++
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	Р	n/a	n/a	Р	n/a	Р	n/a	Р	Р		Р	n/a	n/a	n/a	n/a	n/a	Р	Р
Local / Greater London / Wider Region / Global HIA	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L/G L	n/a	L/G L	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				?/+	0		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				?/+	0		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				?/+	0		?/+	n/a		n/a	n/a	n/a		?/+
Temporary / Permanent	n/a	n/a	ı		n/a				n/a	n/a				ı	ı		ı	n/a		n/a	n/a	n/a		D
Direct / Indirect	n/a	n/a	Р		n/a				n/a	n/a				Р	Р		T/P	n/a		n/a	n/a	n/a		Р
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
CSIA				ı		1	1					1	1	1	1									
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI8 Waste capacity and net waste self-
	sufficiency

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The policy now requires Development Plans to plan for identified waste needs, which may include waste streams beyond those discussed and/or apportioned in the London Plan. Further information has been provided in the supporting text, including the need to identify additional waste management capacity beyond that required by the London Plan apportionment requirements.

The requirement for Mayoral Development Corporations (MDCs) to cooperate with host boroughs to meet identified waste needs has been moved from the supporting text into policy. The requirements of MDCs to meet identified waste needs has also been clarified in the supporting text.

The requirements for new for materials and waste management development proposals have been clarified, including the criteria that proposals should be assessed against. This includes further explanation in the requirements for combined heat and power facilities, with the importance of low emission facilities emphasised and the requirements for the delivery of heat networks emphasised.

Reference to the value that new or enhanced waste sites can bring in terms of job creation, addressing local need and providing an accessible service has been included in the policy.

Several errors due to incorrect rounding have been corrected in Table 9.1 and 9.2.

Commitments to joint working in monitoring waste streams and sharing data have been included in the supporting text, as well as further information on how compensatory capacity may be provided beyond the borough where the waste site is proposed to be lost.

The role of hazardous waste in all waste streams and apportionment requirements has been clarified in the supporting text.

### 1.b Panel Recommendations

The Panel recommended the addition of wording that full consideration should be given to MDC apportionment in future plans. This has been added to the supporting text of SI8. This does not result in any changes in relation to the impacts on the objectives already identified.

### 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 11 Infrastructure

Requiring Development Plans to plan for all waste streams, for waste sites to consider the waste
hierarchy, and strengthening the requirement for MDCs to joint working may help to ensure physical
waste infrastructure is managed and delivered to meet demand in line with sustainability principles.
This is likely to have positive impacts in the short, medium and longer term.

Matrix to be updated.

Objective 14 Air Quality

• Changes to the part C of the policy clarify that CHP should be only emission and only acceptable where it is part of area wide heat networks, consistent with SI3 could help to have positive impacts for local air quality. Whilst promoting waste sites that are accessible for local communities and that implement the waste hierarchy and circular economy principles may also help to reduce emissions which could also be beneficial for air quality depending on local implementation. This is likely to have a positive impact in the short (+), medium (+) and long-term (+).

Matrix to be updated.

Objective 16 Climate change adaptation and mitigation

 Requiring waste sites to consider the waste hierarchy, clarifying the assessment criteria for new waste management development proposals may promote better material and waste management and help move London towards a zero-carbon city. This is likely to be positive in the short, medium and longer term.

Matrix to be updated.

Objective 17: Energy

• Through requiring waste sites to consider implementing the waste hierarchy and circular economy principles, this can help to promote better waste management and use of resources helping to support a transition to a lower carbon economy. Positive impacts are already identified in the short (+), medium (+) and long (+) term.

No change to matrix.

Objective 23 Materials and waste

• Requiring Development Plans to plan for all waste streams, for waste sites to consider the waste hierarchy, and strengthening the requirement for MDCs to joint working may help to promote the adoption of circular economy principles in London and better waste and materials management. This is likely to be positive in the short, medium and longer term.

No change to matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 14 Air Quality

Requiring waste sites to consider the waste hierarchy, clarifying the assessment criteria for new waste
management development proposals may promote better material and waste management, reduce
emissions associated with the transportation and extraction or production of virgin, and promote
better practices at waste management sites which may lead to improvements in London's air quality.
This is likely to be positive in the short, medium and longer term.

Matrix to be updated.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

No change

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

None.

b. If yes, summarise the impact on the protected characteristic(s).

### SI8 Waste Capacity and Net Self -Sufficiency

IIA Element	nt IIA Objec										IIA Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA						1																		
Short Term						n/a	?		+	+	+	n/a	n/a	+/?	+	+	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		+	+	+	n/a	n/a	+/?	+	+	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		+	+	+	n/a	n/a	+/?	+	+	+	n/a	n/a	n/a	n/a	?	++	?/+
Direct / Indirect						n/a	ı		I/D	I/D	I/D	n/a	n/a	D	ı	I	D	n/a	n/a	n/a	n/a	ı	D	D
Temporary / Permanent						n/a	Р		Т	Р	Р	n/a	n/a	Р	Р	Р	Р	n/a	n/a	n/a	n/a	Р	Р	Р
Local / Greater London / Wider Region / Global						n/a	L		L	L/G L	L/G L	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
EQIA				,	,	,																		
Short Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	++
Temporary / Permanent	n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	Р	n/a	n/a	n/a	Р	n/a	n/a	Р	n/a	Р	n/a	Р	Р		Р	n/a	n/a	n/a	n/a	n/a	Р	Р
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L	n/a	n/a	n/a	L	n/a	n/a	L/G L	n/a	L/G L	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
HIA	I	ı			1		l		l	l								ı		1		1		
Short Term	n/a	n/a	+		n/a				n/a	n/a				?/+	+		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				?/+	+		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	+		n/a				n/a	n/a				?/+	+		?/+	n/a		n/a	n/a	n/a		?/+
Direct / Indirect	n/a	n/a	ı		n/a				n/a	n/a				D	I		I	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	Р		n/a				n/a	n/a				Р	Р		T/P	n/a		n/a	n/a	n/a		Р
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
CSIA						1			ı	l	1													
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

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Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI9 safeguarded waste sites

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clause C has been strengthened to require any replacement waste sites to be at or above the same level in the waste hierarchy as the proposed lost site.

The policy has been strengthened through requiring the proposed loss of any hazardous waste site to be replaced with a hazardous waste management facility.

An additional clause has been included to clarify that the relocation of waste sites within London are supported where strategic outcomes are achieved.

There are several wording clarifications and strengthening in the supporting text.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 11 Infrastructure

• Requiring replaced waste sites to consider the waste hierarchy will help to ensure waste is reduced and managed more sustainability and physical waste infrastructure is delivered to meet demand in line with sustainability principles. This is likely to have positive impacts in the short, medium and longer term. Update Matrix.

Objective 23 Materials and Waste

• Requiring replaced waste sites to consider the waste hierarchy will help to ensure waste is reduced and managed more sustainability, this is likely to have positive impacts in the short, medium and long term. No update to matrix.

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No change.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change.

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No change

### SI9 Safeguarded waste sites

IIA Element												IIA Obi	ectives	<b>S</b>										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			ı					1												•				
Short Term						n/a	?		+	+	+	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		+	+	+	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		+	+	+	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	++	?/+
Direct / Indirect						n/a	ı		I/D	I/D	D	n/a	n/a	D	ı	ı	D	n/a	n/a	n/a	n/a	ı	D	D
Temporary / Permanent						n/a	Р		Т	Р	T/P	n/a	n/a	Р	Р	Р	Р	n/a	n/a	n/a	n/a	Р	Р	Р
Local / Greater London / Wider Region / Global						n/a	L		L	L/G L	L/G L	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
EQIA																								
Short Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+/?
Long Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	+/?
Temporary / Permanent	n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	Р	n/a	n/a	n/a	Р	n/a	n/a	Р	n/a	Р	n/a	Р	Р		Р	n/a	n/a	n/a	n/a	n/a	Р	Р
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L	n/a	n/a	n/a	L	n/a	n/a	L/G L	n/a	L/G L	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
HIA																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				D	ı		ı	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	Р		n/a				n/a	n/a				Р	Р		T/P	n/a		n/a	n/a	n/a		Р
Local / Greater London / Wider Region / Global	n/a	n/a	L/G L		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
CSIA							1		_	1														
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

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<b>Chapter:</b> 9 Sustainable Infrastructure	Policy: SI10 Aggregates

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The policy text has been changed to encourage the reuse and recycling of construction, demolition and excavation (CDE) waste into aggregate material; to further support and encourage the movement of aggregates by sustainable transport modes (rail and water); and to encourage the use of secondary and recycled aggregate over primary aggregate.

Additional categories of aggregates sites to be identified and safeguarded have been included in the policy (transportation, distribution, processing and production sites) to ensure that London has the facilities required to extract, import, move and process aggregate materials to support development and growth.

The requirements and process for development proposals to demonstrate mitigation of environmental impacts have been clarified within the policy, and are later expanded upon in the supporting text.

Changes have been made to the policy to ensure that development adjacent to safeguarded aggregates sites are designed to avoid and mitigate potential conflicts.

The supporting text has been edited to:

- encourage the use of recycled and secondary aggregate created from CDE waste
- clarify how boroughs should demonstrate that they meet apportionment requirements and plan for the provision of aggregate landbanks as required under the policy
- clarify that all facilities involved in the extraction, processing, manufacture and transportation of aggregates require safeguarding, with further emphasis on the importance of railheads
- expand on and specify the environmental, heritage and amenity values that must be considered when assessing development proposals for aggregate sites.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 10 Economic competitiveness and employment

The identification and safeguarding of all sites required to ensure the adequate supply and delivery
of aggregate to London is important in the provision of physical infrastructure and economic growth
in London, expanding those areas that require safeguarding may support a strong, diverse and
resilient economic structure and encourage economic growth in the capital. This is likely to have
positive impacts in the short, medium and longer term. These impacts are already reflected in the
matrix.

### Objective 11 Infrastructure

• The identification and safeguarding of all facilities required to ensure the supply and delivery of aggregate to London may contribute towards ensuring the provision of the infrastructure required to support economic competitiveness and housing delivery in London. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

### Objective 14 Air quality

• Encouraging and promoting the use of sustainable transport modes may help to reduce emissions and contribute towards improvements in London's air quality. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 16 Climate change and mitigation

• Encouraging and promoting the use of recycled and secondary aggregate and the use of sustainable transport modes may contribute towards reducing greenhouse gas emissions from both transport movement and primary aggregate extraction and support the move towards a zero-carbon city. This is likely to have positive impacts in the short, medium and longer term.

# Objective 20 Natural capital and natural environment

• More explicitly setting out the environmental, heritage and amenity considerations that proposals for aggregate facilities must consider and mitigate impacts to, may contribute towards the protection of London's natural capital and the eco-system services it provides. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

### Objective 21 Historic Environment

 More explicitly setting out the environmental, heritage and amenity considerations that proposals for aggregate facilities must consider and mitigate impacts to, may contribute towards the protection of London's historic environment and archaeological and cultural values. This is likely to have an unknown or positive impact in the short, medium and longer term.

### Objective 23 Materials and waste

Encouraging and promoting the use of recycled and secondary aggregate may contribute towards
London's aim of a circular economy by keeping materials at their highest value and in use for as long
as possible, and may support waste reduction in the construction and development sector, and
encourage higher reuse and recycling rates. This is likely to have positive impacts in the short,
medium and longer term. These impacts are already reflected in the matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

### Objective 3 Health and Health Inequalities

• Clarifying the requirements and process for aggregate development proposals to effectively control potential impacts on human health and the environment may help to reduce the health impacts of aggregate developments through promoting consideration and mitigation of potential health impacts early in the development process. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 14 Air quality

• Encouraging and promoting the use of sustainable transport modes may help to reduce emissions and concentrations of harmful atmospheric pollutants through reduced transportation emissions. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 20 Natural Capital and Natural Environment

Clarifying the requirements and process for aggregate development proposals to demonstrate
mitigation of environmental impacts may protect and improve access to London's natural through
promoting early consideration and mitigation of possible biodiversity impacts early in the
development process. This is likely to have positive impacts in the short, medium and longer term
These impacts are already reflected in the matrix.

### Objective 21 Historic Environment

• Clarifying the requirements and process for aggregate development proposals to ensure potential impacts to the historic environment are assessed and effectively controlled may increase the social benefit derived from the historic environment through promoting early consideration and mitigation of possible heritage impacts early in the development process. This is likely to have a ?/+ in the short, medium and longer term.

# Objective 24 Noise and Vibration

- Clarifying the requirements and process for aggregate development proposals to demonstrate mitigation of environmental impacts may reduce the number of people exposed to high levels of noise through promoting the early consideration and mitigation of noise impacts in the development process. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.
- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No change

### SI10 Aggregates

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA			1		<b>.</b>	Г			1									1				_		
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	+	n/a	n/a	n/a	+	?/+	n/a	+	+/?
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	+	n/a	n/a	n/a	+	?/+	n/a	+	+/?
Long Term						n/a	n/a		n/a	+	++	n/a	n/a	+	+	+	n/a	n/a	n/a	+	?/+	n/a	+	+/?
Direct / Indirect						n/a	n/a		n/a	D	D	n/a	n/a	I	ı	n/a	n/a	n/a	n/a	D	I	n/a	ı	I
Temporary / Permanent						n/a	n/a		n/a	Р	Р	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	Р	T/P	n/a	Р	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L	L	n/a	n/a	L/G L	L/G L	n/a	n/a	n/a	n/a	L/G L	L/G L	n/a	L/G L	L
EQIA				,																				
Short Term	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Medium Term	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Long Term	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Direct / Indirect	ı	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	ı		n/a	n/a	n/a	D	n/a	n/a	D	I
Temporary / Permanent	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	Р	n/a	n/a	Р	Р
Local / Greater London / Wider Region / Global	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	L/G L		n/a	n/a	n/a	L/G L	n/a	n/a	L/G L	L
HIA																								
Short Term	+/?	n/a	+/?		n/a				n/a	n/a				+	0		n/a	n/a		+	?/+	n/a		+/?
Medium Term	+	n/a	+		n/a				n/a	n/a				+	0		n/a	n/a		+	?/+	n/a		+/?
Long Term	+	n/a	+		n/a				n/a	n/a				+	0		n/a	n/a		+	?/+	n/a		+/?
Direct / Indirect	I	n/a	I		n/a				n/a	n/a				I	I		n/a	n/a		D	n/a	n/a		ı
Temporary / Permanent		n/a			n/a				n/a	n/a					T/P		n/a	n/a			n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/G L	n/a	L/G L		n/a				n/a	n/a				L/G L	L/G L		n/a	n/a		L/G L	n/a	n/a		L
CSIA				1		ı		ı			1			1	1						1			
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

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- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> SI12 – Flood risk management
1. Initial assessment:	
a. brief summary of extent of changes and whe the policy	ether the change is already reflected somewhere in
Part A: Clarification that 'flood risk from all sources' The inclusion of this reference does not represent a	is defined in the supporting text (paragraph 9.12.2). material change.
2. SEA (Strategic Environmental Assessment)	
2a. are the changes likely to have an impact on	any of the objectives with SEA guide questions?
N/a	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact on	any of the objectives with HIA guide questions?
N/a	
4. CSIA (Community Safety Impact Assessmen	t)
4a. are the changes likely to have an impact on	any of the objectives with CSIA guide questions?
N/a	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on	one or more protected characteristics?
b. If yes, summarise the impact on the protect	ed characteristic(s).
N/a	

<b>Chapter:</b> 9 Sustainable Infrastructure	<b>Policy:</b> SI13 – Sustainable Drainage

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part B: Clarification linking the drainage hierarchy directly to the preference for green over grey features. As the wording itself has not been changed but only re-positioned, there is no material change.

Part C: Clarification widening the refusal of development proposals from impermeable 'paving' to impermeable 'surfacing'.

#### **Panel Recommendations:**

The Panel recommended a minor change to Part C of the policy so that an appropriate planning balance can be take into account – emphasing that proposals for impermeable surfacing should normally be resisted than refused. This is not considered to be a material change or change the impacts on the objectives already identified.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 15 – Climate change adaption and mitigation

 Part C: Widening the application of this policy clause to other types of surfacing beyond paving, further helps to address surface water flood risk, e.g. from heavy rainfall. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

Objective 19 – Flood risk

 Part C: Widening the application of this policy clause to other types of surfacing beyond paving, further helps to promote sustainable urban drainage. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix

# 3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No Impact

### 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

# 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

b. If yes, summarise the impact on the protected characteristic(s).

N/a

Chapter: 9 Sustainable Infrastructure	<b>Policy:</b> Sl14 Waterways – strategic role

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

An additional policy clause has been included that requires Development Plans and development proposals to address the strategic importance of London's network of waterways and to seek to maximise their benefit. The policy now also explicitly encourages boroughs to work together to address the waterway and develop area based strategies that address waterway issues.

Guidance on the information that Joint Thames Strategies and other area based joint waterways strategies should include has been moved from supporting text into policy, emphasising the importance of developing such joint strategies.

Supporting text has been added to address to further emphasise importance of cross-borough policy coordination along the waterways through planning. A more joined up and cohesive approach will deliver better outcomes for London's waterways.

Specific reference to World Heritage Sites has been included into the supporting text, highlighting the importance the Thames plays as the backdrop to a number of London's World Heritage Sites.

### 1.b Panel Recommendations

Following the Panel's recommendation it is proposed to add supporting text that deals with changes to MOL boundaries from the waterways policies to the supporting text to policy G3. No other existing text is proposed to be altered. The additional text helps to cross reference the waterways policies and multifunctional use of the Thames in considering changes to MOL boundaries along the waterways. This is not considered to change the impacts on the objectives already identified both in relation to SI4 and G3.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

Requiring both Development Plans and development proposals to consider the strategic importance
of the waterways and promoting cross-borough collaboration in waterways planning may help to
improve and create a cohesive built environment along London's waterfront, leading to better use of
land and to support sustainable patterns of development. This is likely to have positive impacts in
the short, medium and longer term.

No Change to the Matrix.

Objective 9 Connectivity

Requiring both Development Plans and development proposals to consider the strategic importance
of the waterways and promoting cross-borough collaboration can help to contribute towards
improvements in connectivity across the River Thames and along all of London' waterways through
better coordination across boroughs in waterways planning. This is likely to have positive impacts in
the short, medium and longer term.

No Change to the Matrix.

Objective 15 Climate change adaptation and mitigation

Requiring both Development Plans and development proposals to consider the strategic importance
of the waterways and promoting cross-borough collaboration may help to encourage joint working
on mitigating the impacts of climate change, particularly managing the risk of flooding, resulting in

more joined up and robust mitigation proposals. This is likely to result in neutral impacts in the short term, +/? Impacts in the medium term and + impacts in the longer term.

Matrix to be updated.

# Objective 19 Flood Risk

• Requiring both Development Plans and development proposals to consider the strategic importance of the waterways and promoting cross-borough collaboration may help to encourage joint working on mitigating the risk of flooding, resulting in more joined up and robust flood mitigation proposals. This is likely to result in positive impacts in the medium and longer term.

Matrix to be updated.

# Objective 20 Natural Capital and Natural Environment

Requiring both Development Plans and development proposals to consider the strategic importance
of the waterways and promoting cross-borough collaboration may help protect, connect and
enhance London's natural capital alongside and in its waterways, as well as conserving and
enhancing its historic environment. This is likely to have positive impacts in the short, medium and
longer term.

No Change to the Matrix.

# Objective 21 Historic Environment

• Specifically referencing the importance of World Heritage Sites along London's waterways may help to conserve and enhance these heritage assets along the waterways. This is likely to have positive impacts in the short, medium and longer term.

No Change to the Matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and Health Inequalities

• Requiring both Development Plans and development proposals to consider the strategic importance of the waterways and promoting cross-borough collaboration will help to support the coordinated planning and development of the Thames Path and recreational activities alongside and in the waterways, which in turn can help to support the physical and mental health and wellbeing of communities. This is likely to result in neutral impacts in the short term, +/? Impacts in the medium term and + impacts in the longer term.

Matrix to be updated.

# Objective 9 Connectivity

Requiring both Development Plans and development proposals to consider the strategic importance
of the waterways and promoting cross-borough collaboration will help to support the development
of the Thames Path and other waterside paths, improving pedestrian connectivity within London
through better coordinated planning. This is likely to have positive impacts in the short, medium and
longer term.

No Change to the Matrix.

### Objective 20 Natural Capital and Natural Environment

• Requiring both Development Plans and development proposals to consider the strategic importance of the waterways and promoting cross-borough collaboration will support the improvement of

London's waterways and bring nature closer to people through better planning of waterway spaces. This is likely to have positive impacts in the short, medium and longer term.

Matrix to be updated

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

No Impact

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 7 Design

 Guidance on Joint Thames Strategies and other area based joint waterways strategies in to policy is likely to result in better design outcomes by improving the legibility and ease of use of the built environment which is likely to positively benefit people with mobility issues such as older people, the very young, parents with pushchairs as well as disabled people, particularly those people with sensory or cognitive impairments. This is likely to have positive impacts in the short, medium and longer term.

No change to the matrix.

### SI14 Waterways – Strategic Role

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA		1	1	I	<b>i</b>	<u> </u>					Γ	ı				ı					ı			
Short Term						n/a	+		+	+	n/a	n/a	?	0	0	0	n/a	+/?	+/?	+	?/+	n/a	n/a	n/a
Medium Term						n/a	+		+	+	n/a	n/a	?	0	+/?	0	n/a	+/?	+	+	?/+	n/a	n/a	n/a
Long Term						n/a	+		+	+	n/a	n/a	?	0	+	0	n/a	+/?	+	+	?/+	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	D	n/a	n/a	D	D	D	D	n/a	D	D	ı	D	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		Р	Р	n/a	n/a	Р	Р	Р	Р	n/a	T/P	T/P	T/P	Р	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/G L		L/G L	L	n/a	n/a	L/G L	L/G L/ W	L/G L/ W	L/G L/ W	n/a	L/G L	L/G L	L/G L	L/G L	n/a	n/a	n/a
EQIA				ı		<u> </u>					ı	1												
Short Term	?	?	?	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	?	?		n/a	?	?	?	?	n/a	n/a	?
Medium Term	0	?	+	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	+	?		n/a	?	?	?	?	n/a	n/a	+
Long Term	+	?	+	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	+	+		n/a	?	?	?	?	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	n/a	I/D	I/D	D	D	n/a	n/a	D	D	I/D		n/a	I/D	I/D	I/D	I/D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	Р	Р	n/a	n/a	Р	Р	T/P		n/a	T/P	T/P	T/P	Р	n/a	n/a	Р
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L	L/G L	n/a	L/G L	n/a	L/G L	L/G L	L/G L	L/G L	n/a	n/a	L/G L	L/G L/ W	L/G L/ W		n/a	L/G L	L/G L	L/G L	L/G L	n/a	n/a	L/G L
HIA																								
Short Term	0	0	0		+/?				+	n/a				0	0		n/a	?		+	n/a	?		n/a
Medium Term	0	0	+/?		+/?				+	n/a				0	0		n/a	?		+	n/a	?		n/a
Long Term	+/?	+/?	+		+/?				+	n/a				0	0		n/a	?		+	n/a	?		n/a
Direct / Indirect	ı	-	ı		I/D				D	n/a				D	D		n/a	D		D	n/a	D		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				Р	n/a				Р	Р		n/a	T/P		Р	n/a	Р		n/a
Local / Greater London / Wider Region / Global	L	L	L		L/G L				L/G L	n/a				L/G L/ W	L/G L/ W		n/a	L/G L		L/G L	n/a	L/G L		n/a
CSIA																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L															

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- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 7. 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 motorised transport.
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 9 Sustainable Infrastructure	Policy: SI15 Water Transport

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The requirements for development proposals on a safeguarded wharf have been clarified and strengthened, emphasising that a wharf is safeguarded even if it is currently vacant and that any proposed development must ensure the long-term water freight use of the site is secured, changes have been made to both the policy and supporting text. The changes strengthen the protection of safeguarded wharves and their ongoing use for waterborne transport under the London Plan.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

### Objective 6 Sustainable Land Use

• Strengthening the protection and use of London's network of safeguarded wharves for waterborne freight transport will support sustainable forms of freight movement and ensure that best use is made of these sites for transport purposes. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

### Objective 9 Connectivity

• Strengthening the protection of London's network of safeguarded wharves for the movement of waterborne freight may support an increase in sustainable modes of freight transportation and reduce traffic volumes and congestion on London's roads through the promotion and protection of waterborne freight in London. This is likely to have positive impacts in the short term, with more significant impacts in the medium and longer term. This is already reflected in the matrix.

### Objective 10 Economic Connectiveness and Employment

• Strengthening the protection of London's network of safeguarded wharves for the movement of waterborne freight may support an increase in London's productivity through supporting more sustainable forms of freight transport through the promotion and protection of waterborne freight in London. This is likely to have positive impacts in the short, medium and longer term. This is already reflected in the matrix

### Objective 11 Infrastructure

Strengthening the protection of London's network of safeguarded wharves for the movement of
waterborne freight may support the delivery of physical infrastructure, economic competitiveness
and housing delivery through the protection of sites for the handling and movement of large and
construction materials. This is likely to have positive impacts in the short, medium and longer term.
Matrix to be updated.

# Objective 14 Air Quality

Strengthening the protection of London's network of safeguarded wharves for the movement of
waterborne freight may support improvements in London's air quality through supporting more
sustainable forms of freight transport and get freight off the road through the promotion and
protection of waterborne freight in London. This is likely to have positive impacts in the short,
medium and longer term This is already reflected in the matrix.

### Objective 16 Climate change adaptation and mitigation

• Strengthening the protection of London's network of safeguarded wharves supports London's transition to a low carbon economy by ensuring sites that support more sustainable modes of freight transport are protected and utilised. This is likely to have positive impacts in the short, medium and longer term This is already reflected in the matrix.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 9 Connectivity

Strengthening the protection of London's network of safeguarded wharves for the movement of
waterborne freight may support an increase in sustainable modes of freight transportation and
reduce traffic volumes and congestion on London's roads and reduce road congestion in London.
This is likely to have positive impacts in the short, medium and longer term This is already reflected
in the matrix.

# Objective 14 Air Quality

• Strengthening the protection of London's network of safeguarded wharves for the movement of waterborne freight may support improvements in London's air quality through supporting more sustainable forms of freight transport and get freight off the road which may reduce the number of Londoners exposed to harmful atmospheric pollutants. This is likely to have positive impacts in the short, medium and longer term. This is already reflected in the matrix.

# 4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No change

#### **SI15 Water Transport**

IIA Element												IIA Ob	ectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA							1										<u> </u>		<u> </u>					
Short Term						+	n/a		+	+	+	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Medium Term						+	n/a		++	+	+	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Long Term						+	n/a		++	+	+	n/a	+	+	+	+	n/a	-	n/a	-	+	-	n/a	+
Direct / Indirect						D	n/a		D	D	D	n/a	D	ı	ı	ı	n/a	I/D	n/a	D	D	D	n/a	ı
Temporary / Permanent						Р	n/a		Р	T/P	Р	n/a	Р	Р	Р	Р	n/a	T/P	n/a	T/P	Р	T/P	n/a	Р
Local / Greater London / Wider Region / Global						L/G L	n/a		L/G L	L	L/G L	n/a	L/G L	L/G L/W	L/G L/W	L/G L/W	n/a	L/G L	n/a	L/G L	L/G L	L/G L	n/a	L/G L/W
EQIA														<u> </u>										
Short Term	?	?	+	0	n/a	n/a	n/a	0	+	+	+/?	n/a	+/?	+	0		n/a	-	n/a	-	+	n/a	n/a	+/?
Medium Term	+	+	+	0	n/a	n/a	n/a	0	+	+	+/?	n/a	+/?	+	0		n/a	-	n/a	-	+	n/a	n/a	+/?
Long Term	+	+	+	0	n/a	n/a	n/a	0	+	+	+/?	n/a	+/?	+	0		n/a	-	n/a	-	+	n/a	n/a	+/?
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	n/a	n/a	I/D	D	D	D	n/a	D	I	I		n/a	I/D	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	Р	T/P	T/P	n/a	T/P	Р	Р		n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	n/a	n/a	n/a	L	L/G L	L/G L	L/G L	n/a	L/G L	L/G L/W	L/G L/W		n/a	L/G L	n/a	L/G L	L/G L	n/a	n/a	L
HIA	-1	1														•			•		_			
Short Term	n/a	n/a	+		n/a				+	n/a				+	0		n/a	-		-	n/a	-		+
Medium Term	n/a	n/a	+		n/a				+	n/a				+	0		n/a	-		-	n/a	-		+
Long Term	n/a	n/a	+		n/a				+	n/a				+	0		n/a	-		-	n/a	-		+
Direct / Indirect	n/a	n/a	ı		n/a				D	n/a				1	D		n/a	D		I/D	n/a	D		1
Temporary / Permanent	n/a	n/a	T/P		n/a				Р	n/a				Р	T/P		n/a	T/P		T/P	n/a	T/P		P
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				L/G L	n/a				L/G L/W	L/G L/W		n/a	L/G L		L/G L	n/a	L/G L		L/G L/W
CSIA		ı																						1
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					ı															
Temporary / Permanent				n/a					Р															
Local / Greater London / Wider Region / Global				n/a					L															

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 9 Sustainable Infrastructure	<b>Policy:</b> SI16 Waterways - use and enjoyment

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

The policy now specifies that development proposals should also protect and enhance waterway infrastructure, as well as Development Plans.

The policy and supporting text have been changed to expand upon the types of moorings and facilities that are required on the waterways, more clearly setting out the categories of moorings and associated infrastructure that is supported. The supporting text has been changed to include reference to the contribution that continuous cruiser boats and live-aboard boat dwellers make to the character of the waterways.

# 2. SEA (Strategic Environmental Assessment)

# 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 11 Infrastructure

• Requiring development proposals to also consider the enhancement and protection of waterway infrastructure and the clarifications around mooring facilities that should be provided may help protect and enhance London's physical infrastructure along and into the waterway. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

# 3. HIA (Health Impact Assessment)

# 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3: Health and Health Inequalities

 Including reference to the contribution of live aboard boat dwellers and continuous cruiser boats to London's waterways, and highlighting the moorings and facilities required along London's waterways alongside other elements of the policy can help to support the provision of suitable mooring infrastructure. Being explicit about the need for proposals to provide facilities such as power, water and waste disposal can have positive impacts on health in the short, medium and long term, contributing to better quality living on the waterways. These impacts are already reflected in the matrix.

### Objective 2 Social Integration

• Including reference to the contribution of live aboard boat dwellers and continuous cruiser boats to London's waterways, and highlighting the moorings and facilities required along London's waterways may help provide opportunities for those communities residing on the waterways to choose an active, fulfilling life and are integrated into the community. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# 4. CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

# 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

# Objective 1 Equality and Inclusion

 Including reference to the contribution of live aboard boat dwellers and continuous cruiser boats to London's waterways, and highlighting the moorings and facilities required along London's waterways recognises the way in which the waterways are used by different communities, including traveller communities. Alongside other elements of the policy this can help to support the provision of suitable mooring infrastructure. This could have positive impacts in the short medium and longer term in helping the waterways to be inclusive and the wider objective of making London a fair and inclusive city. These impacts are already reflected in the matrix.

# Objective 3 Health and Health Inequalities

Requiring development proposals to also consider enhancements to waterway infrastructure may
help to improve physical infrastructure along the waterways, including making these spaces more
accessible for disabled Londoners, older Londoners and those with babies or very young children,
using push chairs for example who would benefit from improved access, potentially enhancing their
physical and mental wellbeing through providing better access to London's waterways. This is likely
to have positive impacts in the short, medium and longer term. These impacts are already reflected
in the matrix.

# Objective 8 Accessibility

Requiring development proposals to also consider enhancements to waterway infrastructure may
help to improve the physical infrastructure along the waterways, including making these spaces more
accessible for disabled Londoners, older Londoners and those with babies or very young children,
using push chairs for example who would benefit from improved access. This is likely to have positive
impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# Objective 9 Connectivity

Requiring development proposals to also consider enhancements to waterway infrastructure may
help to improve the physical infrastructure along the waterways, including improving connectivity of
and along these spaces for disabled Londoners, older Londoners and those with babies or very young
children, using push chairs for example who would benefit from improved access. This is likely to
have positive impacts in the short, medium and longer term. These impacts are already reflected in
the matrix.

#### Objective 18 Water resources and quality

 Requiring development proposals to also consider enhancements to waterway infrastructure may help to protect and enhance the character and use of London's waterways, making these spaces more accessible and welcoming for disabled Londoners, older Londoners and those with babies or very young children, using push chairs for example who would benefit from improved access. This is likely to have positive impacts in the short, medium and longer term. These impacts are already reflected in the matrix.

# SI16 Waterways – use and enjoyment

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA		1						1					1			ı	ı					1		
Short Term						n/a	n/a		+	+	?/+	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Medium Term						n/a	n/a		+	+	?/+	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Long Term						n/a	n/a		+	+	?/+	+	n/a	n/a	n/a	n/a	n/a	n/a	?/-	-	+	n/a	n/a	?/-
Direct / Indirect						n/a	n/a		D	D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	D	I/D	D	n/a	n/a	D
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		L/G L	L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	L/G L	L	n/a	n/a	L/G L
EQIA		_	_		,					_	_													
Short Term	+	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Medium Term	+	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Long Term	+	+	+	n/a	n/a	n/a	n/a	++	+	+	n/a	+	n/a	n/a	n/a		n/a	?/-	n/a	-	+	n/a	n/a	?
Direct / Indirect	ı	I	I	n/a	n/a	n/a	n/a	I/D	I/D	I/D	n/a	D	n/a	n/a	n/a		n/a	I/D	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a		n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	n/a	n/a	L/G L	L/G L	L/G L	n/a	L	n/a	n/a	n/a		n/a	L/G L	n/a	L/G L	L	n/a	n/a	L/G L
HIA				l	ı	l			l	1	ı	1		1	ı		l		1				1	
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	?/-		+	+	?/-		?/-
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	?/-		+	+	?/-		?/-
Long Term	+	+	++		n/a				n/a	n/a				n/a	n/a		n/a	?/-		+	+	?/-		?/-
Direct / Indirect	ı	ı	ı		n/a				n/a	n/a				n/a	n/a		n/a	D		ı	D	D		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	T/P		T/P	T/P	T/P		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	L/G L		L	L	L/G L		L/G L
CSIA																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/G L															

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- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> 9 Sustainable Infrastructure	<b>Policy:</b> SI17 Protecting and enhancing London's waterways
1. Initial assessment:	
a. brief summary of extent of changes and the policy	d whether the change is already reflected somewhere in
Minor changes have been made to the policy uses and ancillary uses along the waterway. No	and supporting text to clarify terminology around water related o material change
2. SEA (Strategic Environmental Assessm	nent)
2a. are the changes likely to have an impa	act on any of the objectives with SEA guide questions?
No change	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impa	act on any of the objectives with HIA guide guestions?

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No change

No change

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No change

# Chapter 10 Transport

<b>Chapter:</b> Chapter 10 – Transport	<b>Policy:</b> T1 Strategic Approach to Transport
Chapter: Chapter to Transport	Toney. It strategic Approach to Transport

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Minor amendments to part A to clarify the difference in how development plans and proposals should contribute to the delivery of the mode share target and strategic transport schemes in Table 10.1. This is further clarified through changes to paragraph 10.1.1.

The different mode share targets in 2015 and those in 2041 are clarified in figure 10.1 alongside the difference in the overall city-wide mode shift required from the current 63% to 80% for walking, cycling and public transport.

Additional text has been added to 10.1.3 to emphasise that the mayor will promote safe and clean freight functions.

#### 2. SEA (Strategic Environmental Assessment)

### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

#### Objective 7 – Design

Clarifications to the supporting text in relation to how development plans and development
proposals can support mode shift and transport schemes may help to support the implementation
of the policy is likely to help encourage people to walk and cycle and thereby reduce the need to
travel by motorized transport. This is likely to have positive impacts in the short, medium and
longer term. No change to matrix.

#### Objective 9 - Connectivity

• Clarifications to the supporting text in relation to how development plans and development proposals can support mode shift and transport schemes may help to support the implementation of the policy is likely to help with the achievement of modal shift and more sustainable modes of travel. This is likely to have positive impacts in the short, medium and longer term. No changes to matrix.

#### Objective 14 – Air Quality

Clarifications to the supporting text in relation to how development plans and development
proposals can support mode shift and transport schemes may help to support the implementation
of the policy could help to promote sustainable transport outcomes (e.g. walking, cycling and
public transport) which could help to reduce harmful air quality emissions associated with traffic
depending on local circumstances/implementation. This is likely to have positive impacts in the
short, medium and longer term. No changes to matrix.

#### 3. HIA (Health Impact Assessment)

## 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

#### Objective 3 - Health and Health Inequalities

Clarifications to the supporting text in relation to how development plans and development proposals can support mode shift and transport schemes may help to support the implementation of the policy and is likely to help encourage people to walk and cycle and thereby reduce the need to travel by motorized transport. Depending on local implementation this can help to provide opportunities for physical activity

and reduce health inequalities. A positive impact on the short, medium and long term is already identified in the matrix – no change.

#### Objective 14 – Air quality

Clarifications to the supporting text in relation to how development plans and development proposals can support mode shift and transport schemes may help to support the implementation of the policy and could help to promote sustainable transport outcomes (e.g. walking, cycling and public transport) which could help to reduce harmful air quality emissions and exposure associated with traffic depending on local circumstances/implementation. This is likely to have positive impacts in the short, medium and longer term. No changes to matrix.

#### 4. CSIA (Community Safety Impact Assessment)

# 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

#### Objective 9 - Connectivity

Clarifications to the supporting text in relation to how development plans and development proposals can support mode shift and transport schemes may help to support the implementation of the policy, thereby helping to promote sustainable transport outcomes and encouraging active travel. This will also be supported by additional text which supports safe and clean freight which can also help to encourage active, safe travel. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

#### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

#### Objective 14 - Air quality

Clarifications to the supporting text in relation to how development plans and development proposals can support mode shift and transport schemes may help to support the implementation of the policy and could help to promote sustainable transport outcomes (e.g. walking, cycling and public transport). The changes could contribute to improving poor air quality where they result in mode shift away from private car use. This may be particularly beneficial to younger Londoners as they are more likely than the general population to suffer negative consequences on their health caused by poor air quality<sup>1</sup>. Evidence also suggest that that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide<sup>2</sup>. Depending on the location and context, the amended policy may therefore have a positive impact for some BAME groups. These impacts are not considered to require any changes to the scoring matrix which identifies positive impacts in the short, medium and long term.

<sup>&</sup>lt;sup>1</sup> Aether (2013) Analysing Air Pollution Exposure in London.

<sup>&</sup>lt;sup>2</sup> Aether (2017) Updated Analysis of Air Pollution in London.

#### **T1 Strategic Approach to Transport**

IIA Element												IIA Obj	ectives	5										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA					1						ı	ı	•		1			1	1		1	l		
Short Term						0	+		+	+	+	+	+	+	0	+	0	n/a	n/a	n/a	n/a	+	+	+
Medium Term						+	+		+	+	+	+	+	+	0	+	+	n/a	n/a	n/a	n/a	+	+	+
Long Term						+	++		++	+	+	+	+	++	+	++	+	n/a	n/a	n/a	n/a	+	+	+
Direct / Indirect						ı	I/D		D	ı	ı	ı	ı	I/D	ı	I/D	I/D	n/a	n/a	n/a	n/a	I/D	I/D	I/D
Temporary / Permanent						T/P	T/P		Р	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P							
Local / Greater London / Wider Region / Global						L/G L/ W	L/G L/ W		L/G L/ W	n/a	n/a	n/a	n/a	L/G L/ W	L/G L/ W	L/G L/ W								
EQIA						. **			. **	_ ••			. **	_ **			. **	<u> </u>	l	L	l		•••	- **
Short Term	+	+	n/a	+	n/a	0	+/?	+	0	+	0	+	n/a	0	0		n/a	n/a	n/a	n/a	n/a	n/a	n/a	0
Medium Term	+	+	n/a	+	n/a	+	+/?	+	+	+	+	+	n/a	+	0		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	+	+	n/a	+	n/a	+	+/?	++	+	+	+	+	n/a	+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	ı	I/D	n/a	ı	n/a	ı	ı	I/D	ı	ı	ı	ı	n/a	ı	ı		n/a	n/a	n/a	n/a	n/a	n/a	n/a	ı
Temporary / Permanent	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	n/a	L/G L	n/a	L/G L	L/G L	L/G L	L/G L	L/G L/ W	L/G L	L/G L/ W	n/a	L/G L	L/G L/ W		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/G L
HIA		•	•	•				•												•				
Short Term	+	+	+		n/a				+	n/a				+	0		n/a	n/a		?	n/a	n/a		0
Medium Term	+	+	+		n/a				+	n/a				+	0		n/a	n/a		?	n/a	n/a		0
Long Term	+	+	+		n/a				+	n/a				++	+		n/a	n/a		?	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I		n/a	n/a		ı	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	T/P		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		n/a				L/G L/ W	n/a				L/G L/ W	L/G L/ W		n/a	n/a		L	n/a	n/a		L/G L
CSIA																•					•			
Short Term				?					+/?															
Medium Term				?					+/?															
Long Term				?					+/?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/G L					L/G L															

#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: 10 Transport	Policy: T2 Healthy Streets
1. Initial assessment:	
a. brief summary of extent of changes the policy (e.g. restructuring, clarification,	and whether the change is already reflected somewhere in strengthened policy on x)
	oporting text paragraph 10.2.2 was added. This is already reflected s, as well as elsewhere in the supporting text. Therefore, no
An additional reference to the Mayor's Vismentioned in supporting text paragraph 10	sion Zero ambition was inserted for clarity. This is already 0.2.8 and therefore no material change .
	vements against the indicators was removed in the supporting text. This clarification does not change the way the policy is meant to change.
2. SEA (Strategic Environmental Asse	essment)
2a. are the changes likely to have an ir	npact on any of the objectives with SEA guide questions?
No impact.	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an ir	npact on any of the objectives with HIA guide questions?
No Impact.	
4. CSIA (Community Safety Impact As	ssessment)
	npact on any of the objectives with CSIA guide questions?
No Impact.	,,,
· ·	
5. EqIA - Equality Impact Assessment	
a are the changes likely to have an im	pact on one or more protected characteristics?

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No Impact.

<b>Chapter:</b> Chapter 10 Transport	<b>Policy:</b> Policy T3 Transport capacity, connectivity and
	safeguarding

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Amendments to Policy T3 were made to clarify the relationship between Table 10.1 and the requirement to identify and safeguard land for transport schemes.

Part B2 was amended to provide clarity on the potential conditions under which land for transport should be protected: the general term 'transport functions and planned changes to capacity' was replaced by a clearer objective 'to provide the necessary strategic and local connectivity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing'.

Changes were made to Part C distinguishing between what is required of development plans and development proposals in order to make the policy more effective at delivering the appropriate protection/safeguarding. The supporting text was added to accordingly to clarify and distinguish the expectations of development plans from development proposals with respect to land safeguarding, and also provide further explanation of the purpose of Table 10.1 and guidance relating to their status/stage of development.

A reference to 'suitable mitigation' was also added to part C of the policy (to supplement 'adequate protection') to provide further clarity on the expectations for development proposals with respect to Table 10.1.

Minor factual clarifications, restructuring and other stylistic changes were made to Table 10.1, including to update scheme names and indicative costs and timescales.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 6 Sustainable Land Use

• By being more explicit on the protection of land for transport functions, development plans and proposals should be better able to integrate transport and land use and therefore make the best use of land. This is likely to result in positive short term, medium term and long term impacts, which are already reflected in the current scoring matrix.

#### Objective 7 Design

• Greater clarification on the safeguarding of space for local connections to active travel networks may result in developments that are designed to encourage people to walk and cycle. This is likely to have positive impacts in the short, medium and longer term. Matrix to be updated.

#### Objective 9 Connectivity

- Clarification in relation to safeguarding and the addition of 'suitable mitigation' should allow for
  protection of future transport connectivity to be preserved. The clarification with respect to
  sustainable deliveries and servicing may also help to protect infrastructure that could reduce freight
  traffic volumes and related congestion. This is likely to have positive impacts in the short, medium
  and longer term.
- The amendment to the bus transit entry in Table 10.1 expands the scope of pilots to outside of Opportunity Areas. This may result in connectivity improvements and modal shift away from private car use in a greater range of locations. This is likely to have positive impacts in the short, medium and longer term.

No change to the matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion and Objective 3 Health and Health Inequalities

Clarifications in relation to safeguarding (and ultimately) delivering appropriate active travel
infrastructure (or connections to existing infrastructure) should provide opportunities for people to
choose a physically active and fulfilling life. This is likely to have a minor positive impact in the
medium and long term. No change to the matrix.

#### Objective 9 Connectivity

• The clarification to part B2 of the policy to require identification and safeguarding of 'space' (in addition to 'sites') as well as a more explicit reference to local connectivity and walking capacity may lead to reduced congestion on public footpaths and pavements. This should have a minor positive impact in the short, medium and long term. Considering the policy as whole, these amendments would not change the overall scoring shown in the matrix: neutral in the short term (O), minor positive impact in the medium term (+) and significant positive impacts in the long term (++).

#### Objective 14 Air Quality

- Improvements to air quality may result from the mode shift (from car use) brought about by expanding consideration of bus transit pilots to outside of Opportunity Areas. This is likely to have minor positive impacts (+) in the short, medium and long term.
- The changes to the policy in regards to clarification on the safeguarding requirements for future public transport, walking and cycling connectivity and capacity should ensure that sustainable travel options are designed into developments, thus contributing to air quality improvements (from mode shift away from private car use). This should have minor positive impacts, particularly in the medium and longer term.
- Overall, when considered as a whole, the policy is likely to have a neutral impact (O) in the short and medium term and minor positive impact (+) in the long term. This is already reflected in the scoring matrix.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 Connectivity

• The clarifications made to Part B2 now more explicitly reference local connectivity and walking and cycling capacity. This should contribute to encouraging active travel by protecting the land needed to create safe, attractive routes. This change is likely to have a minor positive impact (+); but when considered as a whole, the policy is likely to have be neutral in the short term (O), and have a minor positive impact in the medium and long term (+).

#### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• The clarifications made to Parts B2 and C of the policy should make the policy more effective at delivering appropriate safeguarding for sustainable transport infrastructure. As set out in the amendments to Part B2, this may include the protection of land/space for the delivery of public transport and active travel connectivity. The delivery of such infrastructure may ultimately contribute to increased levels of physical activity, which would be particularly beneficial to older and younger

Londoners, who are less likely than other age groups to meet recommended levels of physical activity<sup>1</sup>. In the short term, the safeguarding and delivery of cycling infrastructure may be less beneficial to older Londoners than other age groups as they are less likely to cycle<sup>2</sup>. However, in the medium and longer the protection of land/space for cycling infrastructure should help to increase the proportion of older Londoners who regularly cycle.

• The clarification (in Table 10.1) that bus transit pilots could apply not just within OAs but across London could ensure that more people benefit from this type of scheme. Although bus transit schemes may differ in nature from more typical bus routes, they may be particularly beneficial to older Londoners (the bus being the mode used the most by older Londoners<sup>3</sup>) and women (65% of women use the bus at least once a week compared to 58% of men<sup>4</sup>).

These impacts are not considered to require any changes to the scoring matrix.

#### Objective 14 Air Quality

• The more effective safeguarding and delivery of sustainable transport infrastructure and the wider roll-out of bus transit pilots could contribute to improving poor air quality where they result in mode shift away from private car use. This may be particularly beneficial to younger Londoners as they are more likely that the general population to suffer negative consequences on their health caused by poor air quality<sup>5</sup>. Evidence also suggest that that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide<sup>6</sup>. Depending on the location and context, the amended policy may therefore have a positive impact for some BAME groups.

These impacts are not considered to require any changes to the scoring matrix.

<sup>&</sup>lt;sup>1</sup> British Heart Foundation (2015) Physical Activity Statistics

<sup>&</sup>lt;sup>2</sup> Only 8 per cent of Londoners aged 65 or above *sometimes* use a bike to get around London, compared to 17 per cent of all age groups. Transport for London (2015) Travel in London: Understanding our Diverse Communities.

<sup>&</sup>lt;sup>3</sup> Transport for London (2015) Travel in London: Understanding our Diverse Communities.

<sup>&</sup>lt;sup>4</sup> Ibid

<sup>&</sup>lt;sup>5</sup> Aether (2013) Analysing Air Pollution Exposure in London.

<sup>&</sup>lt;sup>6</sup> Aether (2017) Updated Analysis of Air Pollution in London.

#### T3 Transport Capacity, Connectivity and Safeguarding

IIA Element												IIA Obj	ective	s										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA	•			•																				
Short Term						+	?/+		+	+	+	n/a	n/a	0	0	0	0	n/a	n/a	?	n/a	n/a	n/a	0
Medium Term						+	?/+		+	+	+	n/a	n/a	0	0	+	0	n/a	n/a	?	n/a	n/a	n/a	+
Long Term						+	?/+		+	+	+	n/a	n/a	+	+	+	+	n/a	n/a	?	n/a	n/a	n/a	4
Direct / Indirect						ı	I/D		I/D	I/D	ı	n/a	n/a	ı	ı	ı	I/D	n/a	n/a	I/D	n/a	n/a	n/a	
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	Р	T/P	n/a	n/a	Р	n/a	n/a	n/a	T/
Local / Greater London / Wider Region / Global						L/G L/ W	L/G L		L/G L/ W	L/G L/ W	L/G L/ W	n/a	n/a	L/G L/ W	L/G L/ W	L/G L	L/G L	n/a	n/a	L/G L/ W	n/a	n/a	n/a	L/
EQIA																								
Short Term	+/?	+/?	0	0	0	0	n/a	+	+	+	+	n/a	n/a	0	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	Ĩ
Medium Term	+/?	+/?	+	+	+/?	+	n/a	+	+	+	+	n/a	n/a	0	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	Ĩ
Long Term	+/?	+/?	+	+	+/?	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	1
Direct / Indirect	ı	I	I	I	n/a	I	n/a	I	I	I	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	T,
Local / Greater London / Wider Region / Global	L/G L/ W	L/G L/ W	L/G L	L/G L	n/a	L/G L/ W	n/a	L/G L	L/G L/ W	L/G L/ W	L/G L/ W	n/a	n/a	L/G L/ W	n/a		n/a	n/a	n/a	n/a	L/G L	n/a	n/a	L/
HIA																								
Short Term	+	+	+		0				0	n/a				0	0		n/a	n/a		?	n/a	n/a		0
Medium Term	+	+	+		+/?				+	n/a				0	0		n/a	n/a		?	n/a	n/a		C
Long Term	+	+	+		+/?				++	n/a				+	+		n/a	n/a		?	n/a	n/a		C
Direct / Indirect	I	I	I		n/a				D	n/a					I		n/a	n/a		I/D	n/a	n/a		
Temporary / Permanent	T/P	T/P	T/P		n/a				Р	n/a				T/P	T/P		n/a	n/a		Р	n/a	n/a		T,
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L		n/a				L/G L/ W	n/a				L/G L/ W	L/G L/ W		n/a	n/a		L/G L/ W	n/a	n/a		L
CSIA			<u> </u>												. **					. **				_
Short Term				n/a					0															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/G L															

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#### **Objectives**

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

<b>Chapter:</b> Chapter 10 – Transport	<b>Policy:</b> T4 Assessing and mitigating transport impacts

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Minor amendments to part B to clarify transport assessments should be submitted in line with relevant national/local guidance, alongside the inclusion of 'statements' to reflect different terminology for different tiers of guidance. No material change.

A clarification was also made that TAs should be submitted to ensure impacts (rather than any impacts) on the transport network are assessed to help make the policy more effective. No material change.

An updated link to relevant Transport for London guidance was added as a footnote. - No material change.

#### 1.b Panel Recommendations

Following the Panel's recommendation, it is proposed to part B of the policy for documents supporting applications to 'have regard to' rather than be 'in accordance with' relevant Transport for London Guidance. This change in emphasis is not considered to have any impacts in relation to the IIA objectives previously assessed or result in any changes to the scoring matrix.

#### 2. SEA (Strategic Environmental Assessment)

2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

No Impacts

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No Impacts

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No Impacts

Chapter: 10 Transport	Policy: T5 Cycling

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Several clarifications were made to the policy and supporting text:

- Part F of the policy was simplified with regard to how it relates to table 10.1 and appended to part A
   No material change.
- The latter part of A2 which dealt with design was added as a standalone policy point (new AA). No material change.
- Parts D and E were consolidated into one point to avoid duplication. No material change.
- Several changes were made to table 10.2 to make it simpler to use, with further clarification added about the exception to the minimum requirements set out in the policy. No material change.
- The title of figure 10.2 was changed for clarification about where higher minimum cycle parking standards apply, this was complemented by changes to paragraph 10.5.4 about locations where higher standards apply due to the high cycling potential. No material change.

#### 1.b Panel Recommendations

The Panel recommended changes to cycle parking standards for students and older persons. The cycle parking standard for student accommodation is to be reduced from 1 space per studio to 0.75 spaces per bedroom, whilst for specialist older persons housing the standard will reduce from the equivalent of 1 space per studio unit to 1 space per 10 bedrooms.

The impacts in relation to older persons cycle parking are addressed under the relevant objectives below. For student accommodation, whilst there would be a slight reduction in the standard, overall the changes are not considered to change the impacts on the objectives already identified. Schemes with these uses make up a small proportion of development overall and would still provide cycle parking for the majority of occupants and be expected to contribute sustainable transport outcomes in line with other policies in the Plan.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No Impact

#### Objective 9 Connectivity

The Panel's recommendation to reduce the cycle parking standard for specialist older persons' housing and student accommodation may have the effect of reducing modal shift to more sustainable forms of travel. However, given this type of development represents a relatively small proportion of all development in London, alongside the fact that some cycle parking will still be provided alongside other measures to promote sustainable transport the overall impact on modal shift overall is likely to be minor. The impact identified is therefore not considered to warrant a change to the scoring matrix.

#### Objective 14 Air Quality

Lowering the cycle parking standard for older persons' and student accommodation may result in less people cycling and potentially using more polluting modes of transport. However, the draft Plan contains complementary policies – such as the Healthy Streets Approach and restrictive car parking policies – that are likely to encourage walking and public transport use (rather than private car use). Therefore, any overall impact on air quality is likely to be relatively small and no change to the scoring matrix is required.

#### Objective 16

As discussed above under Objective 14, the use of more polluting modes instead of cycling may hinder reducing transport's contributions to  $CO_2$  emissions. Similar to the assessment of Objective 14, the draft Plan's focus on walking and public transport use should provide some level of mitigation for any emissions

resulting from the lowering cycle parking standard for older persons' and student accommodation. Additionally, given that older persons' housing and student accommodation represents a relatively small proportion of new development in London, any impact is likely to be minor. For these reasons, no change to the scoring matrix is required.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No Impact

Objective 1 Equality and Inclusion and Objective 2 Social Integration

The Panel's recommendation to lower the cycle parking standard for older persons may deter this group from taking up cycling and reduce the opportunities to choose an active, fulfilling life. However, the proposed standard of 1 space per 10 bedrooms is still likely to provide for potential growth in the current level of cycling amongst older people: currently, 4% of older Londoners (aged 65+) have used a bike to get around London in the last 12 months<sup>1</sup>. Overall, no change to the scoring matrix is necessary.

#### Objective 3 Health and Health Inequalities

Providing less cycle parking for specialist older persons housing - as per the Panel's recommendation - may hinder the take-up of cycling amongst this group. Given that older people are more likely to be physically inactive or demonstrate low levels of physical activity<sup>2</sup>, the recommendation may reduce the likelihood that this inequality in the level of physical activity is reduced. Despite the potential reduced benefits for older people, the policy retains the potential to tackle health inequalities more generally, and so no change to the scoring matrix is proposed.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

#### 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

Older Londoners are less likely to cycle compared to all age groups<sup>3</sup>, however there is scope for this to increase. The Panel's recommendation to reduce the cycle parking standard for specialist older persons accommodation may result in older people who live in such developments not being presented with the same opportunity to cycle as those who do not.

Although the Panel's recommendations would result in a reduction to the standard previously proposed, the standards are a minimum and will still result in positive outcomes through potentially helping to increase the level of cycling in older people. The standards also have the potential to be increased where this is needed. Cycling provision on schemes will be in addition to other inclusive design and transport measures which can also help to promote connectivity, accessibility and active travel. Overall the policy still provides opportunities for older people to cycle and therefore doesn't affect the overall scoring of this objective.

<sup>3</sup> Travel in London: Understanding our Diverse Communities, 2019, Transport for London.

<sup>&</sup>lt;sup>1</sup> Travel in London: Understanding our Diverse Communities, 2019, Transport for London.

<sup>&</sup>lt;sup>2</sup> British Heart Foundation (2015) Physical Activity Statistics

#### Objective 3 Health and health inequalities

As discussed above in the Health Impact Assessment, older people are more likely to be inactive or report lower levels of physical activity. Therefore, the Panel's recommendation to lower the cycle parking standard for specialist older may hinder the reduction of inequalities in physical wellbeing. Despite this, the Panel's proposed standard is still likely to provide room for growth in the current level of cycling amongst older people and, alongside complementary policies such as T2 Healthy Streets, contribute to encouraging more active travel. Furthermore, the policy would still contribute to tackling health inequalities experienced by other groups. Considering this together, no change to the scoring matrix is proposed.

Chapter: Chapter 10 Transport Policy: T6 Car Parking

#### 1. Initial assessment:

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

- The footnote and supporting text relating to electric vehicle charging infrastructure and pedestrian amenity and was moved into the policy text to improve the effectiveness of the policy and ensure appropriately designed charge points.
- The requirement for motorcycle parking to counts towards the maximum car parking spaces was moved from the supporting text to a clause in the policy.
- Clarifications made to Part I of the policy regarding car parking provision where sites are redeveloped
- Supporting text was added to provide guidance on the application of parking standards in outer London Opportunity Areas. The addition sets out the approach to applying the standards flexibly (through an OAPF), without the overall quantum exceeding the relevant standard.

#### 1.b Panel Recommendations

The Panel recommended a clarification that the first part of Part I of the policy does not apply to the redevelopment of industrial sites. Additional supporting text has been added to clarify this will be considered on a case by case basis consistent with paragraph 10.6.14A which clarifies the approach to operational and worker parking. This amendment is not considered to have material impacts in relation to the different IIA objectives previously identified given the overall approach to industrial parking that is set out in policy T6.2 (part C) and the supporting text.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• The strengthening of the policy with respect to the pedestrian environment and electric vehicle charge points should make the policy more effective at maintaining accessible footways when delivering charging infrastructure. This should have a positive impact on the inclusivity of streets, keeping them accessible to a variety of users. The strengthening of this aspect of the policy could also have positive impacts on conserving the visual amenity of streets and the wider public realm/townscape. The changes are likely to a have a minor positive impact (+) on the objective. Overall, when considering the policy as a whole, it is likely to have a neutral impact (O) in the short term, and a minor positive impact (+) in the medium and long term.

No change to the matrix.

Objective 9 Connectivity

• The approach to parking in outer London Opportunity Areas may increase traffic volumes in some areas (in less well-connected areas where parking can be above the relevant maximum), but at the same time, reduce traffic volumes in other areas (in areas of higher PTALs, where parking standards would be expected to be below the relevant maximum standards in order to compensate). Overall the additions would have no impact on the objective compared to the Minor Suggested Changes version of the policy. Therefore, when considering the policy as a whole, the current scoring matrix would remain unchanged: a neutral impact (O) in the short term and minor positive impacts (+) in the medium and long term.

No change in the matrix.

#### Objective 14 Air Quality

- As discussed above, in outer London Opportunity Areas, in areas where parking provision is provided above the relevant standard, there may be some worsening of local air quality resulting from increased car use, and therefore likely to be a minor negative impact (-) at the local scale (L). Conversely, where provision is below the relevant standard, there may be air quality improvements. This is likely to lead to minor positive impacts (+) at the local scale (L)
- Overall across an OA as a whole, given that paragraph 10.6.2A prevents provision across an OA being higher than relevant standard, this should have a neutral impact (O).

Considering the policy as a whole, the impacts are likely to be neutral (O) in the short term, and minor positives (+) in the medium and long term. No change in the matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

Objective 1 Equality and Inclusion

• The strengthening of the policy text regarding pedestrian amenity should ensure the delivery of electric vehicle charge points does not compromise the accessibility of London's streets. This may be important for Londoner's who are mobility impaired (particularly those who use wheelchairs) or those that are encumbered (including parents with buggies). The change is therefore likely to have a minor positive impact in the short, medium and long term.

No change in the matrix.

Objective 9 Connectivity

• The strengthening of the policy text regarding pedestrian amenity and electric vehicle charge points should make the policy more effective at delivering street environments that are less cluttered and congested. This should have a minor positive impact in the short, medium and long term. Overall, it is not considered that this change would result in any change to the scoring matrix.

No change in the matrix.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide guestions?

Objective 9 Connectivity

The strengthening of Part EA of the policy with respect to pedestrian amenity should contribute to
creating safe, attractive routes for active travel (for example, by lowering the risk of personal injury
caused by tripping/colliding with electric vehicle charging infrastructure). This is likely to have a
minor positive impact on encouraging active travel in the short, medium and long term; but overall,
there would be no change to the scoring of the policy.

No change in the matrix.

#### 5. EqIA - Equality Impact Assessment

- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion and Objective 7 Design

• The strengthening of the policy text regarding pedestrian amenity should ensure the delivery of electric vehicle charge points does not compromise the accessibility of London's streets, helping to ensure a barrier free environment and ease of use of the built environment. This may be important for Londoner's who are mobility impaired (particularly those who use wheelchairs) or those that are encumbered (including parents with buggies). The change is therefore likely to have a minor positive impact in the short, medium and long term but overall, there would be no change to the scoring of the matrix.

No change in the matrix.

#### Objective 9 Connectivity

• The strengthening of the policy text regarding pedestrian amenity and electric vehicle charge points should make the policy more effective at delivering street environments that are less cluttered and congested. This may be important for Londoner's who are mobility impaired (particularly those who use wheelchairs) or those that are encumbered (including parents with buggies). This should have a minor positive impact in the short, medium and longer term but overall there would be no change to the scoring of the matrix.

No change in the matrix.

Chapter: Chapter 10 Transport	<b>Policy:</b> Policy T6.1 Residential Parking

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

T6.1 G was amended to make explicitly clear that the non-residential disabled persons parking requirement is one space per dwelling for the stated percentages of total dwellings. This was previously in the policy but was omitted through MSC revisions.

Clarifications were made to T6.1 G2 with regard to when additional spaces not provided at the outset are requested for conversion and that these should be secured at the planning stage.

An additional paragraph was added to the supporting text to clarify the approach to be taken for disabled persons parking provision that is not provided from the outset. In particular, this clarified how disabled persons car parking should be approached in car-free development (including the related issue of onsite/on-street provision), and how and where it should be justified. The amendment also reinforced the application of inclusive design principles to disabled persons parking provision by explicit reference to Policy D3 and GG1.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide guestions?

Objective 6 Sustainable Land Use

• The clarification of on-site/on-street provision in the supporting text is likely to encourage a more comprehensive consideration of land use. This is likely to have a minor positive impact, which is already reflected in the scoring matrix.

#### Objective 7 Design

• The addition to T6.1 G2 to secure the conversion/addition of further disabled persons car parking at the planning stage should help ensure that this is delivered together with the inclusive outcomes this brings. The addition to the supporting text of a reference to inclusive design principles is likely to ensure that an inclusive design approach is embedded in the planning and designing of disabled persons car parking provision. This is likely to have a minor positive impact, particularly in the medium and longer term. These impacts are already reflected in the scoring matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and Inclusion

• By securing the conversion/addition of further disabled persons parking at the outset, this is likely to ensure that the parking is available to disabled Londoners when it is needed, and will contribute to addressing the diverse needs of the population. This is likely to have a minor positive impact in the short, medium and long term. This is already reflected in the scoring matrix.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

n/a – no relevant impacts identified.

#### 5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion and Objective 2 Social Integration

- By ensuring that further provision of disabled persons car parking is secured at the planning stage,
  this could help to ensure that spaces are available when needed, potentially increasing housing
  choice and making it more convenient for disabled people to find a home. By potentially positively
  impacting on disabled Londoners' housing choice, the FSC could also potentially be beneficial in
  terms of reducing social exclusion by increasing the likelihood that disabled people can locate
  somewhere where they have existing community ties (through the creation of housing which meets
  their requirements if they rely on having access to a disabled persons parking bay).
- The addition of an explicit reference to inclusive design principles in the supporting text is likely to encourage this approach to be taken when planning and designing disabled persons car parking spaces, helping to create a barrier free environment for disabled people who require access to disabled persons parking.
- While these changes are likely to have a minor positive impact in the short, medium and long term, overall, they would not affect the current scoring matrix.

#### Objective 5 Housing Supply, Quality, Choice and Affordability

- The additional supporting text referring to inclusive design principles should help to ensure that a high quality, convenient, barrier-free experience is provided for disabled people who rely on a car to get around. This is likely to have a minor positive impact in the short, medium and long term.
- Providing more certainty over the provision of disabled persons parking beyond that which is provided from the outset could increase the level of housing choice for disabled Londoners who require a disabled persons parking bay where they live. This is likely to have a minor positive impact in the short and medium and long term.
- Overall, considering the policy as a whole, the impacts identified from the FSCs would not result in a change to the current scoring of the objective.

#### Objective 3 Health and Health Inequalities

• The potential effect of creating more housing suitable for disabled people who require a disabled persons parking bay where they live may work to reduce social exclusion by increasing the likelihood that disabled people can locate somewhere where they have existing community ties (through the creation of housing which meets their requirements, if they rely on having access to a disabled persons parking bay). This could also help reduce feelings of isolation for this group, which may also help to lessen mental health and wellbeing inequalities (disabled people have a higher risk of having poor mental health¹). This is likely to have a minor positive impact in the short, medium and long term. It is considered that no change to the current scoring matrix is needed.

#### Objective 7 Design

• The FSC should contribute to providing more certainty over the provision of disabled persons car parking which is not provided at the outset (but created when the need arises) and consequently help to increase housing choice for disabled people who require a disabled persons parking bay where they live. This is likely to represent a minor positive impact in terms of widening the choice of areas a disabled person might find suitable housing in and therefore promoting social integration more generally. No change to the overall scoring of the policy against this objective was deemed necessary.

<sup>&</sup>lt;sup>1</sup> London Health Inequalities Strategy 2018, Mayor of London

#### Objective 8 Accessibility

By being clearer that the additional disabled persons parking which is not provided at the outset but
is created when the need arises should be secured at the planning stage, Policy T6.1 should help to
ensure the adequate disabled persons parking is provided for disabled people who require a disabled
persons parking bay where they live; potentially increasing access to access key services and
facilities. No change to the scoring matrix for either objective was considered necessary, as overall,
the impact of the policy would remain the same.

#### Objective 10 Economic Competitiveness and Employment

• By being clearer that the additional disabled persons parking which is not provided at the outset but is created when the need arises and should be secured at the planning stage, Policy T6.1 should help to ensure that adequate disabled persons parking is provided for disabled people who require a disabled persons parking bay where they live; potentially increasing access to access key services and employment opportunities. This may positively contribute to reducing barriers to employment for disabled people, and therefore may help to close the inequality in employment rates between disabled and non-disabled Londoners (26% of 25-64 year old disabled Londoners work full or part-time compared to 81% of non-disabled Londoners2). This is likely to result in a change to the matrix from n/a to positive in the short, medium and long term. Matrix to be updated.

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<sup>&</sup>lt;sup>2</sup> Travel in London: Understanding our Diverse Communities 2019, Transport for London

#### **T6.1 Residential Parking**

IIA Element												IIA Obj	ectives	6										
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA		,		,																				
Short Term						+	0		0	n/a	n/a	n/a	n/a	0	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	n/a	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	ı	I/D	ı	ı	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/G L	L/G L		L/G L	n/a	n/a	n/a	n/a	L	L	L/G L	L	n/a	n/a	n/a	n/a	n/a	n/a	L/G L
EQIA																								
Short Term	0	0	0	?	-/?	0	0	0	?	+	n/a	n/a	n/a	0	0		0	n/a	n/a	n/a	n/a	n/a	n/a	0
Medium Term	+	+	+	0	-/?	+	+	+	+	+	n/a	n/a	n/a	+	0		+	n/a	n/a	n/a	n/a	n/a	n/a	0
Long Term	++	++	+	+	-/?	++	+	+	+	+	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	ı	I/D	I/D	I/D	I/D	I/D	n/a	n/a	n/a	ı	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/G L	L/G L	L	L	L/G L/ W	L	L	L	L/G L	L/G L	n/a	n/a	n/a	L/G L	L/G L		L/G L	n/a	n/a	n/a	n/a	n/a	n/a	L/G L
HIA		•														•								
Short Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		0
Medium Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		0
Long Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	D	D	D		ı				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	Р	Р	Р		T/P				Р	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L/G L/ W				L	n/a				L/G L	L/G L		n/a	n/a		n/a	n/a	n/a		L/G L
CSIA																								
Short Term				0					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/G L															

**Objectives** 

- 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
- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: Chapter 10 – Transport Policy: T6.2 Office parking

#### 1. Initial assessment:

a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Additional paragraph added to the reasoned justification to clarify how parking for industrial uses should have regard to the office parking standards alongside employed densities for commuter parking, clarifying that this will be determined on a case-by-case basis, and operational parking considered separately. These amendments are not considered to have material impacts in relation to the different IIA objectives given the overall approach to industrial parking that is set out in part C of the policy.

- 2. SEA (Strategic Environmental Assessment)
- 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

No impact

- 3. HIA (Health Impact Assessment)
- 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impact

- 4. CSIA (Community Safety Impact Assessment)
- 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impact

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

No impact

<b>Chapter:</b> Chapter 10 – Transport	<b>Policy:</b> T6.3 Retail parking
1. Initial assessment:	
a. brief summary of extent of changes and whe the policy (e.g. restructuring, clarification, strengths	ther the change is already reflected somewhere in ened policy on x)
Amendment to policy reference. No material change	
2. SEA (Strategic Environmental Assessment)	
2a. are the changes likely to have an impact on	any of the objectives with SEA guide questions?
No impact	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact on	any of the objectives with HIA guide questions?
No impact	
4. CSIA (Community Safety Impact Assessmen	t)
4a. are the changes likely to have an impact on	any of the objectives with CSIA guide questions?
No impact	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on o	one or more protected characteristics?
b. If yes, summarise the impact on the protect	ed characteristic(s).
No impact	

<b>Chapter:</b> Chapter 10 – Transport	<b>Policy:</b> T6.4 Hotel and leisure uses parking
1. Initial assessment:	
a. brief summary of extent of changes and who the policy	ether the change is already reflected somewhere in
Very minor change to wording in Part A of the polic change.	ry with reference to how PTAL is referred to. No material
2. SEA (Strategic Environmental Assessment)	
2a. are the changes likely to have an impact or	any of the objectives with SEA guide questions?
No impact	
3. HIA (Health Impact Assessment)	
3a. are the changes likely to have an impact or	any of the objectives with HIA guide questions?
No impact	
4. CSIA (Community Safety Impact Assessmen	nt)
4a. are the changes likely to have an impact or	any of the objectives with CSIA guide questions?
No impact	
5. EqIA - Equality Impact Assessment	
a. are the changes likely to have an impact on	one or more protected characteristics?
b. If yes, summarise the impact on the protect	ted characteristic(s).

Chapter: Chapter 10 Transport	<b>Policy:</b> Policy T6.5 Non-residential disabled persons
	parking

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Part A of the policy which sets out the minimum number of parking bays was merged with part B for clarity/ease of reference as this element of the policy refers to table 10.6 where the overall standards for different non-residential uses are set out. This does not result in any material change to the policy.

Clarifications were made to T6.5 E to clarify that the process for converting bays should be set out in a Parking Design and Management Plan and that these should be secured at the planning stage.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• The addition to T6.5 E to secure the conversion/addition of further disabled persons car parking at the planning stage should help ensure that this is delivered together with the inclusive outcomes this brings. This is likely to have a minor positive impact in the short, medium and longer term. Considering the policy as a whole, these impacts are not considered to affect the current scoring against this objective.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and Inclusion

• By securing the conversion/addition of further disabled persons parking at the outset, this is likely to ensure that the parking is available to disabled Londoners when it is needed, and will contribute to addressing the diverse needs of the population. This is likely to have a minor positive impact in the short, medium and long term. This is already reflected in the scoring matrix.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

n/a - no relevant impacts identified.

#### 5. EqIA - Equality Impact Assessment

a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion and Objective 2 Social Integration

• By ensuring that further provision of disabled persons car parking is secured at the planning stage, this could help to ensure that spaces are available when needed making it easier for disabled people to visit different destinations. Disabled Londoners travel less frequently than non-disabled Londoners (1.9 journeys per weekday compared with 2.5 for non-disabled Londoners¹), perhaps suggesting an increased likelihood of becoming socially isolated. The FSC could therefore potentially be beneficial in terms of reducing social exclusion by increasing the likelihood that disabled people feel they can visit a range of destinations including workspaces, community and leisure facilities.

<sup>&</sup>lt;sup>1</sup> Travel in London: Understanding our Diverse Communities 2019, Transport for London.

Whilst this could result in a minor positive impact, positive impacts are already identified in the matrix in the short, medium and long term – no further changes required.

#### Objective 3 Health and Health Inequalities

• Helping to secure disabled persons parking bays in places of work, community and leisure facilities may help reduce social exclusion, reduce feelings of isolation for this group, which may also help to lessen mental health and wellbeing inequalities (disabled people have a higher risk of having poor mental health²). This is not likely to result in any further changes to the matrix which identified positive impacts in the medium and longer term.

Objective 8 Accessibility and Objective 10 Economic Competitiveness and Employment

• By being clearer that the additional disabled persons parking which is not provided at the outset but is created when the need arises being secured at the planning stage, Policy T6.5 should help to ensure the adequate disabled persons parking is provided for disabled people who require a disabled persons parking bay at workplaces and other important destinations (including community and leisure facilities); potentially increasing access to access key services and employment opportunities. This is particularly important given the disparity in employment rates between disabled and non-disabled Londoners (26% of 25 to 64-year-old disabled Londoners are in full or part-time employment compared to 81% for non-disabled Londoners of the same age group<sup>3</sup>). Positive impacts are already identified in the short, medium and long term for this policy – no further changes to the matrix required.

<sup>3</sup> Travel in London: Understanding our Diverse Communities 2019, Transport for London.

<sup>&</sup>lt;sup>2</sup> London Health Inequalities Strategy 2018, Mayor of London.

Chapter: Chapter 10 Transport	<b>Policy:</b> T7 Deliveries, servicing and construction

#### a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Policy strengthened through the addition of road danger to the objectives that development plans/area strategies should be working towards, through T7 A3.

Clarified requirements for support of consolidation facilities in Part E to make clear that the requirements for support would be considered in the round. Amendment was made to clarify and qualify the requirement for mode shift to rail/water in T7 E5, to ensure the policy is effective and clear about varying site contexts.

The definition of sustainable freight was clarified in T7 F, as well as in the supporting text in order to provide a clearer idea of the policy's objectives and to align with the terminology used in the Mayor's Freight and Servicing Action Plan.

The issue of kerbside/on-carriageway loading, previously explained in the supporting text, has been moved up to the policy text in order to clarify Part F. The amended supporting text now provides further clarification in line with the amendments made to the policy text. These changes should improve the effectiveness of the policy by acknowledging and explaining the conditions under which on-street provision of space for servicing, storage and deliveries would be acceptable.

The spatial description of potential consolidation facilities was removed from the supporting text.

Clarifications were also made in the supporting text to clarify the requirements for CLPs/DLPs to be in line with TfL guidance and also make clear the guidance on using TfL's freight tools.

#### 1.b Panel Recommendations

Following the Panel recommendations, a couple of changes are proposed to policy T7. One change in wording was proposed to paragraph 10.7.1 to refer to waterways rather than rivers, this is not considered to change the impacts on the objectives already identified. An additional change is proposed to part A of the policy to add the objective of sustainable freight movement from the supporting text to the beginning of the policy in relation to development plans and development decisions. Whilst this could be argued to be a slight strengthening of the policy, given the previous emphasis on sustainable freight in the supporting text, additional clarifications of this through further suggested changes and other elements of the policy that will help to deliver this, it is not consider to change the impacts in relation to objectives already identified or result in further changes to the scoring matrix.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 7 Design

• The strengthening of the policy with respect to the objective of reducing road danger is likely to help improve the safety of the public realm. The clarification of the approach to on-street provision of space for servicing, storage and deliveries in the policy text should result in clearer instruction on the circumstances in which on-street provision would be acceptable. The related amendments to the supporting text should contribute to minimising the impacts on the public realm for pedestrians and cyclists. This is likely to have positive impacts in the short, medium, and longer term.

Matrix to be updated.

#### Objective 9 Connectivity

• The removal of the requirement for consolidation centres to explicitly 'reduce traffic volumes within London' is mitigated by the clarification that the impacts on the road network must be acceptable. This, coupled with the remaining requirements in T7 E 3-5 should ensure that the policy continues to work towards reducing traffic volumes and congestion. Therefore, this would have a neutral impact (O) on achieving the objective across the short, medium and long term. When considering the policy as a whole, the scoring matrix would therefore be unchanged with a neutral impact (O) in the short-term, a minor positive impact (+) in the medium term and a significant positive impact (++) in the long term.

No Change to the matrix.

Objective 14 Air Quality and Objective 23 Materials and Waste

• The clarification of the term 'sustainable freight' to mean 'safe, clean and efficient' in the policy and supporting text should give potential development plans and proposals a clearer idea of the objectives of the policy (in terms of improving air quality and increasing the efficiency of freight movement). While this may make the objectives of the policy clearer, the slight positive impact (+) of this change (in the short, medium and long term) would be marginal and therefore the overall scoring of the policy for these objectives are unaffected.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 9 Connectivity

• As above in the SEA, the clarifications relating to on-street provision/loading in the carriageway should help to ensure that congestion on public pavements and footpaths is adequately managed and conflicts with pedestrians and cyclists minimised. Overall, this would result in a minor positive impact in the short, medium and long term.

Matrix to be updated.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 Connectivity

The more explicit references to road danger should ensure that road safety is better considered in development plans and proposals, which in turn can help to promote active travel. Overall this would result in a minor positive impact in the short, medium and long term.

Matrix to be updated.

5. EqIA - Equality Impact Assessment

#### a. are the changes likely to have an impact on one or more protected characteristics?

#### b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and Inclusion

• The changes made to clarify the requirements regarding on/off-street provision of space for deliveries and servicing should help to ensure a barrier-free environment, which could be particularly beneficial for older Londoners for whom walking is the most commonly used transport option<sup>1</sup> and

<sup>&</sup>lt;sup>1</sup> Travel in London: Understanding our diverse communities, TfL, 2019

disabled Londoners for whom a more accessible public transport system will make it easier to travel more spontaneously and independently<sup>2</sup>. The changes would likely have a minor positive (+) impact in the short, medium and longer term, which is already reflected in the scoring matrix.

No change to matrix.

#### Objective 8 Accessibility

As above, the clarifications relating to on/off-street provision of space for deliveries and servicing, should contribute to helping to reduce barriers in the public realm, including in relation to accessing public transport and promoting active travel which could be particularly beneficial for older Londoners for whom walking is the most commonly used transport option<sup>3</sup> and disabled Londoners for whom a more accessible public transport system will make it easier to travel more spontaneously and independently<sup>4</sup>. Positive impacts in the short, medium and longer term are already reflected in the scoring matrix.

No change to matrix.

<sup>&</sup>lt;sup>2</sup> Travel in London report 11, TfL, 2019

<sup>&</sup>lt;sup>3</sup> Travel in London: Understanding our diverse communities, TfL, 2019

<sup>&</sup>lt;sup>4</sup> Travel in London report 11, TfL, 2019

#### T7 Deliveries, servicing and construction

IIA Element											]	IIA Ob	jective	es										
CFA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Short Term						<u> </u>		1			l				<u> </u>		l		l			l		
SHOIL TEITH						n/a	+		0	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	0	+/?
Medium Term						n/a	+		+	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	+/?
Long Term						n/a	+		+	++	n/a	n/a	n/a	+	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	+
Direct / Indirect						n/a	I/D		I/D	D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	n/a	I/D	I/D
Temporary / Permanent						n/a	T/ P		T/ P	T/ P	n/a	n/a	n/a	T/ P	n/a	T/ P	n/a	n/a	n/a	T/ P	n/a	n/a	T/ P	T/P
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	GL /W	n/a	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	n/a	L/ GL /W	L
EQIA		•			•						•					•							•	
Short Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	0	+	n/a	n/a	n/a	+/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Medium Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+	+	+	n/a	n/a	n/a	+/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Long Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Direct / Indirect	I/D	n/a	n/a	I/D	n/a	n/a	n/a	I	I	D	n/a	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/ P	n/a	n/a	T/ P	n/a	n/a	n/a	T/ P	T/ P	T/ P	n/a	n/a	n/a	T/ P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	n/a	n/a	L	n/a	n/a	n/a	L/ GL /W	L/ GL /W	L/ GL /W	n/a	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA										. ,						•	•		•			•		
Short Term	n/a	n/a	n/a		n/a				+	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	n/a	n/a	n/a		n/a				+	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	n/a	n/a	n/a		n/a				+	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	n/a	n/a	n/a		n/a				I/D	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	n/a	n/a	n/a		n/a				T/ P	n/a				T/ P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				L/ GL	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA																								
Short Term				+/?					+															
Medium Term				+/?					+															
Long Term				+/?					+															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/ P					T/ P															
Local / Greater London / Wider Region / Global				L					L/ GL															

#### **Objectives**

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- 2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- 3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- 4. To contribute to safety and security and the perceptions of safety
- 5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- 6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- 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 motorised transport
- 8. To maximise accessibility for all in and around London
- 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
- 10. 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
- 11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- 12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- 13. 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.
- 14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- 15. 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.
- 16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- 17. 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
- 18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- 19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- 20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- 21. 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.
- 22. To conserve London's geodiversity and protect soils from development and over intensive use.
- 23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- 24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

Chapter: Chapter 10 Transport	Policy: T8 Aviation

# a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

Clarifications were made throughout the policy text in Part B to distinguish between requirements that would apply to development plans and those that would apply to development proposals.

A clarification was made to T8 C to separate the more general principles relating to aviation growth (first sentence) from the HRA requirement for any airport expansion development proposal (second sentence).

T8 I was strengthened to stipulate that general and business aviation development proposals will only be supported if they do not lead to the previously outlined negative impacts (additional environmental harm, negative effects on health, or impacts on scheduled flight operations).

The supporting text was amended to:

- clarify the purpose of the policy with respect to aviation outside of London's boundaries,
- clarify that making better use of existing airport capacity should be the starting point for aviation-related development
- factually update the status of Stansted airport's approval to increase its flight cap,
- and strengthen the justification for refusing new heliports through T8 J.

#### 1.b Panel Recommendations

Some changes are proposed to the policy following the Panel's report. These include:

- The removal of part A of the policy to respond to the Panel's point that this was considered to be more of an objective alongside updates to paragraph 10.8.1 and 10.8.4 to reflect this.
- A clarification to part C of the policy in relation to its application to Development Proposals. A
  reference to "mitigation" has also been added to as a broad descriptor that covers all available
  approaches.
- A change to part E is proposed to clarify that this is specifically in relation to proposals that interact with London's transport system.
- An amendment to part G to clarify how it would be applied through development proposals.
- An amendment to part J of the policy and supporting text in relation to flights overflying London and how this is to be implemented.

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

• The clarification of T8 B and its application to development plans/area-based strategies may lead to such strategies better integrating spatial growth, public transport connections and airports. This is likely to result in a positive short (+), medium (+) and long (+) term impact, which is already reflected in the current scoring matrix. No change to the matrix.

#### Objective 9 Connectivity

• The change to part E of the policy clarifies that the focus is on mitigating the impacts of passenger movements through London that may arise from airport expansion proposals. Whilst this may result in a slight positive impact in relation to the capacity and connectivity of London's transport network, the current scoring of positive impacts in the medium and long term is considered to be appropriate. No change to matrix.

#### Objective 10 Economic competitiveness and employment

• The strengthening of the restriction on general and business aviation in T8 I may lead to tighter control of the growth of this sector. However, requirements for no additional environmental harm or negative effects on health... [or] impact on scheduled flight operations" remains unchanged. This may result in a slight negative impact on the objective, but when considered alongside the policy as a whole, which provides a supportive framework for the sustainable growth of aviation capacity, the current scoring of minor positive (+) in the short, medium and long term is considered to be appropriate. Whilst the deletion of part A of the policy could be considered to have a negative impact on the objective, the economic benefits of aviation are still recognised in the supporting text and part B of the policy still recognises the role of airports in enhancing the city's spatial growth subject to impacts being addressed. No change to the matrix

#### Objective 16 Climate change adaptation and mitigation

• The strengthening of T8 I may reduce the general and business aviation sector's contribution to carbon emissions. A slight change to part C also clarifies that proposals should include mitigation measures to meet their environmental costs could also help to reduce the impact of proposals on climate change. This is likely to have a minor positive impact in the short, medium and long term but when considering the policy as a whole, the impact is likely to remain neutral (O). No change to the matrix

#### Objective 20 Natural capital and natural environment

• The changes to T8 I may strengthen the protection of the natural environment. A slight change to part C also clarifies that proposals should include mitigation measures to meet their environmental costs. This is likely to have a minor positive impact (+) in the short, medium and long term, but when considering the policy as a whole, the impact is likely to remain neutral/slight negative impact (O/). No change to the matrix

#### Objective 24 Noise and vibration

• The strengthening of T8 I may help to prevent additional noise impacts from general and business aviation. This is likely to have a minor positive impact (+) in the short, medium and long term. In relation to part J, the movement of the text regarding helicopters overflying London to the supporting text is not considered to have an impact on the overall scoring given that this outcome is to be achieved through wider regime change, largely outside of planning. When considering the policy as a whole, the impact is likely to remain neutral (O) in the short and medium term, and neutral/minor positive (O/+) in the long term. No change to the matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

#### Objective 24 Noise and vibration

• As discussed under the SEA, the changes to T8 may contribute towards the prevention of negative health impacts resulting from additional noise from general and business aviation. As per the same objective under the SEA, this is likely to have a minor positive impact (+) in the short, medium and long term. In relation to part J, the movement of the text regarding helicopters overflying London to the supporting text is not considered to have an impact on the overall scoring given that this outcome is to be achieved through wider regime change, largely outside of planning. When considering the policy as a whole, the impact is likely to remain neutral (O) in the short and medium term, and neutral/minor positive (O/+) in the long term.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact

- 5. EqIA Equality Impact Assessment
- a. are the changes likely to have an impact on one or more protected characteristics?
- b. If yes, summarise the impact on the protected characteristic(s).

Objective 24 Noise and vibration

The strengthened tone of Policy T8 I, as described above, may make it more likely that development proposals for general and business aviation that would lead additional noise impacts are refused. This is likely to have a minor positive impact (+) in the short, medium and long term on those who could be more sensitive to noise, such as older Londoners<sup>1</sup> and children. In relation to part J, the movement of the text regarding helicopters overflying London to the supporting text is not considered to have an impact on the overall scoring given that this outcome is to be achieved through wider regime change, largely outside of planning. When this impact is considered alongside the policy as a whole, this would not result in a change to scoring matrix, and the impact would remain neutral (O) in the short and medium term and neutral/minor positive (O/+) in the long term.

<sup>&</sup>lt;sup>1</sup> An Age Friendly City: How far has London come? Kings College London, 2016

<b>Chapter:</b> Chapter 10 Transport	<b>Policy:</b> T9 Funding transport infrastructure through planning					
1. Initial assessment:						
a. brief summary of extent of changes an the policy	d whether the change is already reflected somewhere in					
Minor factual updates and clarifications to the have no material impact on the policy.	e supporting text were made relating to MCIL2. These changes					
2. SEA (Strategic Environmental Assessr	ment)					
2a. are the changes likely to have an impa	act on any of the objectives with SEA guide questions?					
No Impact						
3. HIA (Health Impact Assessment)						
3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?						
No Impact						
4. CSIA (Community Safety Impact Asses	ssment)					
4a. are the changes likely to have an impa	act on any of the objectives with CSIA guide questions?					
No Impact						
5. EqIA - Equality Impact Assessment						
a. are the changes likely to have an impac	ct on one or more protected characteristics?					
b. If yes, summarise the impact on the p	rotected characteristic(s).					
No Impact						

# Chapter 11 Funding the Plan

Chapter: Chapter 11	<b>Policy:</b> DF1 Delivery of the Plan and Funding
	Opportunities

a. brief summary of extent of changes and whether the change is already reflected somewhere in the policy

#### **Further Suggested Changes**

- Inclusion of additional paragraph 11.1.43A which sets out responsibility and funding arrangements for flood risk.
- Deletion of first sentence of green infrastructure section no material change

#### **Panel Recommendations**

- Inclusion of references to "where relevant policies in local Development Plan Documents are up to date" in Part A and B, and paragraph 11.1.5 no material change
- Clarification that the policies in the plan have been subject to viability study proportionate to a spatial development strategy – no material change
- Clarification that Local Development Documents should be informed by viability testing of local sites
   no material change

#### 2. SEA (Strategic Environmental Assessment)

#### 2a. are the changes likely to have an impact on any of the objectives with SEA guide questions?

Objective 15 Climate change adaptation and mitigation

 Inclusion of a new paragraph in relation to the responsibility and funding arrangements for identifying and managing flood risk is likely to contribution to protecting London from climate change impacts, helping London to function during a flooding event. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix.

#### Objective 19 Flood Risk

Inclusion of a new paragraph in relation to the responsibility and funding arrangements for
identifying and managing flood risk is likely to positively manage residual flood risk and avoid new
flood risk. This is likely to have positive impacts in the short, medium and longer term.

No change to the Matrix.

#### 3. HIA (Health Impact Assessment)

#### 3a. are the changes likely to have an impact on any of the objectives with HIA guide guestions?

No Impacts.

#### 4. CSIA (Community Safety Impact Assessment)

#### 4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impacts.

#### 5. EqIA - Equality Impact Assessment

a.	are the changes likely to have an impact on one or more protected characteristics?
No Imp	pacts.

b. If yes, summarise the impact on the protected characteristic(s).

Appendix 1: IIA Questions

## **Strategic Environmental Assessment**

Objective No	IIA Topic	IIA Objective	SEA Key Guide Questions
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	n/a
2	Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	n/a
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	n/a
4	Crime, safety and security	To contribute to safety and security and the perceptions of safety	n/a
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 household demand	n/a
6	Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	<ul> <li>Make the best use of land through appropriate development on brownfield sites and use of existing transport network?</li> <li>Integrate land use and transport?</li> </ul>
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	<ul> <li>Conserve and enhance the townscape/cityscape character?</li> <li>Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</li> <li>Encourage an inclusive design approach taking into account the needs of a variety of users?</li> <li>Help to improve the wider built environment and create a sense of place and 'vibrancy'?</li> <li>Promote high quality design and sustainable design and construction methods?</li> </ul>
8	Accessibility	To maximise accessibility for all in and around London	n/a
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	<ul> <li>Improve connectivity by public transport in outer London?</li> <li>Improve connectivity across the River Thames by all modes of transport, particularly in east London?</li> <li>Reduce traffic volumes and congestion on roads across all parts of London?</li> <li>Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> </ul>

Objective No	IIA Topic	IIA Objective	SEA Key Guide Questions
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	<ul> <li>Help maintain London as an internationally competitive city?</li> <li>Increase London's productivity?</li> <li>Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive?</li> <li>Help generate satisfying, secure and rewarding new jobs?</li> <li>Help reduce overall unemployment, particularly long-term and youth unemployment?</li> <li>Improve the resilience of business and the economy?</li> <li>Help to diversify the economy?</li> <li>Encourage business start-ups and support the growth of businesses, particularly SMEs?</li> <li>Support social enterprise, voluntary and community sectors?</li> <li>Support small, local retail offers?</li> </ul>
11	Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	<ul> <li>Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery?</li> <li>Unlock land that has capacity for housing development?</li> </ul>
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	<ul> <li>Support London's status as an international city of learning, research and development?</li> <li>Encourage education and training that meets the needs of business, including vocational training?</li> </ul>
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	<ul> <li>Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector Provide access to affordable cultural activities in areas of deprivation</li> <li>Enable Londoners to develop skill and take up careers in the creative industries</li> </ul>
14	Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	<ul> <li>Reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions?</li> <li>Help to achieve national and international standards for air quality?</li> <li>Reduce costs to the economy resulting from premature deaths due to poor air quality?</li> </ul>
15	Climate change adaptation and mitigation	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	<ul> <li>Protect London from climate change impacts?</li> <li>Help London to function during a flood event or heavy rainfall?</li> <li>Help London to function during periods of drought</li> </ul>

Objective No	IIA Topic	IIA Objective	SEA Key Guide Questions
16	Climate change adaptation and mitigation	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	<ul> <li>Help London meet its emission targets?</li> <li>Reduce transport's contribution to CO<sub>2</sub> emissions?</li> <li>Reduce the built environment's contribution to CO<sub>2</sub> emissions?</li> <li>Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions?</li> <li>Promote the transition to a low carbon economy?</li> <li>Reduce carbon emissions by shifting to more sustainable modes of transport?</li> </ul>
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	<ul> <li>Increase the proportion of energy both purchased and generated from renewable and sustainable resources?</li> <li>Reduce the demand and need for energy?</li> <li>Promote generation of energy locally?</li> <li>Ensure that any supply shortages are addressed?</li> <li>Promote and improve energy efficiency?</li> <li>Promote the transition to a low carbon economy?</li> </ul>
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 system	<ul> <li>Reduce discharges to surface and ground waters?</li> <li>Support necessary improvements to the water systems infrastructure (water supply/ sewerage)?</li> <li>Reduce abstraction from surface and ground water sources?</li> <li>Reduce water consumption through the promotion of demand management?</li> <li>Protect and enhance the character and use of London's riverscapes and waterways?</li> </ul>
19	Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	<ul> <li>Manage residual flood risks appropriately and avoid new flood risks?</li> <li>Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?</li> <li>Promote sustainable urban drainage?</li> </ul>
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	<ul> <li>Protect and enhance the character of local greenscapes?</li> <li>Help to acknowledge monetary value to natural capital of London</li> <li>Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network?</li> <li>Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance?</li> <li>Promote and support the function of the Blue Ribbon Network?</li> </ul>
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.	<ul> <li>Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>Contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>Improve the quality and condition of the historic environment?</li> <li>Respect, maintain and strengthen local character and distinctiveness?</li> </ul>
22	Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	<ul> <li>Promote the use of brownfield land?</li> <li>Prevent further soil degradation or erosion?</li> <li>Restore degraded soil?</li> <li>Maximise the potential benefit of access to new employment and housing as a result of remediation?</li> </ul>

Objective No	IIA Topic	IIA Objective	SEA Key Guide Questions
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 reuse and recycling rates	<ul> <li>Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?</li> <li>Maximise use of innovative waste management techniques including smart technology?</li> <li>Help develop more efficient and sustainable freight transportation?</li> </ul>
24	Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	Help reduce actual noise levels and disturbances from noise?

## **Equality Impact Assessment**

Objective No	IIA Topic	IIA Objective	EqIA Key Guide Questions
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	<ul> <li>(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;</li> <li>(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;</li> <li>(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it</li> <li>Reduce poverty and social exclusion?</li> <li>Promote a culture of equality, fairness and respect for people and the environment?</li> <li>Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?</li> <li>Provide opportunities for Londoners to actively participate in the city's life, decision making and communities?</li> <li>Provide opportunities for Londoners of every background to connect?</li> </ul>
2	Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	As above
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	<ul> <li>Reduce differentials in life expectancy and healthy life expectancy across London?</li> <li>Reduce inequalities in physical and mental health and wellbeing?</li> </ul>
4	Crime, safety and security	To contribute to safety and security and the perceptions of safety	Create a travel environment that feels safe to all users during the day time and night time?
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 household demand	<ul> <li>Help to facilitate the delivery of house building that meets the needs of Londoners?</li> <li>Increase the range and affordability of housing?</li> <li>Promote accessible and adaptable homes, improving choice for people who require them?</li> <li>Provide housing that encourages a sense of community and enhances the amenity value of the community?</li> </ul>
6	Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	<ul> <li>Ensure that higher densities development does not adversely impact on different groups of people?</li> <li>Promote regeneration and provide benefits for existing communities?</li> </ul>

Objective No	IIA Topic	IIA Objective	EqIA Key Guide Questions
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	<ul> <li>Help to make people feel positive about the area they live in and promote social integration?</li> <li>Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments?</li> <li>Retain the spatial diversity of communities?</li> </ul>
8	Accessibility	To maximise accessibility for all in and around London	<ul> <li>Improve accessibility to all public transport modes?</li> <li>Increase equality of access to services and facilities?</li> <li>Improve links between areas, neighbourhoods and communities?</li> </ul>
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	<ul> <li>Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)?</li> <li>Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> </ul>
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	<ul> <li>Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration?</li> <li>Enable people with physical and mental health conditions and disabilities to stay in employment?</li> <li>Support working families?</li> <li>Minimise barriers to employment (eg transport, financial, childcare)</li> </ul>
11	Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	<ul> <li>Provide accessible infrastructure to connect new housing developments to key services?</li> <li>Ensure equity of access to environmental, social and physical infrastructure</li> </ul>
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	<ul> <li>Help to improve learning and the attainment of skills to the right employment opportunities?</li> <li>Ensure provision of sufficient school places to meet growing needs across London?</li> <li>Support transitions from education to work?</li> <li>Support adult education to improve social mobility and life chances for all ages?</li> <li>Support early year's education and support, particularly in areas of deprivation?</li> </ul>
13	Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure,	Improve accessibility for all to cultural venues

Objective No	IIA Topic	IIA Objective	EqIA Key Guide Questions
		heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	<ul> <li>Improve participation by all in cultural activities and support cultural activities that promote social integration?</li> <li>Provide access to affordable cultural activities in areas of deprivation?</li> </ul>
14	Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	Reduce inequalities in terms of access to clean air across London, particularly for those:  • who live in deprived areas?  • who live, learn or work near busy roads or construction sites?  • who are more vulnerable?
15	Climate change adaptation and mitigation	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	Reduce impacts on groups more vulnerable to the effects of climate change (e.g. older people are more vulnerable to excess heat?)
16	Climate change adaptation and mitigation	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	n/a
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	Contribute to the provision of smart and affordable energy system?
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 system	Protect and enhance the character and use of London's rivers capes and waterways?
19	Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	Minimise the risk of flooding from all sources of flooding to people, property, infrastructure
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	<ul> <li>Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all?</li> <li>Create green spaces that are safe and accessible to all?</li> <li>Promote sensory environments and play spaces?</li> </ul>
21	Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of	<ul> <li>Engage communities in identifying culturally key features and areas?</li> <li>Provide for increased access of and enjoyment of the historic environment?</li> <li>Provide for increased understanding and interpretation of the historic environment?</li> </ul>

Objective No	IIA Topic	IIA Objective	EqIA Key Guide Questions
		historical, architectural, archaeological and cultural value in relation to their significance and their settings.	
22	Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	• n/a
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 reuse and recycling rates	Minimise negative impacts of waste processing and disposal on vulnerable groups?
24	Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	Minimise and reduce road, rail and aviation noise and vibration levels and disruption?

## **Health Impact Assessment**

Objective No	IIA Topic	IIA Objective	HIA Key Guide Questions
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	Provide opportunities for people to choose an active, fulfilling life?
2	Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	As above
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	<ul> <li>Improve access and equity of access to health and social care services and facilities?</li> <li>Promote increases in physical activity, particularly in areas of health and social deprivation?</li> <li>Reduce inequalities in levels of physical activity?</li> <li>Improve the physical and mental health and wellbeing of communities?</li> <li>Support the provision of quality, affordable and healthy food?</li> </ul>
4	Crime, safety and security	To contribute to safety and security and the perceptions of safety	n/a
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 household demand	<ul> <li>Reduce homelessness and overcrowding?</li> <li>Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health?</li> </ul>
6	Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	n/a
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	n/a
8	Accessibility	To maximise accessibility for all in and around London	n/a?
9	Connectivity	To enhance and improve connectivity for all to, from, within and around London and increase the proportion of	Reduce congestion on public pavements and footpaths, especially in central London?

## **Community Safety Impact Assessment**

Objective No	IIA Topic	IIA Objective	CSIA Key Guide Questions
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	n/a
2	Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	n/a
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	n/a
4	Crime, safety and security	To contribute to safety and security and the perceptions of safety	<ul> <li>Reduce levels of crime?</li> <li>Reduce the opportunity for crime and antisocial behaviour?</li> <li>Increase security and resilience to major incidents?</li> <li>Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?</li> </ul>
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 household demand	n/a
6	Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	n/a
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	n/a
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	Encourage active travel by creating safe, attractive routes?

Objective No	IIA Topic	IIA Objective	CSIA Key Guide Questions
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	n/a
11	Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	n/a
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	n/a
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	n/a
14	Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	n/a
15	Climate change adaptation and mitigation	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	n/a
16	Climate change adaptation and mitigation	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	n/a
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	n/a

Objective	IIA Topic	IIA Objective	CSIA Key Guide Questions
No			
		resilient smart and affordable energy system	
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 system	n/a
19	Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	n/a
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	n/a
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.	n/a
22	Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	n/a
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 reuse and recycling rates	n/a
24	Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	n/a

Objective No	IIA Topic	IIA Objective	HIA Key Guide Questions
		journeys made by sustainable and active transport modes	
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	Create healthy, productive workplaces?
11	Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	n/a
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	n/a
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	n/a
14	Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	<ul> <li>Reduce the number of people exposed to particulates and NO2 concentrations, particularly vulnerable people?</li> <li>Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals?</li> </ul>
15	Climate change adaptation and mitigation	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	Improve the micro-climate and ameliorate the impact of the heat island effect on Londoners?
16	Climate change adaptation and mitigation	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	n/a
17	Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing	Reduce impacts of fuel poverty, particularly for vulnerable groups?

Objective No	IIA Topic	IIA Objective	HIA Key Guide Questions
		energy sources effectively, and ensure a resilient smart and affordable energy system	
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 system	Improve the quality of water bodies helping to meet the objectives of the Water Framework Directive?
19	Flood risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	n/a
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	<ul> <li>Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?</li> <li>Specifically address deficiencies in access to open space?</li> </ul>
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.	Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?
22	Geology and soils	To conserve London's geodiversity and protect soils from development and over intensive use	Minimise the risk of health impacts through contamination?
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 reuse and recycling rates	n/a
24	Noise and vibration	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	<ul> <li>Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects?</li> <li>Improve people's access to quiet/ tranquil spaces?</li> <li>Reduce night time noise in residential areas?</li> </ul>