

Integrated Impact Assessment Report

Minor Alterations to the London Plan
(Spatial Development Strategy for Greater London)

Housing Standards
(Energy and Carbon, Water Efficiency,
Residential Space Standards and Accessibility)



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Non-Technical Summary

This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) Report which documents the assessment of the environmental, social and economic performance of the proposed Housing Standards Minor Alterations to the London Plan (MALP) against a set of sustainability objectives. This IIA is being published alongside the proposed Housing Standards MALP and the Mayor's Policy Statement on the Housing Standards.

The following sections provide an outline of the content of the proposed Housing Standards MALP and the methodology used to assess them. For details on how to give your views, please see section 1.3.1 (page 3) in the main report.

1. What are the Housing Standards Minor Alterations to the London Plan?

The London Plan is the Mayor's spatial development strategy which is required under the Greater London Authority Act 1999 (as amended). The London Plan deals with matters of strategic importance to Greater London. Local Development Frameworks (LDFs) produced by the London boroughs are required to be, 'in general conformity' with it.

The London Plan is required to be kept under review and to be in conformity with national policy. Following recent government reviews of national housing standards^{1 2} and the publication of its Written Statement to Parliament on the Housing Standards³, the Mayor is bringing forward the proposed Housing Standards MALP to ensure the London Plan is in conformity with these national standards. The Greater London Authority (GLA) has employed AMEC to undertake an Integrated Impact Assessment (IIA) of these minor alterations.

The alterations do not comprise a full review of the London Plan 2011 (as amended), so that not all policy areas will be altered. The proposed Housing Standards MALP will broadly address:

- Energy and Carbon dioxide;
- Water efficiency in residential development;
- Residential space standards; and
- Accessibility in residential development.

The London Plan, as amended in 2015 is being updated in response to the government's Written Statement to Parliament on the National Housing Standards.

¹ Housing Standards Review Consultation, August 2013, Department for Communities and Local Government.

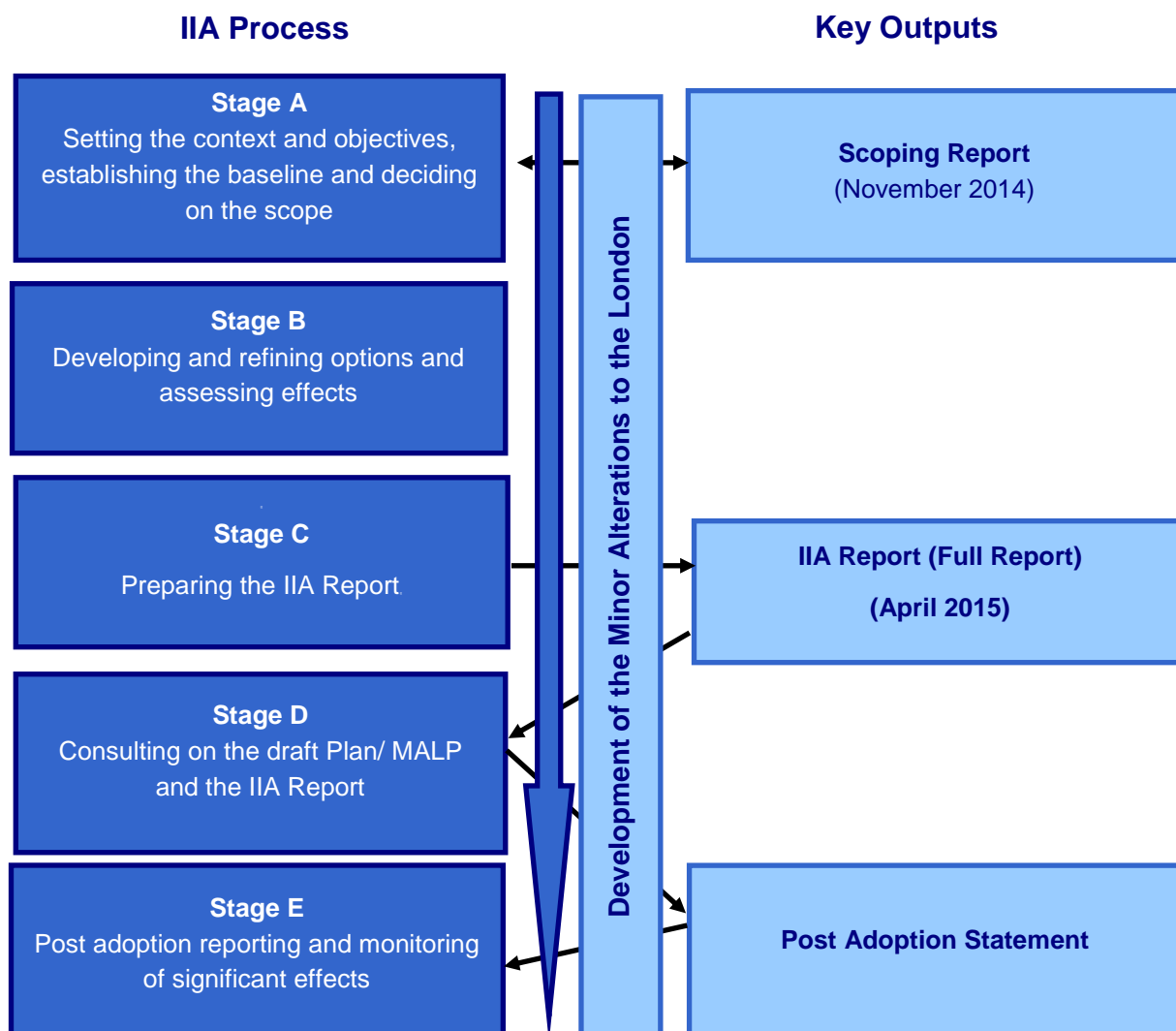
² Housing Standards Review Detailed Implementation Consultation, September 2014, Department for Communities and Local Government.

³ Eric Pickles Written Statement to Parliament 25th March 2015

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

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

The diagram below shows an overview of the key stages of the IIA process (which are based on Government planning practice guidance (DCLG, 2014). The IIA Scoping Report (that reflected the completion of Stage A) was subject to consultation with the statutory SEA consultees and other stakeholders in November 2014. Responses to the Scoping Report have been reflected in this IIA Report. The consultation on this IIA Report is indicated as Stage D in the diagram in Figure 1 and follows the iterative assessment of effects and the preparation of this report.



3. How were the proposed Housing Standards Minor Alterations to the London Plan Assessed?

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

Figure 1: Diagram showing the five main stages of this IIA process

IIA Objectives	
1. Regeneration & Land-Use.	To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.
2. Biodiversity.	To protect, enhance and promote the natural biodiversity of London.
3. Health and Well-being.	To maximise the health and well-being of the population and reduce inequalities in health.
4. Equalities.	To advance the equality of opportunity for all communities and especially between people who share a protected characteristic and those that do not have that characteristic in order to minimise, discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.
5. Housing.	To ensure that all Londoners have access to good quality, well-located housing that is affordable.
6. Employment.	To offer everyone the opportunity for rewarding, well-located and satisfying employment.
7. Stable Economy.	To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.
8. Flood Risk and Climate Change Adaptation.	To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.
9. Climate Change Mitigation and Energy.	To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.
10. Water Quality & Water Resources.	To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.
11. Waste.	To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.
12. Accessibility and Mobility.	To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).
13. Built and Historic Environment.	To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.
14. Liveability and Place.	To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.
15. Open Space.	To protect and enhance natural open space in London.
16. Air Quality.	To improve London's air quality.

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

4. What strategic options were considered?

There are a number of proposed policy alterations that are very similar and can therefore be grouped together. In this way, the assessment can consider similar policy revisions together, for example in minimising carbon dioxide emissions from development.

Each of these similar policy groups may involve several amendments throughout the London Plan, both to policies and supporting text. For example minimising carbon dioxide emissions from development involves revisions to Policies 5.2, and numerous supporting paragraphs.

There are four of these policy groupings and they are listed below:

Energy and Carbon Dioxide	Water Efficiency
Residential Accessibility	Residential Space Standards

For most of these proposed policies, alternatives are limited since the Government is setting a single ‘optional’ standard, beyond the Building Regulation minimum for each housing element throughout England and Wales. Even where a local authority already has an equivalent adopted housing standard, the national housing standard must be republished by a local planning authority within six months (30th September 2015) of the Written Statement to Parliament on the Housing Standards Review to enable its continued implementation. Therefore, the alternatives only include:

- **Do not** update the London Plan; and
- **Include** the policy alteration (as per the ‘optional’ standards set out by the Government).

5. What are the likely effects of the proposed Minor Alterations?

A commentary has been provided on the sustainability effects of the proposed Housing Standards Minor Alterations to the London Plan. This assessment of the likely effects of the proposed Minor Alterations has focused on the areas of Energy and Carbon dioxide, Water efficiency, Residential Space Standards and Accessibility. It has shown that the effects of the proposed Housing Standards MALP on these areas are generally positive, especially on the environmental and social objections. However, in reality it will appear that housing will continue to be designed as it currently is. The proposed Housing Standards MALP will ensure clarity on this policy matter across London and will ensure these standards apply across London, without each individual London borough having to produce its own need and viability study. This will result in a financial benefit for developers and London boroughs.

6. How will any likely effects of the alterations be monitored?

The effects of the proposed Housing Standards MALP will be monitored by the Annual Monitoring report (AMR), published each March. The energy policies will also be monitored through the Monitoring the implementation of London Plan energy policies report, which is published annually. Further statistics are produced by the Government, including the English Housing Survey which can be used for monitoring the outcomes of the proposed Housing Standards MALP.

7. What are the next steps?

This IIA Report is issued for consultation alongside the draft Housing Standards MALP. Consultation will last for 6 weeks from **11th May 2015** to **22nd June 2015**. Following receipt of comments on the draft Housing Standards MALP and the IIA Report, an Examination in Public (EIP) will be carried out in September 2015. If required, the EIP Inspector will make recommendations to the Mayor. Following consideration of these recommendations, the Mayor will inform the Secretary of State for Communities and Local Government that he intends to publish the new Housing Standards MALP. Following approval from the Secretary of State, the Mayor will submit the ‘intend to publish’ MALP to the London Assembly for their consideration. The Assembly then has 21 days within which it can reject the alterations by a two thirds majority if it so wishes.

8. How do I provide comments on the IIA?

All responses on the draft MALP and/or the IIA Report must be received by **5pm** on **22nd June 2015**. Details of how to respond are identified in **Section 1.1.3** (page 3).

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1. Introduction

1.1 Integrated Impact Assessment

AMEC Environment and Infrastructure UK has been appointed to undertake the Integrated Impact Assessment (IIA) of the proposed Housing Standards Minor Alterations to the London Plan (MALP) by the GLA. The Mayor is responsible for keeping the London Plan, which provides the statutory planning framework to guide London's future development under review. The latest London Plan was published in 2011 with alterations published in October 2013 and March 2015. These changes are known as the Revised Early Minor Alterations (REMA) to the London Plan and the Further Alterations to the London Plan (FALP), respectively. This IIA covers the proposed Housing Standards MALP which generally address the Government's Housing Standards Review, and arise from a commitment made to the Government during the publication of FALP. There are also proposed changes the energy policy (5.2) in anticipation of the introduction of 'zero carbon' housing and Allowable Solutions.

This IIA Report presents an assessment of the environmental, social and economic performance of the proposed Housing Standards MALP against a set of sustainability objectives. This report follows consultation on a Scoping Report (GLA, 2014)⁴ which sets out the proposed approach to the IIA.

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

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

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

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

⁴ Greater London Authority (2014) Integrated Impact Assessment (IIA) of the Minor Alterations to the London Plan (MALP): A Scoping Request.

Authorities are required to assess the effects of land use plans on European site of nature conservation to determine whether there will be any ‘likely significant effects’ on these sites as a result of the plan’s implementation or in combination with other plans and projects. In this instance as the proposed alterations are limited in scope and not site specific, a full HRA is not required.

1.2 Purpose of Report

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

- | | |
|-------------------|--|
| Section 1 | Introduction; Provides an introduction to the IIA and consultation arrangements and an overview of the policy alterations. |
| Section 2 | Overview of the proposed Minor Alterations to the London Plan; The context of the IIA, including an overview of the proposed MALP. |
| Section 3 | Methodology; Presents the baseline evidence relevant to the alterations (including the review of plans and programmes) and the objectives used in the IIA. It also provides information on the assessments’ assumptions and the separate requirement for a Habitats Regulations Assessment. |
| Section 4 | Assessment of proposed alterations: Energy and Climate Change; Presents the assessment of policy alterations affecting Energy, carbon dioxide emissions and Climate Change mitigation. |
| Section 5 | Assessment of proposed alterations: Water efficiency; Presents the assessment of policy alterations affecting Water efficiency. |
| Section 6 | Assessment of proposed alterations: Residential Space Standards; Presents the assessment of policy alterations affecting Residential Space Standards. |
| Section 7 | Assessment of proposed alterations: Accessibility; Presents the assessment of policy alterations affecting Accessibility. |
| Section 10 | Summary of findings; Presents a summary of effects on all six themes for comparisons and identification of cross cutting issues. |
| Section 11 | Conclusions and Recommendations; Presents the key findings of the assessment and a proposed framework for monitoring any significant effects. |

1.3 Consultation and Stakeholder Engagement

Consultation and stakeholder engagement are fundamental to the IIA process and reflects the principle that the development of plans is better where it is transparent, inclusive and uses information that has been subject to public scrutiny. The IIA process aims to ensure that the key stakeholders, those parties who could be affected and the wider public have the opportunity to present their views on the findings of the assessment.

1.3.1 How to give your views on this IIA

This IIA Report is being issued for public consultation alongside the draft Housing Standards MALP. In addition to seeking views from statutory consultees, this IIA Report is available to all organisations / individuals that have an interest in the proposed Housing Standards MALP and responses are welcome. The consultation period will run from the **11th May 2015** to **22nd June 2015**.

You can view this document online and download it from www.london.gov.uk.

All responses on the draft MALP and/or the IIA report must be received by **5pm on Friday 22nd June 2015** and should be sent:

By email to mayor@london.gov.uk with 'London Plan – Housing Standards MALP' in the email title.

By post (no stamp required) to:

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

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

2. Overview of the Minor Alterations to the London Plan

2.1 Introduction

This section provides an overview of the proposed Housing Standards MALP. It highlights the need for alterations to the existing London Plan (**Section 2.2**) and an overview of the proposed MALP (**section 2.3**).

It should be noted that the Mayor is also carrying a separate Minor Alteration to the London Plan on residential parking standards in Outer London. This MALP (Parking) is subject to its own process and therefore a separate IIA has been prepared.

2.2 The need for proposed MALP

In August 2013 the UK Government consulted on its intention to introduce national housing standards to replace the large number of existing standards used by local authorities across the UK. The aim was to reduce the administrative burden on new housing developments by simplifying and rationalising the large number of standards that local authorities can apply to new homes. The intention of the new standards is to reduce or eliminate unnecessary delays, reduce administrative process costs and reduce uncertainty associated with local standards, leading to greater efficiencies and clarity on what is required.

In September 2014, the Government launched a further consultation on the technical material related to the review, including more details on the standards and how the transitional arrangements are intended to work. The consultation documentation is available at: www.gov.uk/government/consultations/housing-standards-review-technical-consultation. The consultation closed on the 7th November 2014 and included an Impact Assessment prepared by the Department for Communities and Local Government (DCLG).⁵

As part of the Housing Standards Review, through the Deregulation Act 2015, the amendments to the Building Act 1984 have been introduced to enable Building Regulations to set ‘optional requirements’ in relation to wheelchair access, accessibility and water efficiency above the basic minimum set out in the existing Building Regulations. These changes enable the new housing standards to be enforced through building regulations, with the optional requirements secured through a condition to a planning permission.

In addition to the optional requirements introduced through the Building Regulations the government has introduced uniform nationally prescribed residential space standards for new housing. This is to be administered

⁵ Housing Standards Review: Detailed Implementation Consultation, Impact Assessment, DCLG, September 2014.

through the planning system. Where local authorities already have similar standards the Building Regulation ‘optional requirements’ and the nationally prescribed space standards must adopted by 1st October 2015. Where the standards are not in a Local Plan, they must be adopted through the plan making processes, and when a plan is reviewed they should be included as part of that review.

The proposed MALP also include updates and changes to energy policy 5.2 following the introduction of Part L 2013 Building Regulations, updates of evidence and in anticipation of the introduction of ‘zero carbon’ housing and Allowable Solutions.

The Government Housing Standards Review consultation also addressed security and external waste storage. These policies are to be introduced through the mandatory element of the Building Regulations and therefore do not require planning policy to support them. There are no existing specific policies in the published London Plan that address these issues. As these elements are not a matter of planning policy they have been scoped out of this full IIA report.

The Government published its Written Statement to Parliament on 25th March 2015⁶. The Deregulation Act 2015 also received Royal Assent in late March 2015. At the same time amendments were introduced to the Building Regulations setting out the optional standards. The transitional arrangements state up to 30th September 2015, planning authorities should not seek standards regarding access, internal space and water efficiency apart from those already in a planning policy document. From 1st October 2015 only standards adopted in a local plan can be secured, and these are to be in line with the governments housing standards.

With regards to energy, local planning authorities should not seek standards beyond Code Level 4 equivalent (approximately 19% improvement beyond Part L 2013 Building Regulations) where this is in line with an existing policy.

The London Plan already contains policies seeking minimum space standards, lifetime homes standards, 10% wheelchair housing, water efficiency and energy efficiency measures. However, in line with Government policy a review of the need and viability of these policies has been carried out in order to adopt the national housing standards. These reports have informed the appraisal of the policies and will be published alongside the proposed Housing Standards MALP.

The Greater London Authority (GLA) Act 1999 (as amended) requires the Mayor to produce a Spatial Development Strategy (which is generally known as the London Plan) and to keep it under review. The London Plan has to be reviewed to reflect the Government’s new housing standards. Formal Minor Alterations to the London Plan (MALP) are required to address revisions required by the Government’s review. In line with national and European requirements, the Mayor will undertake an Integrated Impact Assessment (IIA) of these alterations.

⁶ <https://www.gov.uk/government/speeches/planning-update-march-2015>

2.3 Overview of the draft Housing Standards MALP

The new standards will be implemented and enforced, in part through amendments to the Building Regulations. The London Plan needs to be consistent with the new national standards and a number of policies will need minor alterations as a result. The alterations do not comprise a full review of the London Plan, so that not all policy areas will be altered. The proposed Housing Standards MALP broadly address the effects on:

1. Energy and Carbon dioxide;
2. Water efficiency;
3. Residential Space Standards; and
4. Accessibility.

The adoption of the national housing standards through the London Plan will result in the standards also becoming policy in borough Local Plans.

2.3.1 Evidence Base and Iterations.

A large proportion of existing baseline evidence used previously for the FALP has not changed in the short period between the FALP review and this draft Housing Standards MALP review. Therefore, the majority of existing baseline evidence from the previous FALP assessment has been used for this proposed MALP. Documents and information have been updated where new versions have been created since the FALP assessment, and some new supporting evidence sources have been found as well.

3. Methodology

3.1 Introduction

This IIA Report provides an assessment of the proposed Housing Standards MALP and its alternatives. The approach adopted in this IIA Report is in accordance with the requirements of SEA and has been expanded to include a wider range of issues normally found within a SA, as well as those relevant to Health Impact Assessment, Equalities Impact Assessment, and Community Safety Impact Assessment. The approach is based on the five main stages of SA and is outlined in Figure 3.1.

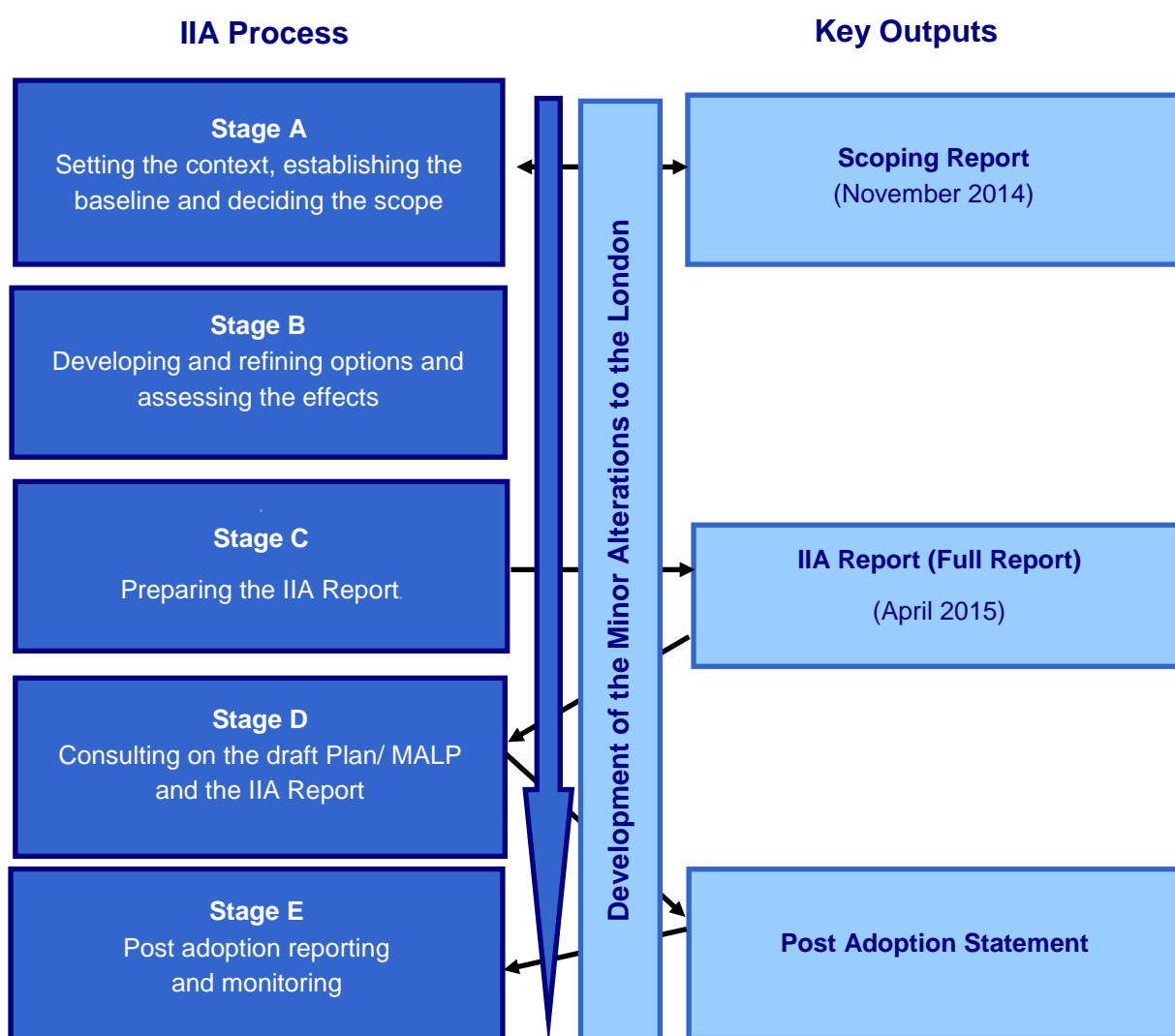


Figure 3.1: Diagram showing the five main stages of this IIA process

This section sets out the methodology, including the scope of the assessment (3.2), the method for collecting and presenting baseline (3.3), the objectives and issues (3.3.3) and assumptions and technical difficulties (3.6).

3.1.1 Links with previous IIAs

For consistency, the approach taken in this IIA Report is consistent with the full IIA Report (April 2014) on the FALP. This approach builds on the previous assessments undertaken for the London Plan 2011 and the REMA published in October 2013. For example, the key sustainability issues and the IIA objectives set out in these previous assessments have been the starting point for scoping the framework for the IIA of the proposed Housing Standards MALP and updated where necessary.

3.2 Scope of the Assessment

3.2.1 Thematic and Geographic Scope

The thematic topics which have been scoped in to this IIA Report have been informed by the topics identified in Annex I of the SEA Directive. In general the assessment includes any areas affected by the policy alterations within Greater London and, if appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions, and the wider UK.

The key geographic areas within the Greater London boundary are defined by the individual London boroughs (depicted within the Figure 3.2).

The proposed Housing Standards MALP will apply across London. The largest impact will be on areas where housing is delivered.



Figure 3.2: A Map of the Greater London Boroughs

3.2.2 Temporal Scope

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

- **Short term:** This may be taken to refer to the effects that occur within the first five years of the implementation of the Housing Standards MALP;

- **Medium term:** This may be taken to refer to the effects occurring between five and 15 years following adoption of the Housing Standards MALP; and
- **Long term:** This may be taken to refer to the effects occurring beyond 15 years and which may arise beyond the Plan's specified lifetime (post 2036).

However, in accordance with the GLA Act 1999 (as amended), the London Plan is reviewed regularly and therefore any temporal effects will be regularly reviewed. The energy policy has a temporal element in it, with the standards becoming more stringent in 2016 and for non-residential development, again in 2019.

3.3 Baseline

3.3.1 Review of Plans, Programmes and Strategies

The SEA Directive requires a review of the plan's "*relationship with other relevant plans and programmes*". Relevant documents to the London Plan were identified and reviewed as part of this full IIA Report. Additional plans and programmes considered specifically relevant to these policy alterations are listed in sections 4 to 10 regarding Energy and Carbon dioxide, Water efficiency, Housing Space Standards and Accessibility, respectively.

3.3.2 Baseline Information

An essential part of the IIA process is to identify the current baseline environmental, economic and social conditions and where possible the likely evolution of these conditions following a 'business as usual' scenario (i.e. one in which there is no review or replacement of the London Plan). It is only with sufficient knowledge of the existing conditions that the key issues may be identified and addressed through the assessment process by providing the context for determining the contribution that the plan may make towards the achievement of the objectives. As detailed under section 2.3.1, existing baseline evidence from the previous FALP assessment has been updated for this proposed Housing Standards MALP.

3.3.3 Sustainability Objectives for the IIA

The establishment of appropriate objectives and indicative guide questions is central to the assessment process and provides a way in which the performance and effects of the proposed Housing Standards MALP can be identified and described. Using objectives ensures that each topic area required by the SEA regulations is addressed and provides a framework which guides the assessment in a consistent manner enabling the likely effects of the implementation of the Housing Standards MALP to be identified. Using this approach will ensure consistency with the previous IIAs of the London Plan 2011 and its alterations.

This objective-led approach enables the appraisal to identify the extent that the proposed Minor Alterations contribute towards each objective, rather than if they will meet prescribed targets. It is therefore more qualitative

and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more restrictive at a strategic level.

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

The indicative guide questions have been formulated to provide additional guidance on aspects that could be considered with regards to the likely effects that may occur. They are not designed to be read as targets or aims with which to achieve the objective. Furthermore, a general assumption that underpins the sustainability objectives is that all existing legal requirements will be met and, as such, statutory compliance has not been reflected individually within the objectives or within the guide questions. The objectives and guide questions are listed in Table 3.1. The scoring system used in the IIA is shown in Table 3.2.

Table 3.1 Sustainability Objectives and Guide Questions for the IIA

Sustainability Objectives	Guide Questions for the IIA	SEA Topic Requirement
1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.	<ul style="list-style-type: none"> Will the regeneration have benefits for deprived areas? Will it help to make people feel positive about the area they live in? Will it help to create a sense of place and 'vibrancy'? Will it help reduce the number of vacant and derelict buildings? Will it make the best use of scarce land resources and reuse brownfield sites? Will it minimise impacts of development on the environment? Will it help address contamination, including of land? 	Material Assets
2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.	<ul style="list-style-type: none"> Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)? Will it improve the quality and extent of designated and non-designated sites? Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? Will it protect and enhance the region's waterbodies to achieve a good ecological status? Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment? Will it bring nature closer to people, especially in the most urbanised parts of the city? Will it promote respect and responsibility for the wise management of biodiversity? Will it improve access to areas of biodiversity interest? Will it enhance the ecological function and carrying capacity of the green space network? Will it promote a network of green infrastructure? 	Biodiversity, Fauna, Flora, Soil, Water, Landscape

3. Health and Well-being. To maximise the health and well-being of the population and reduce inequalities in health.	<ul style="list-style-type: none"> • Will it help reduce poverty and the impact of income inequality? • Will it help reduce health inequalities? • Will it help improve mental and emotional health? • Will it improve access to high quality public services (including health facilities)? • Will it help reduce the misuse of substances? • Will it help people to live an inclusive and active lifestyle? • Will it promote a sense of well-being? 	Population, Human Health
4. Equalities. To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas and communities most affected? • Will it remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination? • Will it, in particular address the housing, cultural, social and employment needs of those with protected characteristics? • Will it reduce the level of crime experienced by those with protected characteristics? • Will it promote adequate accessibility, in particular for older or disabled people? 	Population, Human Health
5. Housing. To ensure that all Londoners have access to good quality, well-located housing that is affordable.	<ul style="list-style-type: none"> • Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate social and environmental infrastructure are in place for new residents? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it increase use of sustainable design and construction principles? • Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? • Will it ensure homes are well located in relation to flood risk? • Will it promote the increased supply of housing? 	Population, Human Health, Material Assets
6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	<ul style="list-style-type: none"> • Will it help generate satisfying and rewarding new jobs? • Will it help to provide employment in the most deprived areas and stimulate regeneration? • Will it help reduce overall unemployment, particularly long-term unemployment? • Will it help to improve learning and the attainment of skills? • Will it encourage the development of healthy workplaces? 	Population, Material Assets
	Will it provide employment in accessible locations?	

<p>7. Stable Economy. To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.</p>	<ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it help to diversify the economy? • Will it prevent the loss of local businesses? • Will it encourage business start-ups and support the growth of businesses? • Will it encourage ethical and responsible investment? • Will it help reduce levels of deprivation? • Will it support the development of green industries and a low carbon economy? • Will it support other niche or emerging sectors of the economy? • Will it help maintain London as an internationally competitive city? • Will it support the infrastructure required by a growing and changing economy? 	<p>Population, Material Assets,</p>
<p>8. Flood Risk and Climate Change Adaptation. To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.</p>	<ul style="list-style-type: none"> • Will it protect London from climate change impacts? • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it manage existing flood risks appropriately, including taking opportunities to reduce existing flood risk and avoid new flood risks? • Will it minimise and manage the effects of surface water flooding? • Will it help London function during periods of drought? • Will it help avoid overheating in the built environment? • Will it support social and physical infrastructure to be resilient to climate change impacts? • Will it minimise the health impacts due to the impacts of climate change? • Will it contribute to ensuring an adequate water supply to London, including by using existing water resources efficiently? 	<p>Climatic Factors</p>
<p>9. Climate Change Mitigation and Energy. To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.</p>	<ul style="list-style-type: none"> • Will it help minimise emissions of greenhouse gases? • Will it help London meet its emission targets, including through off-setting existing emissions? • Will it avoid exacerbating the impacts of climate change? • Will it increase the proportion of energy both purchased and generated from renewable and low carbon resources? • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency? • Will it support community energy projects? 	<p>Climatic Factors, Material Assets</p>
<p>10. Water Quality & Water Resources. To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.</p>	<ul style="list-style-type: none"> • Will it improve the quality of waterbodies? • Will it reduce discharges to surface and ground waters? • Will it promote sustainable urban drainage? • Will it improve the water systems infrastructure (e.g. water supply/sewerage)? • Will it reduce abstraction from surface and ground water sources? • Will it reduce water consumption? • Will it help to meet the objectives of the Water Framework Directive? 	<p>Water</p>
<p>11. Waste. To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.</p>	<ul style="list-style-type: none"> • Will it help minimise the production of waste? • Will it help minimise resource use? • Will it promote reuse and recycling (e.g. in the design of buildings and spaces, etc)? • Will it enable the sorting and handling of waste and recyclable products? • Will it help to promote a market for recycled products? • Will it promote recovery from waste? 	<p>Population, Material Assets</p>

12. Accessibility and Mobility. To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).	<ul style="list-style-type: none"> • Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will it help to provide a more integrated transport service from start to finish (i.e. place of residence to point of service use or place of employment)? • Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce road traffic accidents, especially involving cyclists? • Will it improve physical access to the transport system as well as buildings and spaces? 	Population
13. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.	<ul style="list-style-type: none"> • Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential, including their settings? • Will it conserve and enhance the townscape/cityscape character? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it support and enhance heritage? • Will it improve the wider built environment and sense of place? • Will it conserve and enhance local character? • Will it protect important views across London? • Will it protect and enhance public spaces including historic parks and gardens? 	Cultural Heritage (including architectural and archaeological heritage), Landscape
14. Liveability and Place. To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	<ul style="list-style-type: none"> • Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities? • Will it increase the provision of culture, leisure and recreational activities? • Will it support the provision of quality, affordable and healthy food? • Will it provide opportunities for people to choose an active, fulfilling life? • Will it increase the provision of key services, facilities and employment opportunities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it protect and enhance the provision of open space? • Will it help reduce actual levels of crime and antisocial behaviour? • Will it help reduce damage to the physical and natural environment? • Will it help reduce the perception of crime in an area? • Will it help reduce actual noise levels and disturbances from noise and other nuisance? • Will it protect and improve existing quality of life? • Will it help reduce the risk of terrorist attack? 	Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)
15. Open Space. To protect and enhance natural open space in London.	<ul style="list-style-type: none"> • Will it protect and enhance areas of open space? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? • Will it address areas with deficiencies of access to open space? • Will it promote an appropriate range and type of open space uses? • Will it increase Londoners access for recreation purposes? • Will it promote urban greening? • Will it promote and support the function of the Blue Ribbon Network? 	Biodiversity, Flora, Fauna, Landscape

16. Air Quality. To improve London's air quality.

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

Air

Table 3.2 Scoring System used in IIA

Score	Symbol	Comments
Major positive effect	++	The alterations contribute significantly to the achievement of the objective
Minor positive effect	-	The alterations contribute to the achievement of the objective, but not significantly
No effects	0	The alterations do not have any effect on the achievement of the objective
Minor negative effect	-	The alterations detract from the achievement of the objective, but not significantly
Major negative effect	-	The alterations detract significantly from the achievement of the objective
Uncertain effect	?	The alterations have an uncertain effect on the achievement of the objective

Note: Effects may be scored as uncertain if there is insufficient information available to determine a score. Some policies may also have both positive and negative effects on the objective, and where this is the case an explanation is provided.

3.4 Completing the Assessment

The assessment examines each of the four areas (affected by policy alterations) against each of the 16 IIA objectives. In predicting effects, changes are identified in the baseline which would occur as a result of the implementation of the policy alterations together with the remaining policies in the London Plan. Due to the strategic and forward-looking nature of the policies, quantitative information is not always available to inform the prediction of effects. Where this is the case, the effects have been identified based on professional judgement by experienced technical experts and with consideration to relevant best practice guidance.

3.4.1 Cumulative impacts

Cumulative impacts may occur as a result of multiple policy alterations or in combination with the effects of other plans and programmes. Where a number of policies are focused on one area, such as housing standards, there may be effects on that area from all the policy alterations together. The cumulative effects of the proposed MALP will be assessed as part of its overall appraisal.

3.5 Reasonable Options

The government's housing standards review introduced a single, optional national standard for each of internal space, access and water efficiency in residential development. The transitional arrangements state up to 30th September 2015, planning authorities should not seek standards regarding access, internal space and water efficiency apart from those already in a planning policy document. From 1st October 2015 only standards adopted in a local plan can be secured, and these are to be in line with the governments housing standards.

The proposed Housing Standards MALP reflect the national housing standards as this approach is the only option enforceable. In practice the proposed minor alterations are the republication of policies very similar to those already in the London Plan based on the re-assessment of need and viability.

With regards to energy, the Housing Standards Review states that local planning authorities should not seek standards beyond Code Level 4 equivalent (approximately 19% improvement beyond Part L 2013 Building Regulations) where this is in line with an existing policy.

Given the transitional arrangement, in this instance the do nothing approach would result in no change to existing London Plan policies on housing standards, but in practice the policies could be enforced after 30th October 2015. Therefore the do nothing approach would result in no housing standards apart from those in the Building Regulations. The preferred option alternative is to adopt the national housing standards, which are similar to those already in the London Plan.

Regarding the climate change policies, the alternative is not to update the policies to reflect upcoming changes to national policy or to retain them as they are. Regarding the specific carbon dioxide saving target for non-domestic development, there are options to adopt various figures other than 50%. The 50% target was informed by the evidence as being the preferred and viable option.

3.6 Monitoring

It is a requirement of the SEA Directive to establish how the significant effects of implementing the Housing Standards MALP will be monitored. Monitoring will be focused on the potential significant effects that may give rise to irreversible damage with a view to identifying trends before such damage is caused (or uncertain effects where monitoring would enable preventative or mitigation measure to be undertaken).

3.7 Assumptions and Technical Difficulties

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

3.8 Habitats Regulations Assessment

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

Amendments to a plan must also be subject to HRA to ensure that the plan remains compliant and that those amendments do not introduce new or additional impacts, or make otherwise ‘not significant’ effects ‘significant’.

In this instance as the proposed alterations are limited in scope and not site specific, a full HRA is considered not to be required. In addition, in practice they are generally a re-adoption of existing policy.

4. Assessment of proposed alterations: Energy and Climate Change

4.1 Summary of policy changes affecting Energy and Carbon dioxide

Proposed changes will be made to the following policies in the London Plan;

- Policy 5.2 Minimising Carbon Emissions,

Notable changes to policies include:

1. Re-calibrate the carbon dioxide reduction targets so that they are in line with Building Regulations 2013.
2. Include a carbon reduction target for non-domestic development to apply from 2016.
3. Include a hierarchy setting out how developers should meet the national zero carbon requirement, including the Allowable Solutions element.

These changes can be summarised as:

- General alterations to the policy to ensure it is applied in line with the Government's Written Statement (25th March 2015).
- The general alterations to energy policies are in response to the upcoming 'zero carbon' requirement and Allowable Solutions. These are London specific and should have a positive effect on CO₂ reductions in London. They also aim to retain the financial contributions made as part of the Allowable Solutions within London.
- An increase to the non-residential CO₂ target (Policy 5.2) to provide a clear step to zero carbon buildings.

The re-calibration of the energy targets is not a change in the target, but a clarification. Therefore, the alternative is to leave the policy as it is, out of date. The stepping stone energy target for non-residential development has been informed by the technical and viability study and is therefore the reasonable alternative to the current approach. The support for a local approach to Allowable Solutions is based on the most recent publications and therefore is the most reasonable assumptions.

4.2 Baseline Summary

Since the publication of the FALP in March 2015 there have been minimal changes in the baseline data sources relevant to Energy and Climate Change in this proposed MALP. The main sources of baseline information to have changed are listed below:

- Energy Planning – Monitoring the implementation of London Plan energy policies in 2013 (annual monitoring reports also available for 2010 – 2012); and
- 2011 London Energy and Green House Gas Inventory (LEGGI).

According to statistics from the London Energy and Greenhouse Gas Inventory (LEGGI)⁷, London's domestic sector used 52,587 GWh of energy in 2011, (this was the most up to date data that could be found), the associated carbon dioxide emissions from this energy use were 14.28 Mt. LEGGI data shown in Figure 4.1 below shows London's housing related energy consumption has been steadily falling since 2001 with a significant reduction in use between 2010 and 2011. Associated carbon dioxide emissions have been falling as well, from around 17.54 MtCO₂e in 2000 to 14.28 MtCO₂e in 2011.

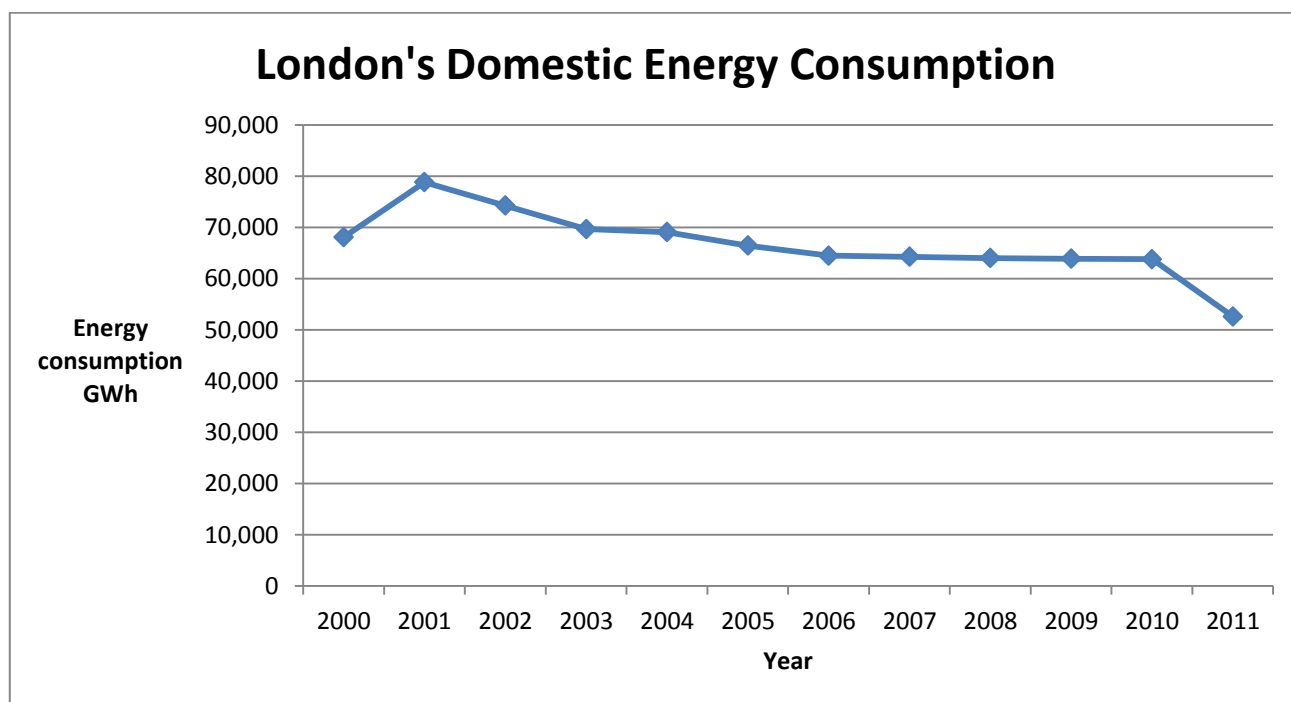


Figure 4.1: A graph of London's domestic Energy Consumption produced using data from LEGGI

⁷ London Energy and Greenhouse Gas Inventory (LEGGI), 2011 available from <http://data.london.gov.uk/dataset/leggi-2011>

Part of this reduction in domestic energy consumption is likely to be attributable to a recent increase in energy efficient behaviours by consumers as a response to the recent economic crisis, reduced average incomes and increased energy bills. But these reductions can also be attributed significant increases in the number of new properties that have onsite or offsite renewable energy features installed. The Figure 4.2 below is a table taken from the July 2013 Energy Planning review⁸ and shows that large numbers of new dwellings have been connected to heat networks or had CHP or solar PV panels between 2010 and 2012.

Table A: Comparison of 2010, 2011 and 2012 figures

	2010	2011	2012
Stage II applications	112	118	171
Number of dwellings in developments	28,181	32,051	55,879
Non-domestic floor area (million m ²)	2.2	1.5	2.3
Regulated CO ₂ emission reductions compared to 2010 Building Regulations (per cent)	33	33	36
Regulated CO ₂ emissions reductions compared to 2010 Building Regulations (tonnes per annum)	35,598	41,136	59,817
Dwellings connected to heat networks	27,000	31,000	53,000
Proposed CHP electrical capacity (MW)	28	17	29
PV Panels (m ²)	22,500	49,000	87,000

Figure 4.2: Comparison table from the July 2013 Energy Planning review

4.2.1 Plans and Programmes (including other key publications of relevance)

Since the publication of the FALP, additional plans and programmes (and other key publications) have been published that are particularly relevant to the assessment. These are listed below.

Energy Planning – Monitoring the implementation of London Plan energy policies in 2013 (annual monitoring reports also available for 2010 – 2012).	Next steps to zero carbon homes – Allowable Solutions, Government response and summary of responses to the consultation, DCLG, July 2014.
The Queen’s Speech 2014 (refer to Zero Carbon homes statements on pages 26 -27 of the document).	The Infrastructure Act 2015(- refers to measures for Off-site carbon abatement measures on pages 26-27). Eric Pickles Written Statement to Parliament 25 March 2015

⁸ Energy Planning; Monitoring the implementation of London Plan energy policies in 2012 (July 2013)

The Government's Written Statement⁹ states that local energy policies that exceed the Building Regulations can continue to be applied, but seeks to limit the energy requirements to Code 4 equivalent. This equates to approximately 19% better than Building Regulations 2013. The London Plan seeks a 35% improvement on the Building Regulations 2013, a further 15% beyond Code 4. The energy element beyond Code 4 will generally be sought from low and zero carbon infrastructure, in line with approach set out in the National Planning Policy Framework. The proposed minor alterations will continue to apply this standard. The proposed Housing Standards MALP outline how the London Plan policy 5.2 falls within the Government's approach.

4.3 Assessment of effects

This section sets out the assessment of the Energy and Carbon dioxide related effects on the proposed Housing Standards MALP. This assessment has been presented under the 16 sustainability objectives listed below in grey boxes. The effect of policy change on each objective is scored using the system previously identified in Table 3.2.

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The updating and re-calibration of the energy targets, plus the non-domestic 2016 'stepping stone' target provide clarity to developers for future investment and continue to support large scale energy infrastructure. This infrastructure can be a catalyst for regeneration. As these targets have been in place since 2011 and are applied with regards to viability and feasibility it is unlikely to incur additional costs to developers. The guidance on Allowable Solutions is more likely to encourage re-investment in London. **Minor positive effect**

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

The clarification of the application of the energy targets for residential development means developers are more likely to continue to reach higher energy targets, resulting in warmer buildings for occupants with lower energy bills. **Minor positive effect**

⁹ Eric Pickles Written Statement to Parliament 25 March 2015

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

For the same reasons as explained under Health and Wellbeing, policy changes will have a small benefit to those with protected characteristics, especially the elderly and children who tender to suffer from the cold. **Minor positive effects**

5. Housing: To ensure that all Londoners have access to good quality, well-located housing that is affordable.

Similar to regeneration and land use, the updating and re-calibration of the energy targets provide clarity to housing developers. As these targets have been in place since 2011 and are applied with regards to viability and feasibility it is unlikely to incur additional costs to housing developers. **Minor positive effect**

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

For the same reasons as explained under regeneration and land, jobs will be continued to be provided in London in the energy sector, whilst not impacting building jobs. The encouragement to re-invest Allowable Solutions in London is more likely to generate local employment. **Minor positive effect**

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

As per employment the preferred approach is likely to result in a more stable economy with specific support for the green economy in London. **Minor positive effect**

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

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The updating and re-calibration of the energy targets, plus the non-domestic 2016 'stepping stone' target provide clarity to developers for future investment and continue to support energy infrastructure. Along with the proposed hierarchy for the investment of Allowable Solution, this preferred approach should result in continued and additional carbon dioxide savings across London.

Minor positive effect

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects**

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/ landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

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

The clarification of the application of the energy targets for development means developers are more likely to continue to reach higher energy targets, resulting in buildings that are more pleasant to work and live in for occupants with lower energy bills. **Minor positive effect**

15. Open Space: To protect and enhance natural open space in London.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

16. Air Quality: To improve London's air quality.

The clarification of the application of the energy targets for development means developers are more likely to continue to reach higher energy targets. The outcomes for air quality are unknown as it depends on how the developers choose to reach the energy targets and what energy infrastructure is provided. Boilers and CHP contribute to poorer air quality, whereas heat pumps and PVs have no effect. In addition, technology is constantly improving and changing. The changes in policies are considered to have an unknown effect upon this objective. **Unknown effect.**

5. Assessment of proposed alterations: Water Efficiency

5.1 Summary of policy changes affecting: Water efficiency

Proposed changes will be made to the following policy in the London Plan:

- Policy 3.5 Quality and design of housing development
- Policy 5.15 Water Use and Supplies.

Notable changes to the policy include:

Changes to policy 3.5 and 5.15 to confirm the London Plan water efficiency target is in line with the Building Regulation 'optional requirement' for water efficiency for internal water use. However, in addition to the London Plan policy's aim for a maximum of 105 litres of domestic water consumption per head per day, the 'optional requirement' for water efficiency allows for an additional 5 litres per head for external water use.

These changes can be summarised as:

1. This approach is to re-introduce the London Plan water efficiency target of 105 litres per person per day through the 'optional requirement' in the Building Regulations, based on need and viability and provide clarity for developers. Without the re-adoption of the existing London Plan policy, justified by need and viability, only the baseline Building Regulation water consumption of 125 l/person/day can be applied and secured.

5.2 Baseline Summary

Since the publication of the FALP (in March 2015) there have been minimal changes in the baseline information relevant to the key area of Water in this proposed MALP. The main sources of baseline information to have changed are listed below:

- Thames Water: Final Water Resource Management Plans 2015 -2040
- Affinity Water: Final Water Resource Management Plans 2015 -2020
- Essex and Suffolk Water: Final Water Resources Management Plan 2014
- Sutton and East Surrey Water: Final Water Resources Management Plan

Water demand in London is forecast by all four main water companies serving the Greater London area to increase over the next few decades. London is already a water stressed area, for example, rainfall in London is lower per Capita than places such as Rome, Dallas and Istanbul, and there have been five major droughts in the last 90 years¹⁰. Thames Water supply demand balance in London is predicted to be in deficit of 59 MI/d in 2014/2015, increasing substantially to a deficit of 414 MI/d by 2039/2040, with this trend show in Figure 5.1. The household demand forecast was based on applying a 125 l/h/d figure (higher than the Part G optional requirement that is being adopted in the proposed MALP), but lower than the existing average consumption rate of 164 l/person/day¹¹. Other Water supply companies are also reporting a deficit in their supply demand forecasts, for example, Affinity water predicts that its total baseline supply demand deficit will be 111.20 ML/day by 2039-2040.¹²

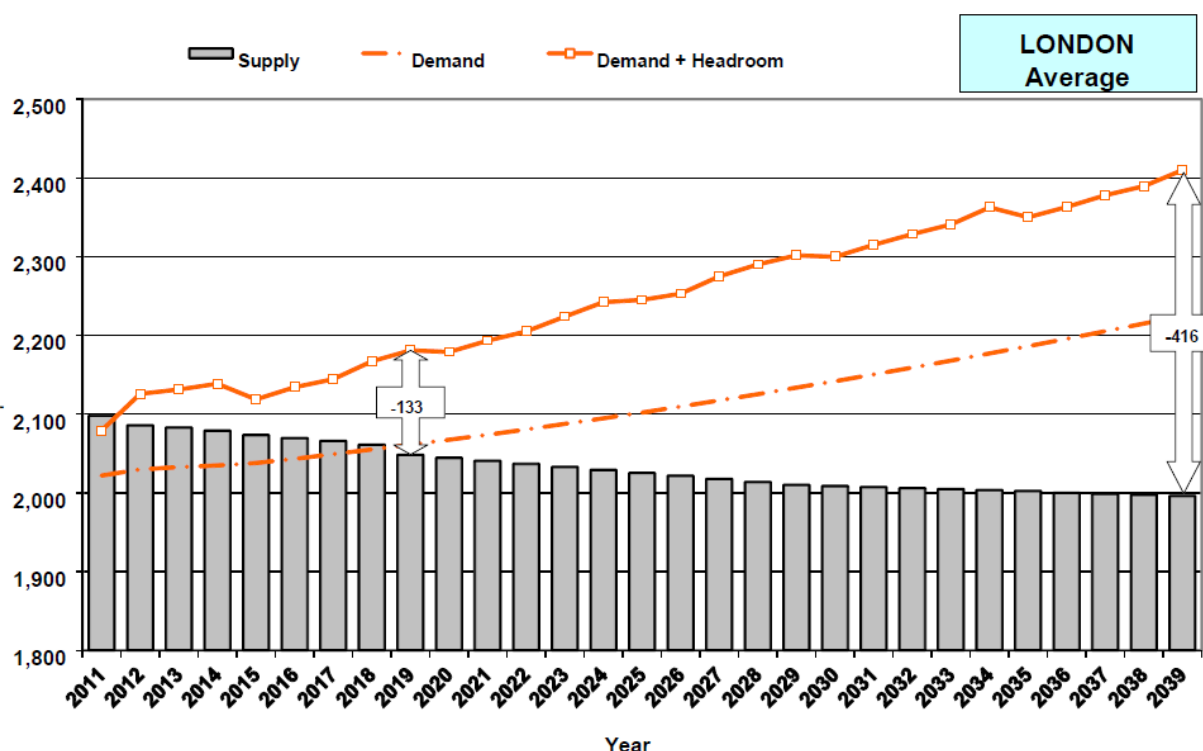


Figure 5.1: A baseline Supply Demand graph taken from Thames Water, Final Water Resources Management Plan 2015-2040

¹⁰ Final Water Resources Management Plan 2015-2040, Thames Water, http://www.thameswater.co.uk/tw/common/downloads/wrmp/WRMP14_Section_1.pdf

¹¹ Environment Agency. State of the Environment Report. 2013

¹² Affinity Water: Final Water Resource Management Plans 2015 -2020, <https://stakeholder.affinitywater.co.uk/docs/FINAL-WRMP-Jun-2014.pdf>

A combination of increased water demand from future population growth and the pressures from increasing extreme weather (as a result of predicted effects of climate change) are cited as reasons for increasing pressure of water supplies in London over the next few decades by all the water supply companies.

5.2.1 Plans and Programmes (including other key publications of relevance)

Since the publication of the FALP, additional plans and programmes (and other key publications) have been published that are particularly relevant to the assessment. These are listed below.

Thames Water: Final Water Resources Management Plan, 2015-2020.	Essex and Suffolk Water: Final Water Resources Management Plan 2014.
Affinity Water: Final Water Resources Management Plan, 2015-2020.	Sutton and East Surrey Water: Final Water Resources Management Plan (June 2014).
Deregulation Act 2015	
Approved Document G - Sanitation, hot water safety and water efficiency (2015 edition)	Eric Pickles Written Statement to Parliament 25 March 2015

5.3 Assessment of effects

This section sets out the assessment of the water efficiency related effects of the proposed Housing Standards MALP. This assessment has been presented under the 16 sustainability objectives listed below in grey boxes. The effect of policy change on each objective is scored using the system previously identified in Table 3.2.

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

Whilst in practice the policy change may result in a small increase in water use due to the 5 litre allowance for outdoor water use, if the preferred approach is not adopted water consumption could increase more significantly, in line with the baseline Building Regulation standard of 125 l/person/day. Although additional housing is a relatively small proportion of existing housing, (which has an average water use of 164l/person/day), given the anticipated growth in population the preferred approach will lengthen the period before an additional water source such as a new reservoir or desalination plant are required, enabling that land to be used for more productive uses. **Minor positive effect**

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

Whilst in practice the policy change may result in a small increase in water use due to the 5 litre allowance for outdoor water use, if the preferred approach is not adopted water consumption could increase more significantly, in

line with the baseline Building Regulation standard of 125 l/person/day. This could result in additional abstraction and pressure on other water sources also required by flora and fauna. **Minor positive effect.**

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

The preferred approach is unlikely to result in any significant changes on health or well-being. **No effects.**

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

The preferred approach will result in housing being designed so that the occupants use less water than the do nothing approach. New housing is generally metered for water use and therefore the preferred approach could save new occupants money, minimising poverty. **Minor positive effect**

5. Housing: To ensure that all Londoners have access to good quality, well-located housing that is affordable.

The policy changes will mean that developers will continue to have to build housing with high water efficiency compared to the 'do nothing' option. As outlined by the viability study, it is considered that there will be no additional cost to developers as they are already applying this standard. Overall this will help to improve the quality of new housing. **Minor positive effect.**

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

As it is considered that housing developers will not incur additional costs from the existing way they provide housing, the changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

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

Whilst in practice the policy change may result in a small increase in water use due to the 5 litre allowance for outdoor water use, if the preferred approach is not adopted water consumption could increase more significantly, in line with the baseline Building Regulation standard of 125 l/person/day. This would require a greater amount of abstraction from surface and groundwater resources. The ‘do nothing’ approach would have a greater negative effect on climate change adaption. **Minor positive effect.**

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

Reduced water demand will also help to reduce energy consumption in pumping the water to new homes (a major consumer of energy) and through a reduction of energy related to the heating of hot water. Together this will contribute to reducing associated greenhouse gas emissions, helping with climate change mitigation efforts. **Minor positive effect.**

10. Water Quality & Water Resources: To protect and enhance London’s waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.

Reduced extraction could help to increase fresh water supply to the water bodies that feed London and in turn help to dilute pollutants and enhance water quality. **Minor positive effect.**

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

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

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

15. Open Space: To protect and enhance natural open space in London.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

16. Air Quality: To improve London's air quality.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

6. Assessment of proposed alterations: Residential Space Standard

6.1 Summary of policy changes affecting: Residential Space Standard

Proposed changes will be made to the following policies in the London Plan:

- Policy 3.5 Quality and Design of Housing Developments

These changes can be summarised as;

- The adoption of Nationally Described Space Standards (NDSS), which will replace London Plan policy.
- A 1-3% reduction from the London Plan space standard for larger two and three storey dwellings which is shown in the updated minimum space standards for new development Table 3.3.
- Whilst there is some small variation between the proposed Housing Standards MALP standards and the existing London Plan standards, following the publication of the Government's policy statement, these are the only standards that can be applied to new housing.

It should be noted that although the London Plan has policies on residential space standards **only** the national standards can be applied (following a demonstration that they are necessary and viable). The proposed alterations provide clarity on this matter across London. The Written Statement to Parliament (25th March 2015) on the Technical housing standards sets out transitional arrangements to the move to the NDSS. From 1st October 2015 only standards adopted in a local plan can be secured, based on need and viability, and these are to be in line with the governments housing standards. Therefore, in this instance the 'do nothing' option would result in the loss of existing residential space standards, whereas the preferred option would re-introduce/retain standards similar to the existing standards.

6.2 Baseline Summary

Since the publication of the FALP there have been minimal changes in the baseline information relevant to the key area of Space in this proposed Housing Standards MALP. The main sources of baseline information to have changed is listed below:

- English Housing Survey (2012-2013).
- London Annual Monitoring Report 10, 2012 – 2013.

6.2.1 Plans and Programmes (including other key publications of relevance)

Since the publication of the FALP, additional plans and programmes (and other key publications) have been published that are particularly relevant to the assessment. These are listed below.

London Plan Annual Monitoring Report 10, 2012-13.	Homes for London: The London Housing Strategy; Draft for London Assembly 2014.
The 2013 London Strategic Housing Market Assessment.	The Housing Standards Review Consultation 2014.
The London Strategic Housing Land Availability Assessment 2013.	Eric Pickles Written Statement to Parliament (25 th March 2015)
Deregulation Act 2015.	Technical housing standards – nationally described space standard (25 th March 2015).

6.3 Assessment of effects

This section sets out the assessment of the Space related effects of the proposed Housing Standards MALP. This assessment has been presented under the 16 sustainability objectives listed below in grey boxes. The effect of policy change on each objective is scored using the system previously identified in Table 3.2.

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The ‘do nothing’ approach would enable housing developers to build dwellings to the smallest size acceptable to their market. However, in London the housing market is broad and not all existing dwellings are provided at the smallest possible size. The preferred approach would retain standards similar to existing. Both the existing and new standard can be applied flexibly to cater for site specific circumstances. Therefore in this instance the effects on land take are unknown but the flexibility in application means there will be a negligible effect. **No effects / Unknown effect**

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The preferred approach doesn’t dictate site coverage or external features such as landscaping and greenroofs. Therefore it is considered that this approach will have no significant effects. **No effects.**

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

Without the preferred option there would be no space standards applied across London, unless adopted locally. This would result in those with the least housing choice more likely to only afford small units which can have a detrimental effect on health and well-being. Therefore, the preferred approach will have a positive effect. **Positive effect.**

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

Without the preferred option there would be no space standards applied across London, unless adopted locally. This would result in those with the least housing choice more likely to only afford small units which can have a detrimental effect on poverty and social exclusion. The ‘do nothing’ approach is more likely to have a negative effect on families and some faith groups that have larger families. Therefore the preferred approach is likely to have an overall positive effect for those with protected characteristics, who may also have reduced housing choice due to cost. **Positive effect.**

5. Housing: To ensure that all Londoners have access to good quality, well-located housing that is affordable.

Without the proposed Housing Standards MALP, the national space standards would not apply, unless adopted locally. Therefore, the proposed MALP are positive with regards to housing quality. Furthermore, housing to this standard is already being delivered and demonstrated to be viable. This is supported by the most recent viability study supporting the Housing Standards MALP. Any potential impact on housing delivery is likely to be negligible. **Positive effects.**

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The viability study demonstrates that the application of the residential space standards is viable and therefore the changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The viability study demonstrates that the application of the residential space standards is viable and therefore the changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

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

High ceiling heights are important for natural ventilation and will become increasingly important as the effects of climate change are felt. In practice the new proposed ceiling height of 2.3m (in line with the national standard) is lower than what is currently applied through the London Plan policy / Housing SPG. However without the proposed Housing Standards MALP there would be no minimum floor to ceiling height. As a mitigation measure the proposed MALP includes wording to strongly encourage the continued provision of ceiling heights of 2.5m. Therefore the changes in policies are considered to have a positive effect upon this objective. **Minor positive effects.**

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

Smaller units have reduced energy usage, due to reduced heating requirements. This could help to mitigate the climate change impact of these developments. Without the preferred option there would be no space standards applied across London, unless adopted locally. It is unknown how this would effect dwellings sizes as some units, under the existing London Plan space standards are provided at a larger size than required. It is likely that some units would be smaller. However, any change in energy use do to unit size is unlikely to be significant. **No effects.**

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The changes in policies are not considered to have no effect on this objective. **No effects.**

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

Without the preferred option there would be no space standards applied across London, unless adopted locally. It is unknown how this would effect dwellings sizes as some units, under the existing London Plan space standards are provided at a larger size than required. However, it is likely that some units would be smaller. This would negatively effect the flexibility of the space for installation of accessibility and mobility features. Therefore, the proposed Housing Standards MALP are likely to have a positive effect for those with restricted mobility, who may have reduced housing choice. **Positive effect**

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

Without the preferred option there would be no space standards applied across London, unless adopted locally. It is unknown how this would effect dwellings sizes and height as some units, under the existing London Plan space standards are provided at a larger size than required. It is likely some dwellings would be smaller and some would remain larger, and therefore there would be some effect on housing design. However, in line with wider design policies housing design should remain positive. **No effect.**

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

Without the proposed Housing Standards MALP, there would be no residential space standards after September 2015 and therefore the preferred option to adopt the nationally prescribed standards would have a positive effect on the living environment for occupants, and the provision of adequate space could prevent residents having to move more often, result in a more stable community. **Positive effects.**

15. Open Space: To protect and enhance natural open space in London.

The preferred approach doesn't dictate site coverage or external features such as landscaping. **No effects.**

16. Air Quality: To improve London's air quality.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

7. Assessment of proposed alterations: Accessibility

7.1 Summary of policy changes affecting: Accessibility

Proposed changes will be made to the following policies in the London Plan;

- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.8 Housing Choice

Notable changes to policies include;

1. A reference to the government's optional accessibility and adaptability requirements M4(2) and M4(3) from Part M of Schedule 1 of the Building Regulations 2010 (2015 version).
2. A reference which in effect will require '90 per cent of London's future housing to be built to 'The Lifetime Homes' standards be 'M4 Category 2 - Accessible and adaptable dwellings' and 10 per cent (as existing) to be designed to be wheelchair accessible or easily adaptable for wheelchair users 'M4 Category 3 - Wheelchair user dwellings.'

These changes can be summarised as:

1. The Lifetime Homes Standard will be replaced by M4 (2) Category 2 – Accessible and Adaptable Housing.
2. Existing wheelchair housing standards will be replaced by M4(3) Category 3 – Wheelchair user dwellings in Part M (Access to and use of buildings) of the Building Regulations.

These revised standards have been set out by the Government in its Written Statement to Parliament on 25th March 2015. From October 2015 these will be the only standards that can be conditioned on a planning application, subject to them being adopted in a Local Plan and tested for need and viability. The standards will be enforced through the building control process, strengthening their delivery.

7.2 Baseline Summary

Since the publication of the FALP (in March 2015) there have been minimal changes in the baseline information relevant to the key area of Accessibility in this proposed MALP. The main sources of baseline information to have changed are listed below:

- English Policy Paper: Health, Housing and Ageing, The Housing and Ageing Alliance (2013).

- Lifetime Neighbourhoods, December 2011, Department for Communities and Local Government.

No Baseline information has been found to suggest levels of accessibility in existing London housing stock.

The London Annual Monitoring Report, reports on the number of applications that have been approved to lifetime homes standards and wheelchair housing standards.

7.2.1 Plans and Programmes (including other key publications of relevance)

Since the publication of the FALP, additional plans and programmes (and other key publications) have been published that are particularly relevant to the assessment. These are listed below.

The Valuing Older People: The Mayor of London's Older People Strategy Annual Report (2007).

The Mayor's Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

Approved Document M: Volume 1 - Access to and Use of Dwellings

7.3 Assessment of effects

This section sets out the assessment of the Accessibility related effects of the proposed Housing Standards MALP. This assessment has been presented under the 16 sustainability objectives listed below in grey boxes. The effect of policy change on each objective is scored using the system previously identified in Table 3.2.

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

From October 2015, without the Housing Standards MALP there will be no access standards across London, unless adopted locally. There are currently various wheelchair and access standards across London and therefore the proposed MALP will introduce a uniform standard across London. The potential reduction in costs, risks and administrative burden to housing developers, could help to streamline the house building process and improve delivery. The 'do nothing' approach would enable housing developers to build dwellings without providing accessible or adaptable housing beyond the baseline Building Regulations. The preferred approach would retain standards similar to existing and therefore, in this instance the effects of the 'preferred approach' on housing deliverability is considered to be negligible. **No effect.**

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

The ‘preferred’ approach would require housing developers to include accessible or adaptable housing in their developments. The ‘do nothing’ approach would result in the loss of enhanced access standards, apart where adopted locally. Whilst the standards are similar to those already in the London Plan, without the proposed MALP the existing London Plan standards could not be enforced after September 2015. The preferred approach strengthens delivery as the standards will be enforced through Building Regulations. This will result in higher compliance levels and allow easier enforcement. This is likely to have a positive effect on the health and well-being for those that require accessible housing. **Positive effects.**

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

London’s ageing and diverse population is likely to necessitate a more accessible housing stock. The ‘preferred’ approach would require housing developers to include accessible or adaptable housing in their development. The ‘do nothing’ approach would result in the loss of enhanced access standards, apart where adopted locally. Whilst the standards are similar to those already in the London Plan, without the Housing Standards MALP the existing London Plan standards could not be enforced after September 2015. The preferred approach strengthens delivery as the standards will be enforced through Building Regulations. This will result in higher compliance levels and allow easier enforcement. This is likely to have a positive effect on those with disabilities needing accessible homes and the elderly or those with children who may need more readily adaptable homes. The GLA’s proposal that ninety percent of new homes are built to ‘Accessible and adaptable dwellings’ and ten percent of new housing ‘is designed to be wheelchair accessible, or adaptable for residents who are wheelchair users’ re-enforces the current London Plan approach to meet the accessibility needs of residents and to support them to live more independently in future. Therefore this approach specifically supports those with disabilities and the elderly and supports and their social inclusion. In practice there may be a small reduction in the provision of homes built to Lifetime Homes standards, where no lift is provided. However, the proposed Housing Standards MALP includes guidance to maximise the M4(2) standard subject to viability. **Positive effect.**

5. Housing: To ensure that all Londoners have access to good quality, well-located housing that is affordable.

London’s ageing and diverse population is likely to necessitate a more accessible housing stock. The proposed Housing Standards MALP will result in uniform access standards across London. This will simplify housing delivery for developers and could increase viability and delivery of housing schemes. The proposed Housing Standards MALP will also ensure a range of housing type, including with disabled access and other accessibility features are delivered. Whilst this approach is very similar to existing London Plan policies, there is a change to the ‘lifetime homes’/M4(2) standard which must now be step free. Given the number of dwellings delivered as flats this could reduce the number of dwellings delivered to M4(2) as their delivery would be subject to the provision of

a lift, which would be subject to a viability assessment. However the only alternative to this approach is no policy. Therefore the proposed MALP are considered to have a positive effect on this objective. **Minor Positive effect.**

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The proposed Housing Standards MALP will result in uniform access standards across London. This will simplify housing delivery for developers and could increase viability and delivery of housing schemes. Therefore employment is likely to remain steady. However, the assumed reduction in costs, risks and administrative burden to housing developers that these changes may result in, is unlikely to have any effect significant effects on employment. **No effects.**

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The proposed Housing Standards MALP will result in uniform access standards across London. This will simplify housing delivery for developers and could increase viability and delivery of housing schemes. However, the assumed reduction in costs, risks and administrative burden to housing developers that these changes may result in, is unlikely to result in any stimulation of the house building sector and local economy. **No effects.**

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

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the

proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

London's ageing and diverse population is likely to necessitate a more accessible housing stock. The proposed Housing Standards MALP seeks to adopt the national standards on access as from October 2015 only standards (the national standards) adopted through a Local Plan and demonstrated to be necessary and viable can be applied. Whilst this approach is very similar to existing London Plan policies, there is a change to the 'lifetime homes'/M4(2) standard which must now be step free. Given the number of dwellings delivered as flats this could reduce the number of dwellings delivered to M4(2) as their delivery would be subject to the provision of a lift, which would be subject to a viability assessment. However the only alternative to this approach is no policy. The adoption of the national standards also improves enforcement of the policy approach as it will be administered through the building control process. Therefore the proposed Housing Standards MALP are considered to have a positive effect on this objective. **Positive effect.**

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

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

London's ageing and diverse population is likely to necessitate a more accessible housing stock. The proposed Housing Standards MALP seeks to adopt the national standards on access as from October 2015 only standards (the national standards) adopted through a Local Plan and demonstrated to be necessary and viable can be applied. Whilst this approach is very similar to existing London Plan policies, there is a change to the 'lifetime homes'/M4(2) standard which must now be step free. Given the number of dwellings delivered as flats this could reduce the number of dwellings delivered to M4(2) as their delivery would be subject to the provision of a lift, which would be subject to a viability assessment. However the only alternative to this approach is no policy. The adoption of the national standards also improves enforcement of the policy approach as it will be administered through the building control process. In addition the adoption of the national standards means that the policy is more enforceable as it is applied the Building Regulations. Therefore the proposed MALP are considered to have a positive effect on this objective. **Positive effect**

15. Open Space: To protect and enhance natural open space in London.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

16. Air Quality: To improve London's air quality.

The changes in policies are not considered to have a positive or negative effect upon this objective. **No effects.**

8. Summary of findings

8.1 Summary of impact area effects

Table 8.1 presents a summary of the effects of the policy changes against each of the IIA Objectives. The qualitative scoring system used to assess the likely effects is shown in the key. The policies should be read alongside the Housing Standards MALP as a whole, as no policy applies in isolation (for example, changes in space requirements can also have a knock on effect accessibility requirements).

Table 8.1 Appraisal table summarising effects on all policy impact areas.

Key Area	1. Regeneration & Land-Use	2. Biodiversity	3. Health and Well-being	4. Equalities	5. Housing	6. Employment	7. Stable Economy	8. Flood Risk and Climate Change Adaptation	9. Climate Change Mitigation and Energy	10. Water Quality & Water Resources	11. Waste	12. Accessibility and Mobility	13. Built and Historic Environment	14. Liveability and Place	15. Open Space	16. Air Quality
Energy and Climate Change	+	0	+	+	+	+	+	0	+	0	0	0	0	+	0	?
Water Efficiency	+	+	0	+	+	0	0	+	+	+	0	0	0	0	0	0
Space	0/?	0	++	++	++	0	0	+	0	0	0	++	0	++	0	0
Accessibility	0	0	++	++	+	0	0	0	0	0	0	++	0	++	0	0

Table 8.2 Key for score policy impacts

Key	Description
++	The policy is likely to contribute significantly towards the IIA objective.
+	The policy is likely to contribute positively towards the IIA objective, although not significantly.
0	The policy is considered to have no significant positive or negative effect.
-	The policy is likely to detract from the achievement of the IIA objective, although not significantly.
--	The policy is likely to detract significantly from the achievement of the IIA objective.
?	The policy has an uncertain relationship to the IIA objective or is dependent on the way in which the policy is implemented. Alternatively, insufficient information may be available to enable an assessment to be made.
~	There is no relationship between the policy and the IIA objective.

8.2 Other Potential Cumulative Effects

There are no other potential cumulative effects identified, e.g. with respect to these policy changes alongside other relevant strategies considered in this IIA Report.

9. Conclusions and Recommendations

9.1 Key Findings from the IIA

This report was limited to the alterations under review. The proposed Housing Standards MALP are not a full review of the London Plan 2011, and so not all policy areas are being altered. The proposed Housing Standards MALP addressed:

- Energy and Carbon dioxide;
- Water efficiency in residential development;
- Residential space standards; and
- Accessibility in residential development.

This IIA covers the proposed Housing Standards MALP which generally address the Government's Housing Standards Review, and arise from a commitment made to the Government during the publication of FALP. There are also proposed changes the energy policies in anticipation of the introduction of 'zero carbon' housing and Allowable Solutions.

This IIA Report presents an assessment of the environmental, social and economic performance of the proposed MALP against a set of sustainability objectives.

9.2 Next Steps

This IIA Report is issued for consultation alongside the draft Housing Standards MALP. Consultation will last for 6 weeks from **11th May 2015** to **22nd June 2015**. Following receipt of comments on the draft Housing Standards MALP and the IIA Report, an Examination in Public (EIP) will be carried out in September 2015. The EIP Inspector will make recommendations to the Mayor. Following consideration of these recommendations, the Mayor will inform the Secretary of State for Communities and Local Government that he intends to publish the new Housing Standards MALP. Following approval from the Secretary of State, the Mayor will submit the 'intend to publish' Housing Standards MALP to the London Assembly for their consideration. The Assembly then has 21 days within which it can reject the alterations by a two thirds majority if it so wishes.

Appendix A

List of Abbreviations

BAME	Black, Asian and Minority Ethnic
CDE	Construction, Demolition and Excavation
CsIA	Community Safety Impact Assessment
DRLP	Draft Replacement London Plan
EA	Environment Agency
EqIA	Equalities Impact Assessment
G&T	Gypsies and travellers (including travelling show people)
GLA	Greater London Authority
GOL	Government Office for London
HRA	Habitats Regulations Assessment
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
KPI	Key Performance Indicator
LDA	London Development Agency
LDF	Local Development Framework
LGTU	London Gypsy & Travellers Unit
LSDC	London Sustainable Development Commission
ONS	Office for National Statistics
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPG	Supplementary Planning Guidance

