



Early Minor  
Alterations to The  
London Plan

Integrated Impact  
Assessment

IIA Report – Draft for  
consultation

January 2012

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Prepared for:  
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## 1 INTRODUCTION

- 1.1.1 URS was commissioned by the Mayor to undertake an independent Integrated Impact Assessment (IIA) of the Early Minor Alterations to the London Plan (EMALP). This report sets out the findings of the IIA of the public consultation version of the EMALP. An IIA considers the impacts of a draft plan or strategy prior to its finalisation, by assessing it against a range of evidence-based issues with a view to achieving a more sustainable plan. An IIA seeks to assess a range of issues - including in relation to sustainability, health, equalities, the environment and community safety - as part of one integrated plan-making process. In doing so, the intention is that the opportunities for synergies can be better realised.
- 1.1.2 The IIA incorporates:
- a Sustainability Appraisal (SA) (including Strategic Environmental Assessment<sup>1</sup> (SEA)) – an examination of the Early Minor Alterations' impact on the environment, society and the economy;
  - an Equalities Impact Assessment (EqIA) – an examination of the Early Minor Alterations' differential impact on Equality Groups, which will be undertaken as part of the full IIA process outlined below, and also be made available as a stand-alone report;
  - a Health Impact Assessment (HIA) – an examination of the Early Minor Alterations' impact on human health; and
  - a Community Safety Impact Assessment (CSIA) – an examination of the Early Minor Alterations' impact on people's quality of life with regards to the threats that result from the criminal or anti-social behaviour of others and the way in which those afflicted are helped to cope.
- 1.1.3 The IIA approach also meets a number of legal duties to which the Mayor is subject. These include:
- a duty under the GLA Act 1999 (as amended) to promote the reduction of health inequalities and to have regard to the effects of his strategies on reducing health inequalities in London;
  - a duty under the GLA Act 1999 (as amended) regarding the achievement of sustainable development in relation to his strategies and have regard to the effects of his strategies on achieving sustainable development;
  - a duty under the GLA Act 1999 (as amended) to ensure that equalities issues are considered in the development of plans and strategies. This is usually considered through an Equalities Impact Assessment. The GLA is also subject to the public sector duty arising from the Equality Act 2010;
  - Section 17 of the Crime and Disorder Act 1998. The Police and Justice Act 2006 has broadened the scope of Section 17 to encompass substance misuse, anti social behaviour and behaviour which adversely affects the environment;

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<sup>1</sup> Directive 2001/42/EC on The Assessment of The Effects of Certain Plans And Programmes on the Environment

- the requirement to undertake a SEA on plans and strategies that are considered to have significant effects on the environment; and
- a requirement to undertake a Habitats Regulation Assessment (HRA) in relation to habitats of particular significance in and around London. An initial HRA screening was undertaken by the GLA. This concluded that it is not necessary to undertake a full HRA. Natural England has indicated that it is happy with this approach.

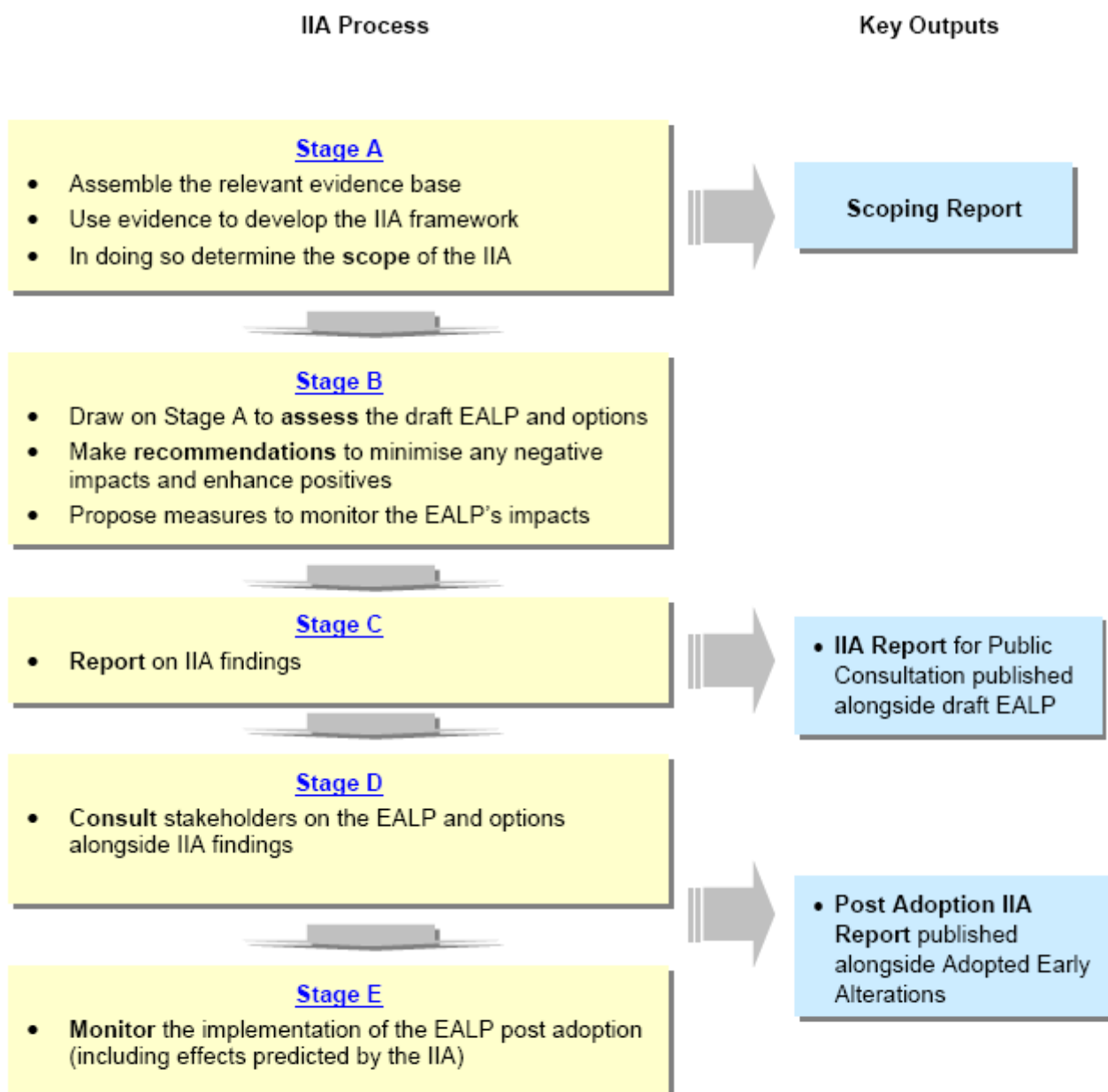
## 1.2 Sustainability Appraisal / Strategic Environmental Assessment

- 1.2.1 Strategic Environmental Assessment (SEA)<sup>2</sup> involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan, strategy or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans, strategies and programmes.
- 1.2.2 The Government's approach is to incorporate the requirements of the SEA Directive into a wider process that considers economic and social as well as environmental effects. This combined process is known as 'Sustainability Appraisal (SA)'. An SA (incorporating SEA) of the EMALP is required by the Government Office for London Circular 1/2008, which states (in Section 3.6) that:
- 'The sustainability appraisal, incorporating SEA, of the SDS [Spatial Development Strategy] should allow for a systematic and iterative testing of the emerging proposals.'*
- 1.2.3 The Circular also states that:
- 'The approach to these assessments [SEA and SA] should take account of relevant guidance. Assessment[s] should be proportionate, taking into account the scale and extent of the alterations or review proposed. It should build on previous assessments that have been undertaken.'*
- 1.2.4 The Plan Making Manual (PMM) published by the Planning Advisory Service (PAS) in 2009 also provides guidance on undertaking SEA and SA.
- 1.2.5 The approach to this IIA is based on the five stages of the SA process as detailed in figure1-1 below

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<sup>2</sup> Directive 2001/42/EC on The Assessment of The Effects of Certain Plans And Programmes on the Environment

**Figure 1-1: Stages of the IIA**





## **Stage A – Framework and Evidence Base**

- 1.2.6 Stage A in the IIA process involves developing the framework for undertaking the assessment – in this case the identification of a series of topics and objectives on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report – which may be accessed from the [GLA website](#). The evidence base presented in the Scoping Report includes key messages from the policy context; a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address.

## **Stage B – Assessment**

- 1.2.7 Stage B in the IIA process involves undertaking the assessment itself. This involves identifying and evaluating the impacts of the different options available to the plan makers as well as the preferred options / policies which together comprise the plan. The assessment is organised around the framework identified in Stage A and informed by the evidence base assembled at Stage A. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the assessment should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.

## **Stage C – Reporting**

- 1.2.8 Stage C in the IIA process involves documenting the appraisal findings and preparing an IIA Report (this incorporates the material required for inclusion in the 'Environmental Report' under the 'SEA Directive'). The full IIA Report should be published for consultation alongside the 'public consultation' version of the plan in question.

## **Stage D - Consultation**

- 1.2.9 Stage D in the IIA process involves consulting on the 'public consultation' version of the plan and the accompanying IIA Report.

## **Stage E - Monitoring**

- 1.2.10 Stage E in the IIA process involves monitoring the adopted plan including its sustainability impacts; this is done through the London Plan Annual Monitoring Report (AMR).

### 1.3 Equalities Impact Assessment

- 1.3.1 Guidance on EqIA suggests a systematic process which is largely consistent with the SA process, but focuses on the needs of, and impacts on, specific groups and the distribution of impacts. The need for EqIA is driven by Section 149 of the Equality Act 2010 which sets out the public sector equality duty and the defined 'protected characteristics'. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended).
- 1.3.2 Section 149 of the Equality Act 2010 replaces duties under the Race Relations Act, the Disability Discrimination Act 2005 as well as other domestic discrimination legislation. The Act includes a new single public sector equality duty ("the Duty") which brings together the previous race, disability and gender duties. The following are referred to as protected characteristics and are the grounds upon which discrimination is unlawful:
- age;
  - disability;
  - gender reassignment;
  - pregnancy and maternity;
  - race;
  - religion or belief;
  - sex;
  - sexual orientation; and
  - marriage and civil partnership (applicable only to the need to eliminate unlawful discrimination).
- 1.3.3 As required by The Duty, the Mayor and the GLA, when exercising their functions, must have due regard to the following:
- **Eliminating unlawful discrimination, harassment and victimisation** and any other conduct which is unlawful under the Equality Act 2010;
  - **Advancing equality of opportunity** between people who share a protected characteristic, and those who don't have that characteristic. This means in particular:
    - **Removing or minimising disadvantages** suffered by people who share a protected characteristic that are connected to that characteristic;
    - **Taking steps to meet the needs of people** who share a protected characteristic that are different from the needs of people who don't have that characteristic; and
    - **Encouraging people** who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low;
  - **Fostering good relations** between people who share a protected characteristic, and those who don't have that characteristic. This means, in particular:

- Tackling prejudice
- Promoting understanding.

1.3.4 EqlA also requires adequate consultation and engagement with different stakeholders. The EqlA has been undertaken with regard to GLA and Equality and Human Rights Commission (EHRC) guidance.

1.3.5 The EqlA form a part of the full IIA and is also available as a stand-alone report. This will assist the GLA in demonstrating it has fulfilled its Section 149 duties in relation to the EMALP.

## 1.4 Health Impact Assessment

1.4.1 The Mayor has a duty under the GLA Act 1999 (as amended) to promote a reduction in health inequalities and to have regard to the effects of his strategies on reducing health inequalities. The Mayor's Best Practice Guidance on Health Issues in Planning (2008) identified IIA as an efficient way to ensure health is considered at an early stage of plan/policy development. Housing is a significant determinant of health and the different housing conditions across London relate strongly to health inequalities in the Capital. Cycling likewise offers opportunities for contributing to the health of Londoners.

1.4.2 Part of Health Impact Assessment (HIA) involves considering a plan's impacts on the overall health of the population as a whole, and part focuses on identifying and managing health inequalities (often linked with deprivation). The IIA will consider how the EMALP will impact both the health and wellbeing of London's population and health inequalities in London. Indicators will be selected to reflect existing knowledge and understanding of affordable housing and cycling as determinants of health as part of the topic-based assessment. Many determinants of health straddle other SA topics such as access to open space, good air and water quality, being employed and living in good quality housing.

1.4.3 Considerable guidance on HIA is available including: Department of Health screening questions for HIA<sup>3</sup>; draft guidance on health and SEA<sup>4</sup>; information on healthy communities<sup>5</sup>; and an 'HIA Gateway' run by the Association of Public Health Authorities<sup>6</sup>.

## 1.5 Community Safety Impact Assessment

1.5.1 The Mayor identifies community safety as a cross-cutting priority. Section 17 of the Crime and Disorder Act 1998 and the Police and Justice Act 2006 place a duty on the Mayor to prevent crime and disorder, substance misuse, anti social behaviour and behaviour which adversely affects the environment. Community safety is defined by the Home Office as:

<sup>3</sup> [http://www.dh.gov.uk/en/Publicationsandstatistics/Legislation/Healthassessment/DH\\_4093617](http://www.dh.gov.uk/en/Publicationsandstatistics/Legislation/Healthassessment/DH_4093617)

<sup>4</sup> Williams, C. & Fisher., P. (eds) (2007) Draft Guidance on Health in Strategic Environmental Assessment. Consultation document. London: Department of Health.

<sup>5</sup> <http://www.idea.gov.uk/idk/core/page.do?pagelId=77225>

<sup>6</sup> [http://www.apho.org.uk/default.aspx?QN=P\\_HIA](http://www.apho.org.uk/default.aspx?QN=P_HIA)

*'an aspect of 'quality of life' in which people, individually and collectively, are protected as far as possible from hazards or threats that result from the criminal or anti-social behaviour of others, and are equipped or helped to cope with those they do experience'*

*"It should enable them to pursue, and obtain fullest benefits from, their social and economic lives without fear or hindrance from crime and disorder".*

- 1.5.2 The CSIA will be undertaken in accordance with GLA guidance and best practice used by London boroughs. Relevant indicators of community safety will be used for the assessment.

## **1.6 The story so far**

- 1.6.1 The Draft IIA Scoping Report was prepared by the Mayor in October 2011, building on the IIA for the current London Plan. The Scoping Report sets out the proposed approach for carrying out the IIA of the EMALP 2011 and the scope of the assessment. It included:

- an overview of the proposed EMALP;
- an outline of the proposed approach to carrying out the IIA;
- a review of the plans, programmes and strategies relevant to the EMALP;
- a summary of baseline information and identification of key issues;
- proposed objectives and the assessment framework for the IIA; and
- details of the next steps in the process.

- 1.6.2 The Draft IIA Scoping Report was made available on the GLA website with the draft alterations as part of the Assembly and function bodies consultation and comments were sought during the period of 06 November to 20 December 2011. The document was sent to the statutory consultees (Natural England, the Environment Agency and English Heritage) and other partners with a potential interest in commenting on the document.

- 1.6.3 URS was also engaged to provide critical friend review of the draft IIA Scoping Report. This review was undertaken to establish the extent to which the legal steps set out in the SEA Directive were satisfied. We also reviewed the Draft IIA Scoping Report in respect to its compliance with the Equality Act 2010 and associated guidance on EqIA; as well as guidance and best practice on conducting HIA and CSIA.

- 1.6.4 All feedback received during the consultation period was considered and reflected in the IIA Scoping Report as appropriate.

## **1.7 This Report**

- 1.7.1 This IIA Report is structured as follows:

- Chapter 2 sets out the approach to undertaking the assessment;
- Chapter 3 introduces the EMALP;
- Chapters 4 sets out the appraisal for alterations to affordable housing

policies;

- Chapter 5 sets out the appraisal for alterations to hazardous substances and installations policy;
- Chapter 6 sets out the appraisal for alterations to policies on cycle parking standards;
- Chapter 7 identifies the main findings of the IIA;
- Chapter 8 identifies next steps; and
- Appendix One details the appraisal of alternative options considered.

## **2 IIA METHODOLOGY**

### **2.1 SA / SEA incorporating HIA and CSIA**

- 2.1.1 The methodology adopted for undertaking the IIA is based on a ‘whole plan’ approach. This means that instead of appraising the individual components of the plan against a number of sustainability objectives, the effects of the plan as a whole are appraised and evaluated against a range of topics (including corresponding objectives). The topics for appraisal of alterations to affordable housing policies and to cycle parking standards were identified in the Scoping Report and subject to consultation. The topics for appraisal of alterations to policy on Hazardous Installations were identified in an addendum to the Scoping report. These have not been subject to consultation as this proposed alteration was brought forward later than the others. (see Table 2-1).
- 2.1.2 The IIA topics including corresponding objectives that were developed from a number of key sources including:
- the SEA Directive;
  - review of relevant plans, programmes and strategies;
  - identification of key sustainability issues;
  - consultation with stakeholders (see below);
  - IIAs of other Mayoral strategies including the London Housing Strategy (LHS); and
  - relevant sustainable development frameworks.
- 2.1.3 These topics and objectives were developed for the London Plan 2011 IIA, which this IIA builds upon. The selected topics and objectives effectively form the ‘SA framework’ against which the plan is systematically appraised. Table 2-1 provides a summary of the topics and objectives used in this assessment, identifying the sustainability topics against which the alterations should be appraised.

**Table 2-1: Summary of IIA topics and objectives**

Sustainability Topic	Objective	Is appraisal of alterations needed against this topic? Yes or No.		
		Affordable Housing	Hazardous Substances and Installations	Cycle Parking Standards
Regeneration and Land Use	To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.	Yes	Yes	No
Health and Wellbeing	To maximise the health and wellbeing of the population and reduce inequalities in health.	Yes	Yes	Yes
Equality and diversity	To ensure equitable outcomes for all communities, particularly those most at risk of experiencing discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings Londoners together.	Yes	Yes	Yes
Housing	To ensure that all Londoners have access to good quality, well-located affordable housing.	Yes	Yes	No
Employment	To offer everyone the opportunity for rewarding, well-located and satisfying employment.	Yes	Yes	Yes
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 minimise unsustainable resource use.	Yes	Yes	Yes
Climate change mitigation and energy	To ensure London contributes to global climate change mitigation, achieves greater energy efficiency and	No	No	Yes

Sustainability Topic	Objective	Is appraisal of alterations needed against this topic? Yes or No.		
		Affordable Housing	Hazardous Substances and Installations	Cycle Parking Standards
	reduces its reliance on fossil fuels.			
Accessibility and mobility	To maximise the accessibility for all in and around London and increase the proportion of journey made by sustainable transport modes (particularly public transport, walking and cycling).	No	No	Yes
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).	No	No	Yes
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.	Yes	Yes	Yes
Open Space	To protect and enhance natural open space in London	No	Yes	No
Air quality.	To improve London's air quality.	No	No	Yes

2.1.4 Our appraisal for each topic was guided by a series of indicative questions, formulated to provide more detailed guidance for assessors on the aspects that should be considered with regards to identifying likely effects. They are not designed to be read as targets or aims with which to achieve the objective. The objectives and guide questions are listed in Table 2-2.





**Table 2-2: IIA Objectives and Guide Questions**

IIA Objectives	Guide Questions
<p>Regeneration and Land Use: To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities</p>	<p>Will the regeneration have benefits for deprived areas?</p> <p>Will it help to make people feel positive about the area they live in?</p> <p>Will it help to create a sense of place and 'vibrancy'?</p> <p>Will it help reduce the number of vacant and derelict buildings?</p> <p>Will it make the best use of scarce land resources and reuse brownfield sites?</p> <p>Will it minimise impacts of development on the environment?</p> <p>Will it help address contamination, including of land?</p>
<p>Health and Wellbeing: To maximise the health and wellbeing of the population and reduce inequalities in health.</p>	<p>Will it help reduce poverty and the impact of income inequality?</p> <p>Will it help reduce health inequalities?</p> <p>Will it help improve mental and emotional health?</p> <p>Will it improve access to high quality public services (including health facilities)?</p> <p>Will it help reduce the misuse of substances?</p> <p>Will it help people to live an inclusive and active lifestyle?</p>
<p>Equality and Diversity: To ensure equitable outcomes for all communities, particularly those most at risk of experiencing discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings Londoners together.</p>	<p>Will it reduce poverty and social exclusion in those areas and communities most affected?</p> <p>Will it remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination?</p> <p>Will it promote a culture of equality, fairness and respect for people and the environment?</p> <p>Will it promote equality for black and minority ethnic communities, women, women that are pregnant, people with children or caring responsibilities, disabled people, lesbians, gay men, bisexual and transgender people, people that are married or in a civil partnership, older people, young people, children and faith groups?</p> <p>Will it meet the different needs of people who</p>

IIA Objectives	Guide Questions
	<p>share protected characteristics, as listed above?</p> <p>Will it foster good relationships between people who share a protected character, as listed above, and those who do not have that characteristic, including tackling prejudice and promoting understanding?</p> <p>Will it promote adequate accessibility, in particular for older or disabled people?</p> <p>Will it encourage persons in the groups listed above to participate in public life or in any other activity in which participation by such persons is disproportionately low?</p>
<p>Housing: To ensure that all Londoners have access to good quality, well-located affordable housing.</p>	<p>Will it reduce homelessness and overcrowding?</p> <p>Will it reduce the number of unfit homes?</p> <p>Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)?</p> <p>Will it ensure that appropriate social and environmental infrastructure are in place for new residents?</p> <p>Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle?</p> <p>Will it promote lifetime homes?</p> <p>Will it improve overall design quality?</p> <p>Will it increase use of sustainable design and construction principles?</p> <p>Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health?</p> <p>Will it provide housing that encourages a sense of community and enhances the amenity value of the community?</p> <p>Will it ensure homes are well located in relation to flood risk?</p> <p>Will it promote the increased supply of housing?</p>
<p>Employment: To offer everyone the opportunity for rewarding, well-located and</p>	<p>Will it help generate satisfying and rewarding new jobs?</p>

IIA Objectives	Guide Questions
satisfying employment.	<p>Will it help to provide appropriate employment in the most deprived areas and stimulate regeneration?</p> <p>Will it help reduce overall unemployment, particularly long-term unemployment?</p> <p>Will it help to improve learning and the attainment of skills?</p> <p>Will it encourage the development of healthy workplaces?</p> <p>Will it provide employment in accessible locations?</p>
<p>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 minimise unsustainable resource use.</p>	<p>Will it improve sustainable business development?</p> <p>Will it improve the resilience of business and the economy?</p> <p>Will it help to diversify the economy?</p> <p>Will it support and prevent the loss of local businesses?</p> <p>Will it encourage business start-ups and support the growth of businesses?</p> <p>Will it encourage ethical and responsible investment?</p> <p>Will it help reduce levels of deprivation?</p> <p>Will it support the development of green industries and a low carbon economy?</p> <p>Will it support other niche or emerging sectors of the economy?</p> <p>Will it help maintain London as an internationally competitive city?</p> <p>Will it support the infrastructure required by a growing and changing economy?</p>
<p>Climate change mitigation and energy: To ensure London contributes to global climate change mitigation, achieves greater energy efficiency and reduces its reliance on fossil fuels</p>	<p>Will it help minimise emissions of greenhouse gases?</p> <p>Will it help London meet its emission targets?</p> <p>Will it avoid exacerbating the impacts of climate change?</p> <p>Will it increase the proportion of energy both purchased and generated from renewable and low carbon sustainable resources.</p> <p>Will it reduce the demand and need for energy?</p>

IIA Objectives	Guide Questions
<p>Accessibility and mobility: To maximise the accessibility for all in and around London and increase the proportion of journey made by sustainable transport modes (particularly public transport, walking and cycling).</p>	<p>Will it promote and improve energy efficiency?</p> <p>Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</p> <p>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?</p> <p>Will it reduce traffic volumes and traffic congestion?</p> <p>Will it reduce the length of commuting journeys?</p> <p>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)?</p> <p>Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living?</p> <p>Will it improve accessibility to work by public transport, walking and cycling?</p> <p>Will it reduce road traffic accidents?</p> <p>Will it improve physical access to the transport system as well as buildings and spaces?</p>
<p>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).</p>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential, including their settings?</p> <p>Will it conserve and enhance the townscape/cityscape character?</p> <p>Will it promote high quality design and sustainable construction methods?</p> <p>Will it respect visual amenity and the spatial diversity of communities?</p> <p>Will it enhance the quality of the public realm?</p> <p>Will it support and enhance heritage?</p> <p>Will it improve the wider built environment and sense of place?</p> <p>Will it conserve and enhance local character?</p> <p>Will it protect important views across London?</p>
<p>Liveability and Place: To create sustainable, mixed</p>	<p>Will it create and sustain vibrant and diverse communities and encourage increased</p>

IIA Objectives	Guide Questions
use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place	<p>engagement in recreational, leisure and cultural activities?</p> <p>Will it increase the provision of culture, leisure and recreational activities?</p> <p>Will it support the provision of quality, affordable and healthy food?</p> <p>Will it provide opportunities for people to choose an active, fulfilling life?</p> <p>Will it increase the provision of key services, facilities and employment opportunities?</p> <p>Will it positively enhance and promote the perceived sense of place held by the community?</p> <p>Will it protect and enhance the provision of open space?</p> <p>Will it help reduce actual levels of crime and antisocial behaviour?</p> <p>Will it help reduce damage to the physical and natural environment?</p> <p>Will it help reduce the perception of crime in an area?</p> <p>Will it help reduce actual noise levels and disturbances from noise and other nuisance?</p> <p>Will it protect and improve existing quality of life?</p> <p>Will it help reduce the risk of terrorist attack?</p>
Open Space:	<p>Will it protect and enhance areas of open space?</p> <p>Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace?</p> <p>Will it address areas with deficiencies of access to open space?</p> <p>Will it promote an appropriate range and type of open space uses?</p> <p>Will it increase Londoners access for recreational purposes?</p> <p>Will it promote urban greening?</p> <p>Will it promote and support the function of the Blue Ribbon Network?</p>
Air quality: To improve London's air quality	Will it improve air quality?

IIA Objectives	Guide Questions
	<p>Will it reduce emissions of greenhouse gases?</p> <p>Will it help to reduce emissions of PM10 and NO2?</p> <p>Will it reduce emissions of ozone depleting substances?</p> <p>Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2010)?</p>

- 2.1.5 We also addressed the following questions to appraise the public consultation version of the early minor alterations to the London Plan:
- What will be the situation with the Plan Alterations? (Appraisal findings);
  - How can we mitigate / enhance effects? (URS's recommendations for mitigation and/or enhancement to the Mayor); and
  - How can we best monitor the EMALPs' impacts? (Monitoring).
- 2.1.6 These questions correspond to the key requirements of the SEA Directive, therefore clearly demonstrating compliance with the Directive's requirements – see Table 2-3.
- 2.1.7 In particular, the SEA Directive requires the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This IIA Report incorporates the information that must be included in the Environmental Report. SEA requirements, associated key questions and how this IIA Report conforms to the Directive are shown in Table 2-3.

**Table 2-3: Meeting the Requirements of the SEA Directive**

Questions for each topic	Key requirement of the SEA Directive
What's the Plan trying to achieve? <b>Chapter 3: The Early Minor Alterations to the London Plan</b>	<b>"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"</b> (Annex I(a))
What's the sustainability context? <b>Chapters 4 to 6: Background/policy context</b>	<p>"an outline of the contents, main objectives of the plan or programme and <b>relationship with other relevant plans and programmes</b>" (Annex I(a))</p> <p><b>"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</b> (Annex I(e))</p>
What's the situation now? <b>Chapters 4 to 6: Sustainability baseline and key sustainability issues</b>	<p><b><i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i></b> (Annex 1(b))</p> <p><b>"the environmental characteristics of areas likely to be significantly affected"</b> (Annex I(c))</p> <p><b>"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC"</b> [NB problems relating to European sites are addressed through the HRA] (Annex I(d))</p>
What will be the situation without the plan? <b>Chapters 4 to 6: What would be the situation without the Early Minor Alterations?</b>	<b>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</b> (Annex I(b))
How has the appraisal been undertaken? <b>Chapter 2: Methodology for carrying out the</b>	<b>"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information"</b> (Annex I(h))



Questions for each topic	Key requirement of the SEA Directive
<b>IIA</b>	
What will be the situation with the plan? <b>Chapters 4 to 6: Appraisal findings</b>	<i><b>“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors</b></i> <b>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects”</b> (Annex I(f))
How can we mitigate / enhance effects? (our recommendations) <b>Chapters 4 to 6: Recommendations for mitigation and/or enhancement</b>	<b>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”</b> (Annex I(g))
What should be the focus of monitoring? <b>Chapters 4 to 6: Monitoring</b>	<b>“a description of the measures envisaged concerning monitoring...”</b> (Annex I(i))
What was the GLA’s response to our recommendations? <b>Forthcoming</b>	<b>“The environmental report...shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure”</b> (Article 8)

#### 2.1.8

This IIA has been undertaken on the policies set out in the public consultation version of the EMALP using the IIA framework. The appraisal itself is a qualitative exercise based on the professional judgement of URS drawing on available evidence. URS also undertook an IIA of the revised London Housing Strategy (RLHS). Much of the evidence collated for the IIA of the RLHS was relevant to the IIA of the EMALP. Sources of evidence referenced include:

- the evidence base for the London Plan;
- the EMALP IIA Scoping Report and its addendum;
- IIA of the London Plan (Entec UK Ltd, 2009);

- data from the London Datastore website and the GLA website; data from London's poverty profile website (Trust for London/New Policy Institute);
  - stakeholder feedback received by the Mayor on the Early Alterations; and
  - reports and evidence presented or signposted to us by the stakeholders who attended a meeting hosted by the GLA on 18 November 2011.
- 2.1.9 The appraisal considered likely significant effects of the early minor alterations, not all possible effects, with a clear and reasoned justification provided.
- 2.1.10 When commenting on the effects towards achieving objectives, consideration was given to the following impact dimensions:
- Spatial - the geographic occurrence of the effect. Generally this will be London wide, but specific areas (e.g., Inner London, Outer London) are referenced where appropriate;
  - Timescales – For the purposes of assessment, the short term is considered to be effects that occur within the first five years of adoption of the Plan. For the affordable housing policies, the short term is considered to be effects that occur within the timeframe of the existing investment round (2011 – 2015). The medium term may be taken to be effects occurring between five and 15 years following adoption of the Plan while the long term may be those effects that occur beyond 15 years and which may arise beyond the timescale of the current London Plan (up to 2031);
  - Magnitude – consideration will be given to the direction of the effect (positive / negative / uncertain) and the extent to which it may contribute towards achieving the objective; and
  - In-combination nature of effects.
- 2.2 EqlA**
- 2.2.1 The EqlA systematically identified ways in which the EMALP and their implementation might give rise to potential unlawful discrimination effects, as well as to potential impacts in relation to advancing equality of opportunity and the fostering of good relations.
- 2.2.2 The EqlA referred to evidence concerning types of inequality or disadvantage, as experienced amongst groups of people sharing protected characteristics, which are relevant to proposed EMALP policies.
- 2.2.3 The review of evidence considered:
- evidence indicating how many people sharing protected characteristics could be potentially effected;
  - evidence indicating the particular vulnerability of people sharing protected characteristics to possible effects;
  - evidence indicating a relationship between shared protected characteristic and disproportionate risks of disadvantage (e.g. low income households) amongst groups; and

- increased vulnerability due to intersecting protected characteristics possessed by individuals.

- 2.2.4 This evidence was then used to assess the impact of the proposed policies on each of the protected groups and identify any opportunities to promote equality and good relations. Actions to eliminate or mitigate risks were also identified as appropriate.
- 2.2.5 EqlA requires adequate consultation and engagement with different stakeholders. The EqlA drew on evidence gained through consultation with a range of GLA in-house stakeholders and invited external stakeholders, including representatives of cycle campaign groups. A member of the GLAs' Diversity and Social Policy team provided input to the EqlA.
- 2.2.6 The EqlA findings have been integrated within the three assessment chapters.
- 2.2.7 The EqlA report will also be available as a stand-alone report. This will assist the Mayor and the GLA in demonstrating it has fulfilled its Section 149 duties in relation to the EMALP.

### **3 THE EARLY MINOR ALTERATIONS TO THE LONDON PLAN**

#### **3.1 Introduction**

- 3.1.1 The GLA Act 1999 (as amended) gives the Mayor of London the power and responsibility to produce a Spatial Development Strategy for London (which is generally known as the London Plan) and to keep it under review and alter or replace it as necessary.
- 3.1.2 The latest London Plan underwent an Examination in Public between July and December 2010 and was published on 22 July 2011. During the later stages in the process to adopt this Plan, the Government announced some important proposals to change the planning system and land use policies including introducing a new 'Affordable Rent product'. It was not possible to include these changes within the Plan.

#### **3.2 Why are these early minor alterations needed?**

- 3.2.1 The London Plan was published in July 2011. The period of its preparation included the May 2010 General Election, and changes were made to the draft Plan as the process went forward to ensure that account was taken of policy changes announced by the Coalition Government. It was not possible, however, to deal fully with all of the changes, particularly those made by the Government to change the definition of "affordable housing" for planning purposes, bringing in a new 'Affordable Rent product' alongside social rent and intermediate housing.
- 3.2.2 This change was signalled in the London Plan (see paragraph 3.63), but on legal advice the Mayor did not consider it was appropriate to change the affordable housing policies to fully reflect it. Accordingly, he published the Plan on the basis that he would bring forward supplementary guidance explaining how its policies should be applied in the light of changing Government policy, pending a formal alteration to bring the Plan fully up-to-date. It was on this basis that the Secretary of State agreed that publication should proceed.
- 3.2.3 The other development it was not possible to reflect in the London Plan was the publication by the Government of the draft National Planning Policy Framework (NPPF). This was published for consultation in July 2011, with comments sought by 17 October 2011. The Government intends that the NPPF will replace the suite of Planning Policy Statements (PPSs) and Guidance Notes (PGNs), replacing around a thousand pages of guidance across forty documents with a single document of 50-60 pages. The publication of the NPPF will therefore make the references to Government guidance in the London Plan out of date. While the general policy approach in the draft Framework is consistent with that in the London Plan, there may also be doubts about the respective status of the two documents after the NPPF is published.

3.2.4 The London Plan also signalled the Mayor's intention to commission Transport for London to review cycle parking standards (paragraph 6A.11). Considerable progress has been made on this review, and it is possible to bring forward some improvements to the standards informed by its initial conclusions.

3.2.5 The opportunity is being taken, as part of the early minor alterations to the London Plan, to make provision to publish guidance on developments potentially affected by hazardous installations. This is in response to a degree of uncertainty expressed by the boroughs and developers about the process regarding hazardous installations and the relative roles of the various organisations involved. This proposed alteration is to ensure appropriate weight can be given to any supplementary guidance in line with Circular 1/2008 which states planning guidance published by the Mayor should be based on published policy that has undergone Examination.

### **3.3 The process for introducing Early Minor Alterations to the London Plan**

3.3.1 The Mayor considers that these alterations are "minor" for the purposes of regulation 7 (7) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. This means that the period of full public consultation that takes place following this initial round with the London Assembly and GLA functional bodies should be a period of not less than six weeks, rather than twelve. He takes this view given that alterations are proposed to only five policies of the 122 in the London Plan. Those dealing with the Government's new Affordable Rent product were clearly highlighted in the published London Plan, while other policies merely involve moving supporting text into formal policy.

3.3.2 Under the GLA Act 1999 (as amended), the Mayor is required to undertake two rounds of consultation on the statutory plan, first, with the London Assembly and functional bodies (Transport for London, London Development Agency, Metropolitan Police Authority, London Fire and Emergency Planning Authority) and, second, with the public. An initial formal document was submitted to the Assembly and the GLA functional bodies in November 2011. This version has been prepared for consultation with the public in February 2012. The final version will be subject to an Examination in Public, with adoption likely in late 2012/late 2013.

3.3.3 In preparing and making alterations to the London Plan, the Mayor has a legal responsibility to have regard, among other matters, to the effect it would have on equalities, the health of people in London, health inequalities in London, climate change and its consequences, and the achievement of sustainable development in London. The undertaking of the IIA for the revised Plan will enable these responsibilities to be discharged efficiently and cost-effectively.

### **3.4 Early Minor Alterations to the London Plan**

3.4.1 The EMALP seek to:

- Add a new paragraph to the Overview and Introduction chapter of the Plan dealing with the NPPF giving advice about the status of the Plan following

publication of the Framework and explaining that the Mayor will make any necessary changes to the Plan once the final NPPF is published.

- Change London Plan policies 3.8-3.13 dealing with affordable housing. In particular, an alteration to the definition of 'affordable housing' in Policy 3.10 is proposed to include the Government's new 'affordable rent' product. Changes are proposed to Policy 3.11 with an updated approach to setting affordable housing targets in Local Development Frameworks. Alterations are also proposed to Policy 3.12 to give a clear preference to on-site provision, with off-site next and financial payments in lieu third, to give additional weight to the text in paragraph 3.74.
- Include additional wording to Policy 5.22 Hazardous substances and installations to make provision for the preparation of supplementary guidance on this matter.
- Change parts of Chapter 6 to reflect updated cycle parking standards, following a review carried out by Transport for London.
- Delete the London Plan Glossary definition of 'Air Quality Neutral', which has been suggested to be unhelpful. No change to the policy on air quality (7.14) is proposed.

### **3.5 Consideration of the need for full appraisal of the EMALP**

- 3.5.1 An appraisal of impacts is required for alterations which involve substantive changes to existing policies.

**Table 3-1: Which of the proposed alterations require IIA appraisal?**

Policy to be changed	Proposed change	Effect	Substantive change requiring IIA appraisal?
<b>Overview and introduction</b>	Insert paragraphs on the status of the London Plan following the consultation of the draft National Planning Policy Framework.	Provides clarity on the status of the London Plan in relation to changing national policy. No change to the overall policies in the Plan.	No
<b>Policy 3.8 Housing choice</b>	Insertions into paragraphs to note Affordable Rent to meet same need as social rent, and to include references to affordable rent.	Adds and replaces references to Affordable Rent as part of affordable housing and notes the Government's intention that it meets the same need as social rent. No change to the overall policy, but provides consistency with affordable housing policies.	No
<b>Policy 3.9 Mixed &amp; balanced communities</b>	Insertion of Affordable Rent into supporting text.	Notes Affordable Rent has a role to help achieve mixed and balanced communities. No change to the overall policy, but provides consistency with affordable housing policies.	No
<b>Policy 3.10 Definition of affordable housing</b>	Policy change to include Affordable Rent as part of affordable housing.  In the supporting text includes a definition for Affordable Rent and updates definition of social rent and intermediate rent, including household income range.	Provides policy backing to Affordable Rent as affordable housing.  Provides details and updates definitions for each element of affordable housing.	Yes
<b>Policy 3.11 Affordable housing targets</b>	Policy change to include Affordable Rent as social rent and to note priority to maximise provision of affordable housing. Delete reference to Housing SPG in relation to affordable rent.	Provides policy backing for Affordable Rent as part of the 60% provision of overall affordable housing provision and reflects role of Mayor's Housing Strategy to deliver affordable housing in London.	Yes



Policy to be changed	Proposed change	Effect	Substantive change requiring IIA appraisal?
<b>Policy 3.12 Negotiating affordable housing</b>	<p>Policy change to state the affordable housing priority is for family housing.</p> <p>Policy change to state how affordable housing should be delivered.</p> <p>Additional support text outlines how the policy should be applied.</p>	<p>Policy change gives more emphasis to provide affordable family housing.</p> <p>Policy change gives more weight to how affordable housing should be delivered.</p>	Yes
<b>Policy 5.22 Hazardous substances and installations</b>	Policy change to state the Mayor may produce guidance.	No change to the effect of overall policy but would give weight to any supplementary planning guidance produced in accordance with paragraph 2.2 of Circular 1/2008.	Yes
<b>Policy 6.9 Cycling</b>	<p>Policy - Table 6.3 updated to increase cycling parking required in office developments, student housing and others.</p> <p>Supporting text - clarification on how cycle parking is to be provided</p>	Requires more cycle parking spaces for some developments.	Yes
<b>Parking Addendum</b>	Additional supporting text to reflect the Mayor's intentions with regards to car parking following statements by the Government. No change to policy.	Provides additional advice, but involves no change to policy.	Yes
<b>Glossary</b>	Delete the definition of 'air quality neutral'	No change to policy.	No

### 3.6 Relationship with other Mayoral strategies

- 3.6.1 The proposed early minor alterations to the London Plan regarding affordable housing will affect the LHS. A revised LHS is currently being developed, which reflects these policy changes.



- 3.6.2 The cycle parking standards will contribute towards achieving targets in other transport and cycle strategies and action plans, including the Mayor's Transport Strategy, Cycling Revolution London and Cycle Safety Action Plan.
- 3.6.3 The proposed EMALP include reference to possible new supplementary planning guidance on hazardous installations. The Mayor is in discussions with the HSE regarding the development of this new guidance.
- 3.6.4 The Mayor also has a number of other statutory and non-statutory strategies relating to the environment, health inequalities, climate change and air quality. The EMALP will potentially contribute towards achieving the objectives within these strategies, rather than replace them.
- 3.7 How the IIA has informed the Plan at each stage and how the GLA has taken this into account**
- 3.7.1 This IIA of the EMALP builds on the IIA for the London Plan, drawing on the existing London Plan evidence base to inform the appraisal of the proposed alterations.
- 3.7.2 The development of the EMALP has included the following:
- A review of the London Plan policies and options appraisals for the proposed policies and their alternatives;
  - A review of evidence from a range of sources. These include the evidence base for the recently published London Plan, updated evidence from TfL and other evidence which has informed specific policy areas;
  - Production of a Scoping Report, which was reviewed by attendees at a stakeholder workshop for invited external and GLA stakeholders; and by URS;
  - Revisions to the Scoping Report in response to the stakeholder workshop and a 'critical friend' review. This review was undertaken by URS to ensure robustness and legal conformity. Subsequent changes to the scoping report included:
    - Clearer reference to the national and international context in terms of sustainability indicators;
    - Additional consideration of the likely future situation in London without the EMALP;
    - Updating of the evidence base in relation to objectives on Regeneration and Land-Use; Health and Well-being; Equalities and Diversity; Housing; Built and Historic Environment; Liveability and Place; and Air Quality;
    - Verification and some updating of the evidence base on cycling rates in London; and
    - Consideration of the implications of baseline evidence gaps for the appraisal stage of the IIA.
  - As required by legislation, a draft of the EMALP was published for consultation with the London Assembly and functional bodies. It was also made available to other external stakeholders at this stage. The consultation ran from 06 November 2011 to 20 December 2011. This consultation period included the specific 5 week consultation required with the SEA statutory consultees (English Heritage, Natural England and the

Environment Agency) to enable them provide input into the scope of the SA (incorporating SEA) element of the IIA. A copy of the IIA Scoping Report was published alongside the draft.

3.7.3 Responses were received from:

- statutory consultees (the Environment Agency, and English Heritage). These responses were on the IIA scoping report only;
- functional bodies - Transport for London (TfL);
- City of London Corporation and London Boroughs (responses to date received from City of London Corporation; LB Bromley; LB Southwark; LB Tower Hamlets; LB Wandsworth; LB Westminster); and
- other stakeholder organisations (responses to date received from Just Space Network; London Cycling Campaign; London Tenants Federation; National Housing Federation; South East London Partnership; Town and Country Planning Association; and University College London).

**3.8 Consideration of alternatives**

3.8.1 SA requires options and alternatives to the proposed policy approaches need to be identified during the development of the proposed policies, including alterations.

3.8.2 The consideration of alternatives was undertaken by the Mayor. The IIA Scoping Report provided an early commentary on the options and alternatives for each of the proposed early minor alterations to the London Plan, addressing the question of 'What are the potential implications of not introducing this policy?'. Further, more detailed assessment was undertaken to appraise the identified alternatives against the IIA framework.

3.8.3 The Mayor identified two principles underlying his approach to considering potential options to affordable housing policies.

- First, to follow the Government in treating affordable rent and social rent affordable housing alongside each other as they are intended to address the same housing needs, and because in practice there will be similarities between the two types of provision.
- Second, that, as required by Planning Policy Statement (PPS) 3, planning policy needs to be informed by an appreciation of the scale and scope of the funding likely to be made available for affordable housing by national government. For the 2011-15 programme, it is clear that "Affordable Rent will form the principal element of the new supply offer" and that "Social rent provision will only be supported in limited circumstances". The Mayor considers that preferred proposed approaches retain sufficient flexibility to enable the policy to respond to any changes made for future programmes.

3.8.4 Possible alternatives to the proposed change to 'Policy 3.10 Definition of Affordable Housing' were identified as:

- not to introduce the definition of Affordable Rent into the London Plan; or

- introducing a specific definition of affordable housing.
- 3.8.5 Both these alternatives were considered likely to leave London's position ambiguous in relation to national policy, potentially delaying approvals and therefore delaying and reducing delivery of new homes, including affordable homes. These options were identified as performing negatively against regeneration and landuse; health and wellbeing; equalities; housing; employment; stable economy; and liveability and place objectives. For other sustainability objectives, they were judged likely to have no significant effect.
- 3.8.6 Possible alternatives to the proposed changes to 'Policy 3.11 Affordable housing targets' were identified as:
- not to include Affordable Rent as part of 60% target for overall proportion of affordable housing;
  - to introduce a different split for delivery of social rent, Affordable Rent and intermediate affordable housing;
  - to set separate targets for each of social and affordable rented housing;
  - not to include a reference to the Mayor's housing strategy; and
  - not to include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources.
- 3.8.7 The option not to include Affordable Rent as part of 60% target for overall proportion of affordable housing was identified as likely to create uncertainty, delaying the delivery of affordable housing. It was considered likely to undermine the ability to reach the London Plan housing target as well as not maximise the delivery of affordable housing. As a consequence, this alternative was identified as performing negatively against regeneration and landuse; health and wellbeing; equalities; housing; employment; stable economy; and liveability and place objectives. It was judged unlikely to have significant effects for other sustainability objectives.
- 3.8.8 The options to introduce a different split for delivery or to set separate targets for each of social and affordable rented housing were both identified as not enabling sufficient regard to be given to current and likely future funding arrangements and therefore likely to create uncertainty and delay regeneration and the delivery of housing due to a lack of funding for the affordable element. These alternatives were identified as likely to perform negatively against regeneration and landuse; health and wellbeing; equalities; housing; employment; stable economy; and liveability and place objectives. They were judged unlikely to have significant effects for other sustainability objectives.
- 3.8.9 The alternative option not to include references to the Mayor's Housing Strategy was identified as likely to reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, with negative effects for regeneration and land-use; health and well-being, equalities, housing, employment, stable economy; and liveability and place.

- 3.8.10 The alternative option not to include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources was identified as likely to limit the overall amount of affordable housing delivered across London, with negative effects for regeneration and land-use; health and well-being, equalities, housing, employment, stable economy; and liveability and place.
- 3.8.11 The alternative option to proposed changes to 'Policy 3.12A – Negotiating affordable housing' was identified as not introducing a priority for family housing. This was identified as likely to result in reduced delivery of family-sized affordable housing, with negative effects for regeneration and land-use, health and well-being, equalities, housing and liveability and place objectives.
- 3.8.12 Possible alternatives to the proposed change to 'Policy 3.2C – Negotiating affordable housing' were identified as:
- not to introduce the criteria into the policy; or
  - setting out a different order of priorities or not covering some types of delivery such as funding agreed programmes for the provision of affordable homes.
- 3.8.13 The option of not introducing the criteria was identified as likely to give rise to uncertainty. The lack of clarity for boroughs and developers was identified as likely to limit investment in affordable housing and regeneration schemes, with negative effects for regeneration and land-use, health and well-being, equalities, housing, and liveability and place objectives.
- 3.8.14 The option of setting out a different order of priorities was considered likely to result in the delivery of less additional affordable housing or of restricting investment in social and physical infrastructure of regeneration schemes. It could also limit the variety of tenure on a site. It was identified to have potential negative effects for regeneration and land-use, health and well-being, equalities, housing, and liveability and place objectives.
- 3.8.15 Both these alternatives were considered likely to leave London's position ambiguous in relation to national policy, potentially delaying approvals and therefore delaying and reducing delivery of new homes, including affordable homes. These options were identified as performing negatively against regeneration and land-use; health and wellbeing; equalities; housing; employment; stable economy; and liveability and place objectives. For other sustainability objectives, they were judged likely to have no significant effect.
- 3.8.16 A possible alternative to the proposed changes to 'Policy 5.22 Hazardous substances and installations' was identified as:
- not introducing a link to a potential SPG.
- 3.8.17 This was identified as limiting the weight of any SPG and limiting the confidence of developers and decision-makers to bring forward schemes near hazardous installations. This was considered likely to have potential negative effects for regeneration and land-use, housing, employment, stable economy, liveability and place and open space objectives.

- 3.8.18 Possible alternatives to the proposed changes to 'Policy 6.9 Cycling' were identified as:
- not to update the standards;
  - update all the cycle parking standards; and
  - have lower or higher standards for cycle parking.
- 3.8.19 The option not to update the standards was judged likely to fail to encourage additional cycling or to improve provision of off-street parking. It was considered likely to have negative impacts for health and well-being, equalities, stable economy, climate change mitigation and energy and accessibility and mobility.
- 3.8.20 The option to update all the cycle parking standards was identified as potentially likely to encourage increased cycling, with consequent positive effects for health and well-being, equalities, stable economy, climate change and energy, accessibility and mobility, built and historic environment, liveability and place, and air quality objectives. However, due to inadequate evidence being currently available as the basis for updating all the standards, this was identified not to be a viable option at this time.
- 3.8.21 The options to either have either lower or higher standards for cycle parking were judged to have either potential negative effects in the case of lower standards or potential positive effects in the case of higher standards, across a range of sustainability objectives (health and well-being, equalities, stable economy, climate change mitigation and energy, accessibility and mobility, built and historic environment, liveability and place, and air quality). However, both options were considered not to be sound by the GLA, as they would not be supported by the evidence currently available.
- 3.8.22 Table 8-1 in Appendix 1 outlines the preferred options and their background as well as the alternative options. It records the detailed findings of the appraisal of each of the alternative options against the IIA framework.
- 3.8.23 The preparation of the early minor alterations involved research by Transport for London (TfL) as well as initial consideration by the GLA of reasonable alternative approaches to achieving objectives. These alternatives refer mainly to strategic policy options, whilst the cycle parking standards also have spatial implications.

### **3.9 Affordable Rent Consultation and stakeholder engagement**

- 3.9.1 Consultation and stakeholder engagement are fundamental to the IIA process and reflect the principle that the development of plans is better where it is transparent, inclusive and uses information that has been subject to public scrutiny. The IIA process aims to ensure that the key stakeholders, those parties who could be affected and the wider public have the opportunity to present their views on the findings of the assessment. At the scoping stage, consultation responses were sought from statutory consultees identified in the SEA regulations, as well as the London Assembly and functional bodies (Transport for London, London Development Agency, Metropolitan Police Authority, London Fire and Emergency Planning Authority)‘.

#### **Consultation on this IIA**

- 3.9.2 This IIA Report is being issued for public consultation alongside the draft Early Minor Alterations to the London Plan (EMALP). The consultation period will run for a minimum of six weeks from Monday 6<sup>th</sup> February to Friday 23<sup>rd</sup> March 2012.

## **4 APPRAISAL OF ALTERATIONS TO AFFORDABLE HOUSING POLICIES**

### **4.1 Summary of Alterations to Policies within Chapter 3 of the London Plan**

4.1.1 Proposed alterations to policies on affordable housing within Chapter 3 of the London Plan may be summarised as:

- introduction of Affordable Rent as part of affordable housing definition;
- affordable rent forms part of the 60 per cent target of overall provision of affordable housing;
- notes the need to make best use of resources;
- priority for family housing; and
- clarifies how affordable housing should be provided, in order of preference – on-site, off-site, exceptionally payment in lieu for identified projects/schemes.

4.1.2 Associated proposed wording changes within the text of chapter 3 of the London Plan may be summarised as:

- affordable rent to meet the same need as social rent;
- confirms need for Affordable Rent family housing;
- new Affordable Rent product should be applied to achieve mixed and balanced communities;
- introduces Government's definition of Affordable Rent;
- updates definition of social rent and intermediate housing; and
- notes delivery in accordance with local demand.

### **4.2 Baseline summary**

4.2.1 The Scoping Report and addendum provide a more detailed baseline that informed this appraisal. This summary highlights some headline figures only to provide a context for important appraisal findings.

4.2.2 Population growth is an important consideration for the London Plan and has a major influence on policy development. London accounts for 41 percent of natural population growth in England and Wales (2007 figures). There is still an overall net outflow of people from London to the rest of the UK, though this has somewhat slowed during the economic downturn. More international migrants continue to come to London than leave, but the overall number of international migrants moving to London continues to fall from its peak in 2004/05<sup>7</sup>. Unless there is a reversal of current population growth trends related to natural growth and migration, London will have to plan for continued population growth to 2031.

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<sup>7</sup> *ibid*



- 4.2.3 Black, Asian and other minority ethnic communities are expected to grow strongly as a result of natural growth and continued in-migration from overseas. Between 2007 and 2031, six London boroughs are likely to have more than half their population coming from these groups, with Harrow, Redbridge, Tower Hamlets, Ealing, Hounslow and Croydon joining Brent and Newham which already had such a majority in 2001.
- 4.2.4 The highest average life expectancies in London are in Kensington and Chelsea, where expectancy for men is 83.1 years and for women is 87.2 years. The boroughs with the lowest life expectancy in London are Islington for males (74.9 years) and Newham for females (79.4 years).

### **Poverty and inequality**

- 4.2.5 The level of poverty in London, particularly child poverty, is a major long-term cause of health inequalities across the city. Levels of poverty and deprivation correlate closely with levels of poor health. People's employment status and the nature of their work also have a direct bearing on their physical and mental health, and even on their life expectancy. Across London average life expectancies vary, reflecting different concentrations of deprivation between boroughs.
- 4.2.6 Londoners' self-reported health is slightly better than the national average for England. However, there are significant health inequalities within London. Areas such as Tower Hamlets, Hackney and Newham report high rates of poor health. Self-reported not good health varies widely by ethnicity, with higher rates of self-reported not good health amongst Asian, British, Bangladeshi and Pakistani ethnic groups.
- 4.2.7 London's economy has generally been successful over the past twenty years (see next section), however, there is evidence that over this period the UK has become increasingly unequal, with a steepening income gradient between the highest and lowest earners. After housing-cost poverty rates are particularly marked in London, by comparison with national rates.



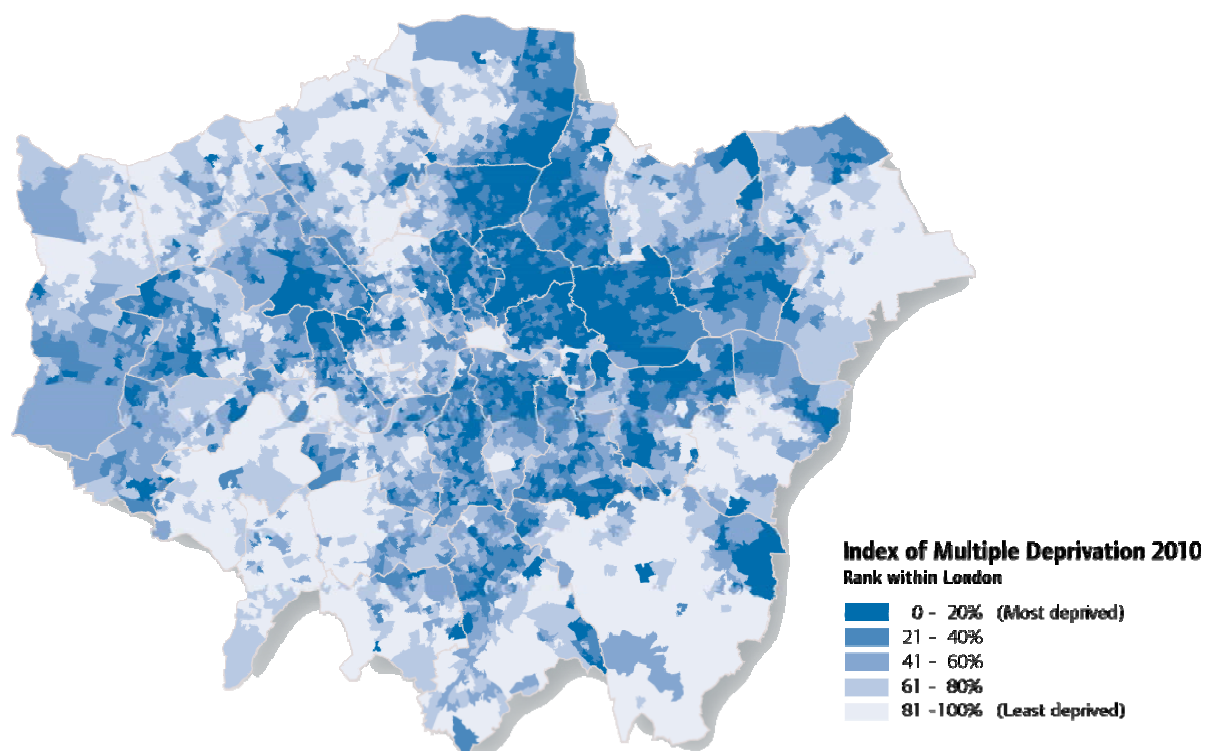
**Figure 4-1: London After Housing Costs Poverty Rates, reproduced from the London Poverty Profile 2011<sup>8</sup>**



- 4.2.8 As a result, London is an increasingly polarised city. Deprivation is concentrated among Black, Asian and ethnic minority and disabled Londoners.
- 4.2.9 The latest (2010) data shows continued trends of geographical polarisation of deprivation across London, with inner and eastern boroughs suffering particularly high rates of deprivation – see Map 1.

<sup>8</sup> <http://www.londonpovertyprofile.org.uk/>

## Map 1: Indices of Multiple Deprivation 2010 – London

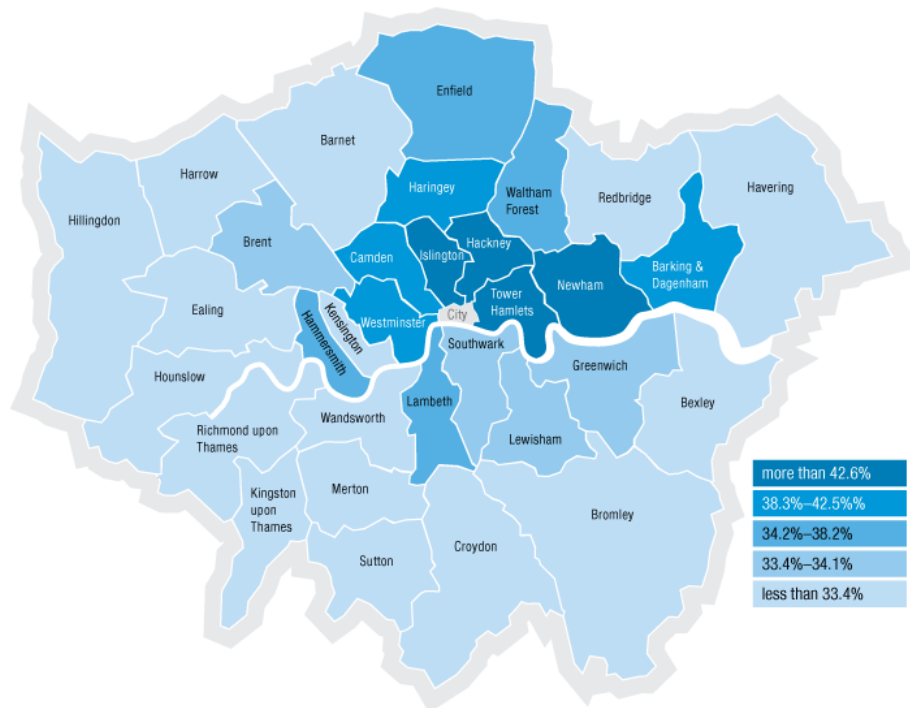


Source: Department for Communities and Local Government, Indices of Deprivation 2010  
ONS Super Output Area Boundaries. © Crown Copyright. All rights reserved. (LA100032216) GLA 2011

- 4.2.10 Poverty rates are particularly marked amongst certain groups of Londoners. Five out of six lone parents do not have a weekly income sufficient for an acceptable standard of living. Single pensioners, people in some ethnic groups (particularly the Pakistani and Bangladeshi populations) and disabled people are also amongst those groups of Londoners most likely to live in households with a weekly income insufficient for an acceptable standard of living<sup>9</sup>.
- 4.2.11 The child poverty rate in London has declined slightly over the last few years, but at 38 per cent after housing costs in 2007/10 (three year average) it was still considerably higher than the UK average of 30 per cent. On this measure, London continues to be the region with the highest rate of child poverty, with considerable variation in rates between boroughs – see Map 2.

<sup>9</sup> London Health Commission, Fair London Healthy Londoners, March 2011

**Map 2: Children living in poverty by Borough**



10

- 4.2.12 Children in certain ethnic groups, children with lone parents (mostly women), disabled children and children living in households with at least one disabled adult are particularly at risk of living in poverty. The highest rates of child poverty in London are amongst children in Pakistani and Bangladeshi households (64 per cent), and Black households (56 per cent). Fifty-six per cent of disabled children live in poverty, as do 54 per cent of children with at least one disabled adult, compared with 34 per cent of children in households with no disabled members<sup>11</sup>.
- 4.2.13 The child poverty rate is much higher amongst those living in social housing (61 per cent) and in private rented housing (57 per cent) than amongst those living in owner occupied housing (20 per cent)<sup>12</sup>.
- 4.2.14 Twenty-one per cent of pensioners in London are living in poverty after housing costs are taken into account, compared with the UK average of 16 per cent. A higher proportion of pensioners from BAME groups live in poverty (27-30 per cent). Pensioners living in social housing or private rented accommodation (both 32 per cent) are twice as likely to be living in poverty as are those in owner-occupied housing (16 per cent)<sup>13</sup>.

<sup>10</sup> [://www.londonpovertyprofile.org.uk/](http://www.londonpovertyprofile.org.uk/)

<sup>11</sup> DWP, Households below Average Income Reports, April 2011

<sup>12</sup> DWP, Households below Average Income Reports, April 2011

<sup>13</sup> DWP, Households below Average Income Reports, April 2011

- 4.2.15 A report by Inclusion London<sup>14</sup> identified that disabled people living in London are more likely to live in rented accommodation with 48.7 per cent of disabled people compared to 41 per cent non-disabled people living in rented accommodation. More than half (53.1 per cent) of disabled people rent their accommodation from the local authority or council whereas non-disabled people are most likely to rent from other individual private landlords (46.3 per cent).
- 4.2.16 The Inclusion London report also noted that:
- the English House Condition Survey 2001 found that 36.5per cent of disabled people lived in 'non-decent housing' compared to 31.4per cent of non-disabled people; and
  - the Mayor's LHS (2010) states disabled people are more than twice as likely as non-disabled people to be living in unsuitable housing.
- 4.2.17 A Habinteg Housing Association and London South Bank University survey (2010) which considered the 'unmet housing need' of wheelchair user households (i.e. only a section of disabled people) found that 78,300 such households had unmet housing needs in England, with an estimated 12,517 of these being in London.

### **Housing demand and delivery**

- 4.2.18 The London Plan identifies London's housing requirements in the capital as 34,900 per year. The GLA report 'Housing: A growing city' shows that 24,300 homes were provided in London in 2009/10 through new development, conversions and changes of use, a drop of 14 per cent per cent from 2008/09. New build housing accounted for 81 per cent of this supply, with a recent decline in residential approvals abating. With capacity for over 170,000 homes in the planning pipeline, London is well placed to tackle future housing needs as it emerges from the recession.
- 4.2.19 Delivery of affordable housing comprising social rented and intermediate housing accounted for 36 to 37 per cent of conventional housing supply in London for the past three years.

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<sup>14</sup> Impact of spending cuts on deaf and disabled people in London. Inclusion London, 2011

**Table 4-1: Net affordable housing completions in London 2007/08 to 2009/10**

	Total net affordable conventional completions				Affordable as per cent of total net conventional completions (all tenures)			
Year	2007/08	2008/09	2009/10	3-year total	2007/08	2008/09	2009/10	3-Year Average
<b>London</b>	<b>10,231</b>	<b>10,763</b>	<b>8,993</b>	<b>29,979</b>	<b>36</b>	<b>37</b>	<b>37</b>	<b>37</b>

Source: London Development Database

**Table 4-2: Residential planning approval trends 2004/05 to 2009/10 (Net dwellings, conventional supply)**

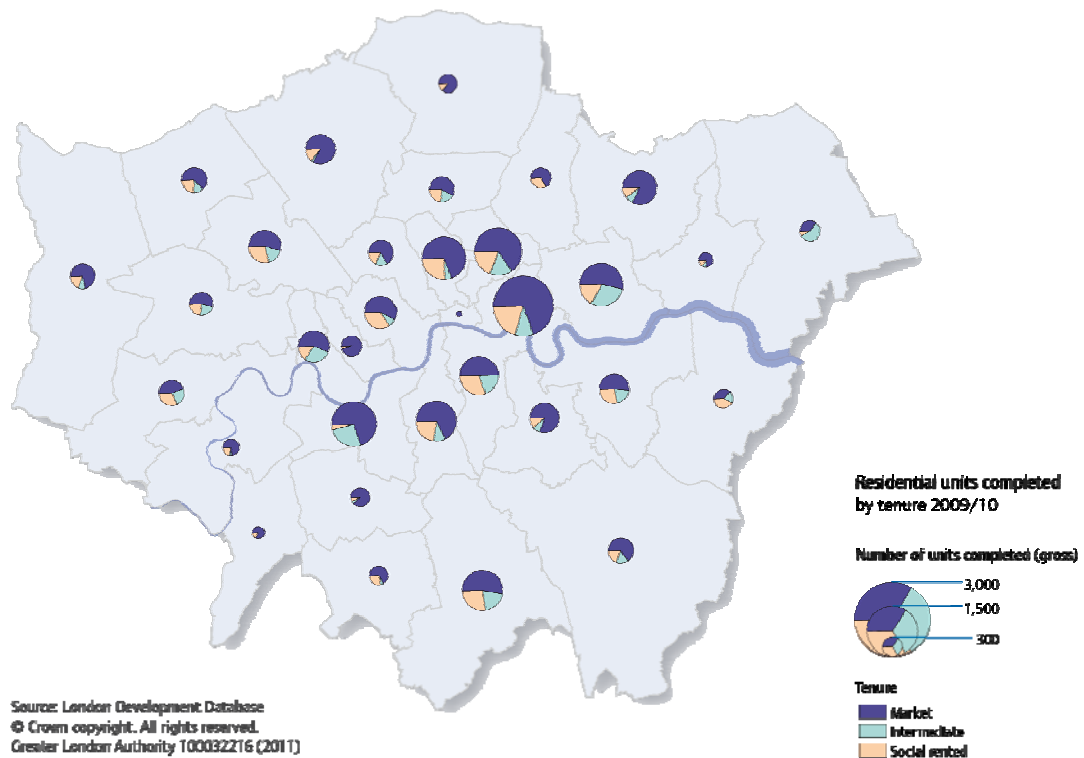
Year	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10
<b>Approvals</b>	<b>55,477</b>	<b>52,987</b>	<b>57,730</b>	<b>80,464</b>	<b>46,450</b>	<b>44,118</b>

Source: London Development Database

4.2.20

Figure 5-2 shows the geography of delivery of new housing of different tenure types across London in 2009/2010.

**Figure 4-2: Residential units completed by tenure 2009/2010**

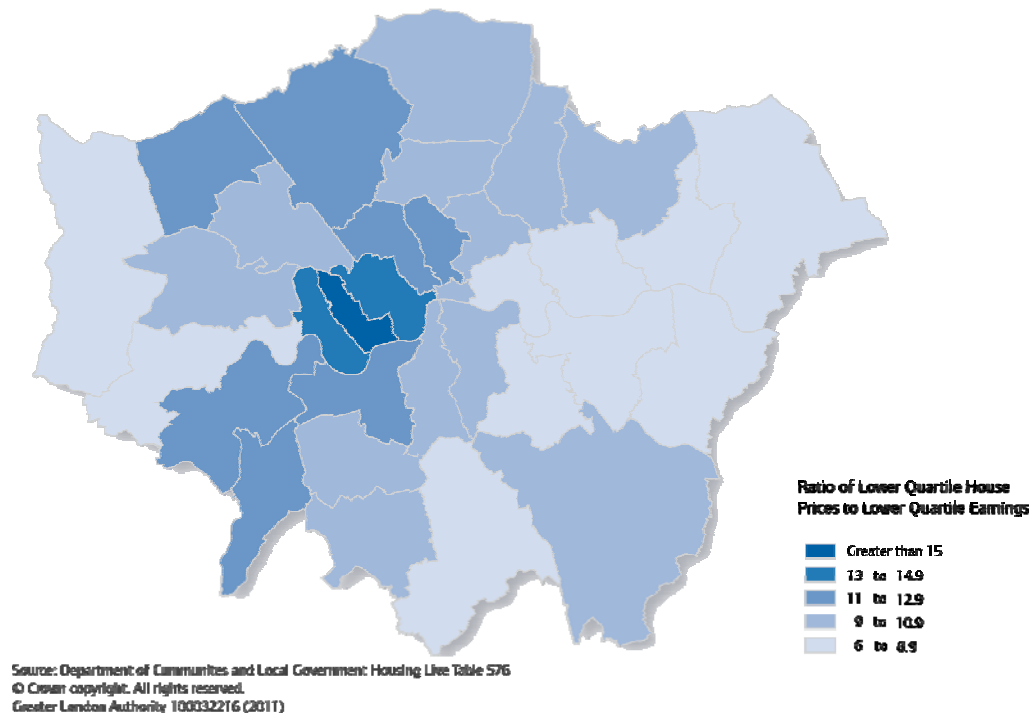


## Housing affordability

- 4.2.21 This is a key concern amongst Londoners. The economic conditions have resulted in a decline in housing sales in London in recent years<sup>15</sup>. There were an estimated 91,000 housing sales in London in 2010, up from 75,000 in 2009 but far below the recent peak of 167,000 in 2006. Despite this decline in sales, average London house prices have risen 5.6 per cent in the last 12 month, faster than any other region.
- 4.2.22 Average rents in London are also significantly higher than in other regions. At £82 a week median social rents in London are 17 per cent higher than the national average, while private rents are 36 per cent higher in London at £173 a week.
- 4.2.23 The drop in housing prices in 2009 improved affordability a small amount but by the end of 2010 in London the ratio of lower quartile house prices to lower quartile earnings had risen to 9.0, ranging from 6.6 to 22.1 across the London boroughs. There is a persistent gap between household incomes and house prices affecting affordability of housing in London. The geography of affordability across London is illustrated in Figure 4-3 below.

<sup>15</sup> Housing: A growing city. GLA, 2011

**Figure 4-3: Ratio of lower quartile house prices to lower quartile earnings**



### **Affordable housing and related policy changes**

- 4.2.24 The Government defined ‘affordable rent’ in June 2011 through revisions to Annex B of Planning Policy Statement 3: Housing. Registered Providers are able to charge up to 80 per cent of market rents on homes which in turn provides a stronger asset base against which to raise private finance to fund the development of new affordable homes. Registered Providers have developed business models based on this new approach. As a result of negotiations between the HCA, the Mayor and Registered Providers, the aggregate of these models is predicated on the assumption that affordable rents will average 65 per cent of market rent across London.
- 4.2.25 The Localism Act introduces the new ‘affordable rent’ product. This is a new form of affordable housing, offering fixed term tenancies (flexible tenancies) for a minimum of two years. This will relate to new tenancies – the rights and tenancies of existing tenants will be protected. Local authorities and social landlords will be producing tenancy strategies and policies.
- 4.2.26 The Government has also announced significant welfare reform including the reduction in the levels of Local Housing Allowance (LHA) through the introduction of caps for different sizes of properties and a lowering of the LHA limit from the 50th to the 30th percentile of local rents and the introduction of a universal credit which will be a maximum of £26,000 per year. Although the Affordable Rent product is actually exempt from the LHA caps, all new Affordable Rent homes in London will be at rents lower than these caps. The Mayor has been in discussions with the Government about the welfare benefit changes to ensure that any unintended consequences for London (due to its high housing costs) are mitigated.

### **4.3 Affordable Rent - Summary of stakeholder views**

- 4.3.1 In order to show how stakeholder views have been taken into consideration, particularly in relation to potential equality and health impacts, a summary of stakeholder views relevant to more than one sustainability objective is presented here. The sections reporting appraisal against individual sustainability objectives additionally draw on specific relevant stakeholder comments. Whilst these views were taken into consideration, their presentation here does not indicate that they are accurate or true. Nor does it indicate that the appraisal team supports the views expressed by stakeholders.
- 4.3.2 Support was expressed by some stakeholders for the early minor alterations' clarification of how the London Plan takes account of national policy changes. The early minor alterations were also welcomed by some stakeholders as supporting delivery of new homes to meet housing needs.
- 4.3.3 A number of local authorities sought revisions to the proposed alterations to enable them to have a role in setting rent levels. Westminster Council foresaw challenges for delivering affordable housing in high cost locations and potential challenges to letting some Affordable Rent homes due to length of tenancy and high rents.
- 4.3.4 A number of councils and other stakeholders expressed support for on-site provision but sought tightened wording to prevent developers arguing for cash in lieu contribution where on or off-site provision is possible.
- 4.3.5 Several stakeholder organisations (TCPA, SE London Partnership, London Tenants Federation, Just Space Network, City of London) raised objections to alterations which state that the new Affordable Rent product is aimed at the same target group as social rented housing and which set a combined target for social rent and affordable housing. A preference was expressed for separate targets for social rented, intermediate and Affordable Rent and to monitor the delivery of each separately.
- 4.3.6 A number of local authorities expressed the view that Affordable Rent housing will not meet the needs of people seeking social rented housing and that due to high housing costs in London, it meets a more similar need to intermediate housing, rather than social rented housing.
- 4.3.7 A number of stakeholders questioned the evidence base for defining a combined target for social rent and Affordable Rent without any assessment of housing need undertaken through a Strategic Market Housing Assessment (SHMA) which takes account of the new Affordable Rent product. For example, Southwark Council comments that existing SHMAs were prepared prior to the introduction of Affordable Rent and so do not consider the need for this type of affordable housing.



- 4.3.8 Objectors drew attention to potential negative effects for social equity due to the combined effects of housing welfare reforms and the Affordable Rent policies in the context of London's very high housing costs. They expressed concern that the consequences would be to force people out of London or to live in overcrowded homes or to increase dependency on benefits.

#### **4.4 What would be the situation without the Early Minor Alterations?**

- 4.4.1 The definition of Affordable Rent is set out for planning purposes in Annex B of the national Planning Policy Statement 3 (PPS3). Not adding Affordable Rent into the definition of affordable housing within the London Plan is likely to result in a lack of clarity with regards to the Affordable Rent product and its role in meeting the need for affordable housing.
- 4.4.2 Without the revised definition of affordable housing and by not including Affordable Rent as part of the 60 per cent target for this overall proportion of affordable housing could create uncertainty and detrimentally affect delivery of schemes, especially the affordable housing component of schemes. It could undermine the ability to reach the London Plan housing target and limit delivery of affordable housing because of the changes in national policy on the funding of affordable housing. This would negatively affect areas in need of regeneration, reduce funding for physical and social infrastructure and limit the ability to achieve mixed and strong communities. It could also negatively affect job creation associated with housing-led regeneration and increase problems of housing affordability.
- 4.4.3 Without a reference to the Mayor's housing strategy, this could reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, which could limit the potential for additional housing to meet demand. This would have negative health and equality impacts.
- 4.4.4 Without these early minor alterations to affordable housing policy, households requiring affordable housing are likely to be negatively impacted, with particular negative impacts for equality and health.
- 4.4.5 Without clarification of the need to make best use of available financial resources in Policy 3.11 efforts to provide affordable housing may not be as economically sustainable and efficient as they should be, thus limiting the amount of overall affordable housing delivered. In turn, this could limit the potential for regeneration. Without this clarification, boroughs may set targets which limit the amount of overall housing delivered. This could limit delivery of family housing, wheelchair housing and lifetime homes, as required by London Plan policies. This could in turn have negative health and equality impacts.
- 4.4.6 Without confirmation of the priority for family housing and the need for Affordable Rent family housing as set out in EMALP, there could be a detrimental effect on the delivery of affordable housing and the affordability of housing for families. Similarly, failure to maximise affordable housing provision for families in London could encourage unsustainable patterns of commuting over longer distances.

- 4.4.7 Without clarification that the new Affordable Rent product should be applied to achieve mixed and balanced communities, there is potential that issues such as mono-tenure estates, typically associated with concentrations of deprivation and worklessness will be further exacerbated.
- 4.4.8 Without the criteria defining the priority order for on-site, off-site and lastly cash in lieu contributions as part of development schemes, boroughs and developers may be unclear regarding the priority. It could result in an imbalance in the delivery of affordable homes across London, reducing opportunities for promoting mixed, sustainable communities.
- 4.4.9 The appraisal took into consideration the findings of the Government's Impact Assessment for Affordable Rent (IA for AR) (CLG,2011) and the Full Equality Impact Assessment for Affordable Rent (EQIA for AR) (CLG, 2011).
- 4.4.10 The Government's IA for AR considered three alternative options, including the preferred option, described as 'Reform the delivery of affordable housing by introducing Affordable Rent, assuming that a proportion of available funding is used to deliver affordable home ownership where this is appropriate for local circumstances and helps promote overall delivery of affordable housing'.
- 4.4.11 The IA for AR considered that 'given a fixed capital budget and within the constraints on government expenditure over the next Spending Review period, Option 3 [preferred option] delivers the greatest net economic benefits, maximises the delivery of new social housing, provides the most diverse range of products for those accessing social housing and would deliver the largest reduction in housing need'.
- 4.4.12 The Government's EQIA for AR recognised potential adverse impacts for some households in being offered affordable rent housing as compared to if they were allocated a social rent property, due to the introduction of time-limited tenure and potential for higher rents. Balanced against that, it identified that the policy would bring substantial advantages to the same type of households by increasing supply. The EQIA for AR identified that in the absence of this policy the resulting limited supply could have the effect that people in housing need would not receive any form of affordable tenancy and would remain in the private rented sector.

## **4.5 Assessment of alterations to Affordable Housing Policies**

### **Introduction**

- 4.5.1 The assessment considers the potential impacts of the early minor alterations to policies on affordable housing policies for selected sustainability objectives in turn.

## Regeneration and Land Use

- 4.5.2 The revised definition of affordable housing should provide clarity on London's position with regards to the proportion of Affordable Rent, which is likely to enable schemes to still deliver affordable housing based on the HCA's/ Mayor's current and likely future funding and delivery arrangements. This is anticipated to stimulate urban renaissance, optimise land use and lead towards the regeneration of deprived parts of London. The delivery of housing schemes overall will support and stimulate regeneration, including investment for social and physical infrastructure. An increased population is likely to support local jobs. This view is reflected in the responses of several stakeholder responses.
- 4.5.3 The introduction of Affordable Rent into the London Plan as part of the definition of affordable housing, and the fact that Affordable Rent will form part of the 60 per cent target of overall provision of social housing provision should particularly benefit areas of deprivation where it enables new housing to be provided to address existing housing need. The intention of the early minor alterations is to achieve delivery in accordance with local demand (para 3.62 of EMALP), with negotiations between the HCA, the Mayor and Registered Providers to ensure rent levels are within welfare caps. There remains some risk that uptake of Affordable Rent housing may be hampered by householders' concerns about affordability. This could limit its beneficial impacts for regeneration, though the significance of this risk is uncertain.
- 4.5.4 The early minor alterations supporting text states that the 'Mayor will provide indicative rent guidelines for Affordable Rented housing developed to ensure maximisation of provision and delivery of the range of policy outcomes in this Plan and in the LHS to inform borough rent and tenure and other housing policies'. These will be published in the LHS and in the London Plan Annual Monitoring Report (AMR) each year'. These guidelines are likely to help address problems of affordability as well as to maximise delivery of additional homes.
- 4.5.5 The changes state that the new Affordable Rent product should be applied to achieve mixed and balanced communities (Policy 3.9). The promotion of mixed and balanced communities, partly through diversifying the range of tenures, is likely to avoid a return to post-war mono-tenure estates, which have often become concentrated areas of deprivation and worklessness. By stimulating urban renaissance and optimising land use in this way, the regeneration of some of the most deprived parts of London is anticipated. This will also contribute to helping to make people feel more positive about the area they live in. However, where the most disadvantaged households find themselves unable to afford the new housing offered in areas of regeneration, they may be excluded from the benefits.
- 4.5.6 Alterations to include the priority for the provision of family housing (Policy 3.12) and confirmation of the need for Affordable Rent family housing will contribute to creating a sense of place and 'vibrancy' as the policies enable the creation of more mixed communities.

## Health and Wellbeing

- 4.5.7 The EMALP to policies 3.10 & 3.11 seek to enable continued delivery of significant volumes of new affordable homes, in line with London Plan targets. This should contribute towards addressing some existing housing needs during the period of the current investment round. The revised definition of affordable housing makes it clear that Affordable Rent provision is intended to increase provision for low income households requiring affordable housing. This should enable conditions detrimental to health and wellbeing, including overcrowding, unsuitable housing, and homelessness to be tackled. This should also contribute to a reduction in health inequalities, since the intended beneficiaries are low income and disadvantaged households.
- 4.5.8 Uncertainty regarding the in-combination effects of the new national Affordable Rent product with housing benefit caps and wider changes in affordable housing provision is relevant to assessment of the potential health impacts of these early minor alterations. The location, supply, affordability and tenure status of housing have potentially important health impacts for Londoners.
- 4.5.9 In their responses to the draft of the EMALP which was published for consultation with statutory consultees, several stakeholders identify possible scenarios of how households may respond to the introduction of Affordable Rent in London, in combination with the welfare caps. These scenarios are likely to have associated negative impacts for health, as identified below:
- Households offered Affordable Rent housing in London may need to allocate a significant share of their income to housing costs. This scenario may result in increased rates of poverty after housing costs, with associated worse health outcomes.
  - Some households may move to different parts of London or out of London in order to apply for affordable housing in cheaper areas. This scenario may result in households losing their social support networks, potentially reducing mental wellbeing.
  - Some households may choose to remain in overcrowded private rental households, perpetuating or newly giving rise to overcrowding. This scenario may result in a range of damaging impacts to short term and long term health, particularly for children.
- 4.5.10 Since the definition of Affordable Rent for planning purposes is introduced nationally through PPS3, these potential impacts cannot be considered to arise as a result on the EMALP.
- 4.5.11 The revised LHS, which helps to support the implementation of the affordable housing policies in the London Plan, includes policies to enable flexibility in rent levels for Affordable Rent housing. This should minimise the negative health impacts associated with differing possible scenarios of how households in London respond to the introduction of Affordable Rent.

- 4.5.12 The EMALP policy 3.12 promotes a more balanced housing mix. Alterations to policy 3.12 prioritise on-site, then off-site provision for affordable housing, then off-site, with financial payments in lieu only accepted in exceptional circumstances. Family housing is also prioritised. These measures will encourage the creation of communities which are mixed in terms of income and profile. Such communities are likely to be more cohesive and sustainable, with associated benefits for health, particularly in creating strong community networks and therefore emotional health. The relevant agencies including the London Boroughs, the HCA and the Mayor will also be able to encourage and prioritise investment offers which cater for groups with particular health needs for example the elderly or disabled people.
- 4.5.13 Uncertainty and the complex relationship with the welfare caps make it difficult to identify the overall impacts for health of the early minor alterations. Whilst the alterations' support for an increased supply of affordable housing is likely to give rise to overall sizeable and long term positive benefits for health, it is more difficult to be certain of the extent to which these potential benefits will be realised.

### **Equality and Diversity**

- 4.5.14 In supporting sustained delivery over the current spending period for significant volumes of new affordable housing, the early minor alterations are likely to benefit people sharing protected characteristics who are particularly disadvantaged by problems of overcrowding, homelessness and living in unsuitable housing. These groups include: children; Black, Bangladeshi, Pakistani and other ethnic minority households; single parent, mainly women-headed, households; as well as pensioner households. Households from certain faith communities, which have generally younger age profiles and hence tend to include more families with dependent children, may also particularly benefit. The early minor alterations are also likely to benefit low income households generally, through supporting an increased supply of affordable homes. These benefits are likely to vary according to where new housing is delivered.
- 4.5.15 Uncertainties regarding how households will respond to the introduction of Affordable Rent within the context of welfare cap reforms, are relevant to how far the potential equality-related benefits of the increased volume of affordable housing will be realised.
- 4.5.16 In their responses to the draft of the EMALP, which was published for consultation with statutory consultees, several stakeholders identify possible scenarios of how households may respond to the introduction of Affordable Rent in London, in combination with the welfare caps. These scenarios may particularly affect certain groups of people who share protected characteristics, as identified below:
- Households offered Affordable Rent housing in London may need to allocate a significant share of their income to housing costs. This scenario is likely to result in increased rates of poverty after housing costs. Certain types of households may be disproportionately affected, though it is

complex to predict how this will relate to protected characteristics. Where this affects households with disabled family members, they may find it particularly hard to cope due to the difficulty of foregoing other forms of expenditure without compromising their ability to participate fully in everyday life. Where it affects households with children, this may affect their ability to afford to participate in activities which are generally considered part of a normal childhood.

- Some households may move to different parts of London or out of London in order to apply for affordable housing in cheaper areas. This could affect a number of groups with protected characteristics who rely on family networks for care and support.
- Some households may choose to remain in overcrowded private rental households, perpetuating or newly giving rise to overcrowding. This scenario could be particularly harmful for children and could disproportionately affect ethnic and faith groups who have younger age profiles and hence comprise many families with dependent children.

4.5.17 Both the early minor alterations and the revised LHS, which helps to support the implementation of the affordable housing policies in the London Plan include important policies to enable flexibility in rent levels for Affordable Rent housing. These measures should minimise adverse equality impacts.

4.5.18 The early minor alterations to policy 3.12 promote a more balanced housing mix. Alterations to policy 3.12 prioritise on-site, then off-site provision for affordable housing, then off-site, with financial payments in lieu only accepted in exceptional circumstances. This is likely to encourage the creation of communities which are mixed in terms of income and profile, thereby fostering good relations between different groups, including between people from different ethnic backgrounds. The early minor alterations emphasise prioritisation of family housing. This is likely to contribute to addressing disadvantage experienced by children living in overcrowded housing, as well as extended (mainly Asian) families and older people who have moved in with family members. An increased supply of family housing is likely to contribute to more cohesive and sustainable communities. The early minor alterations enable relevant agencies to encourage and prioritise investment offers which cater for the particular needs of older people or disabled people, thereby addressing disadvantage experienced by these groups in accessing homes that are suited to their needs.

## **Housing**

4.5.19 The early minor alterations to policies 3.8 and 3.11 are likely to contribute to realising an increased supply of housing. Where this is successfully achieved, this should contribute to reduced homelessness and overcrowding. These policies will increase the range of housing choice, by introducing Affordable Rent housing.



- 4.5.20 The policies may contribute broadly to increased affordability, by increasing the supply of housing at rates below private rental rates. However, the revised affordable housing definition could mean an increase in the cost of affordable housing particularly where private rental rate increases are significant, resulting in corresponding rises in Affordable Rent rates.
- 4.5.21 The provision of new affordable housing to the standards set out elsewhere in the London Plan and in the revised LHS will provide housing to improved design quality, using sustainable design and construction principles, as well as offering improved insulation and energy efficiency. The early minor alterations to policies 3.9 and 3.10 should ensure that a mix of housing is achieved, encouraging the creation of more mixed communities.

### **Employment**

- 4.5.22 The EMALP will enable an increased supply of housing to be realised. This should in turn generate new construction jobs and associated service sector jobs, as well as to stimulate the local economy. Where increases in employment occur in existing areas of deprivation, this will also stimulate regeneration.
- 4.5.23 Increased construction and maintenance jobs may help to reduce overall unemployment, and where suitable support and training is provided alongside this may include reduction to long-term unemployment. However, this is not certain to be significant in the current economic climate, where there is intense competition for jobs.
- 4.5.24 The EMALP is likely to contribute to the attainment of skills relating to the construction sector.
- 4.5.25 The increased provision of housing will provide employment in different parts of London, particularly concentrated in East and outer London where significant volumes of housing is earmarked. There are also sizeable numbers of new housing earmarked for construction in some inner London boroughs.

### **Stable Economy**

- 4.5.26 The EMALP approach to integrating Affordable Rent into the London Plan and reference to the LHS are together likely to minimise delays to planning approvals and encourage new housing to be delivered across London. The delivery of new housing is more likely to support and generate jobs, promote a stable housing industry and stabilise housing costs. The approach is likely to improve sustainable business development by kick-starting investment in deprived parts of London.

- 4.5.27 The reference to ‘overall strategic priority to maximise affordable housing provision and the need to make best use of available resources’ will ensure the percentage of affordable housing sought is reasonable and delivery of affordable housing is maximised, within current and likely future resources and funding arrangements. The delivery of housing is more likely to support and generate jobs, promote a stable housing industry and sustainable housing costs. Over the long term, an increase in housing provision may increase residential spend in areas with large amounts of new housing. This is likely to particularly benefit outer London and east London. Additional housing will help reduce levels of deprivation via job creation (see above assessment on Employment), resulting in increased spending in areas lacking in investment.
- 4.5.28 More generally, the EMALP, by enabling a continued supply of new housing over the current funding period to meet the needs of people working in London, will help maintain London as internationally competitive city.
- 4.5.29 The requirement that new houses are built to high sustainability standards, as set out in the London Plan and LHS, should help encourage the growth of green industries and a low carbon economy.

### **Liveability and Place**

- 4.5.30 The revised affordable housing definition and the inclusion of affordable rent within the overall target for delivery of affordable housing is likely to support sustained delivery of affordable housing as part of major housing schemes, based on the HCA's/ Mayor's funding and delivery arrangements. The delivery of housing schemes overall will support and stimulate investment for social and physical infrastructure improvements promoting sustainable places to live. Additional housing providing housing choice in line with London Plan policies will promote the creation of mixed and balanced communities.
- 4.5.31 The reference to maximising affordable housing provision and the need to make best use of available resources will further support achievement of increased housing choice and sustained delivery of housing, including affordable housing.
- 4.5.32 New housing may be built at a higher density than existing development, which may alter the local character and sense of community. These effects may be either positive or negative.
- 4.5.33 The emphasis on prioritising affordable family housing is likely to help ensure mixed and balanced communities, lifetime neighbourhoods and a greater mix of services and facilities, resulting in more sustainable places.
- 4.5.34 The policy to strengthen the prioritisation of on-site affordable housing is also likely to contribute to ensuring a mixed tenure, towards creating more mixed and balanced communities.



## **5 APPRAISAL OF ADDITIONAL POLICY ALTERATION ON HAZARDOUS SUBSTANCES AND INSTALLATIONS**

### **5.1 Summary of alterations to policies within Chapter 5**

5.1.1 Proposed early minor alterations to the London Plan in Chapter 5 include change to Policy 5.22 on hazardous substances and installations to make provision for the preparation of supplementary guidance on this matter. Changes to the policy can be summarised as:

- Amendment to policy to state that the Mayor may produce supplementary guidance.

5.1.2 This is in line with Circular 1/2008 which states planning guidance published by the Mayor should be based on published policy that has undergone Examination.

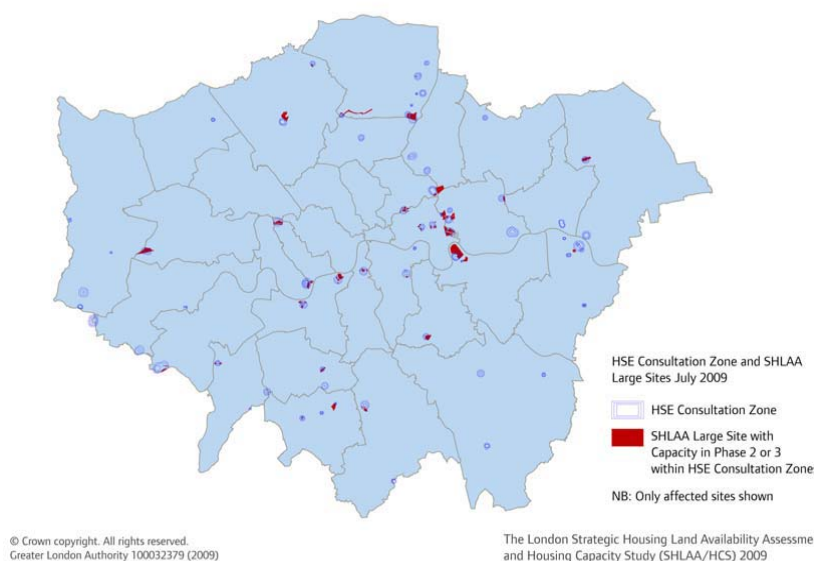
### **5.2 Baseline summary**

5.2.1 A report by Capita Symonds identified 71 hazardous installations and 119 hazardous pipelines across London in 2007. In addition, there are four major hazardous sites within the Greater London area. Of the 71 hazardous installations, 42 are gasholders.

5.2.2 The London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA/HCS) has identified 116 future housing sites that lie within or partially within a consultation zone. These sites have a total probable constrained capacity of 9,767 or 977 units per annum. 1,414 units have been identified within an 'inner zone'; 4,221 units within the 'middle zone' and 4,132 probable units within the 'outer zone'.

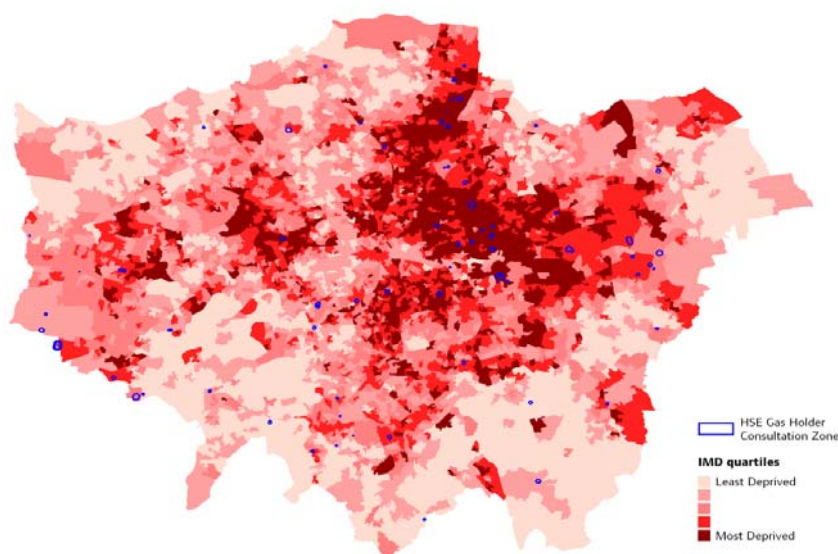
5.2.3 Map 3 shows the gasholder and hazardous installation sites in London, their consultation zone and the sites identified in the SHLAA&HCS 2009 system.

### Map 3: Location of HSE gasholder installations



Map 4 illustrates the distribution of the gasholder and hazardous installation sites relative to areas of deprivation. It shows that there are 21 sites within zones of most deprivation and four sites within the zones of least deprivation.

### Map 4: Locations of gasholder and hazardous installations sites in relation to zones of deprivation in London



### **5.3 What would be the situation without the Early Minor Alterations?**

- 5.3.1 No additional policy alteration on Hazardous Substances and Installations would limit the weight of any Supplementary Planning Guidance (SPG) on hazardous substances. This follows from paragraph 2.22 (Circular 1/2008 - Strategic Planning in London), which states that additional guidance set out by the Mayor should clearly be referenced to the relevant plan policy which it supplements.
- 5.3.2 Without the inclusion of a link to a potential SPG, this could limit the confidence of developers and decision-makers to bring forward schemes near hazardous installations, limiting investment and regeneration opportunities. This could result in poor levels of social infrastructure investment and constrain increased delivery of affordable housing for those in housing need, with negative impacts on health, wellbeing and equality. It could also result in areas remaining unchanged and not attracting investment, preventing regeneration in existing areas of deprivation. Other associated impacts could include limited delivery of new employment land, jobs and training opportunities.

### **5.4 Assessment of additional policy alteration on Hazardous Substances and Installations**

#### **Introduction**

- 5.4.1 The assessment considers the potential impacts of the additional policy in the early minor alterations for selected sustainability objectives in turn. No stakeholder input relevant to these objectives has been received, due to the late inclusion of the policy following consultation.

#### **Regeneration and Land Use**

- 5.4.2 The proposed changes to policy 5.22 to include reference to the Mayor's intention to publish SPG are generally likely to result in a positive impact on regeneration and land-use.
- 5.4.3 Developers and decision makers are often sensitive about schemes near hazardous installations. This can lead to delay in housing delivery and the regeneration of areas. The policy change will give additional weight to any SPG the Mayor publishes in relation to hazardous substances and assist in resolving sensitive matters in line with Circular 1/2008.
- 5.4.4 This may give developers and decision makers the confidence to bring forward schemes near hazardous installations. As a result this may contribute to meeting London's housing target and contribute positively to regeneration and urban renaissance in deprived areas.
- 5.4.5 This may also contribute to people feeling more positive about the area they live as there will be greater assurance of adequate assessments having been carried out for developments near hazardous installations.

- 5.4.6 The EMALP may help to reduce the number of vacant and derelict buildings as developers may be more willing to reuse brownfield sites previously disregarded due to their proximity to hazardous installations. This would also contribute to making the best use of scarce land resources and minimising the impacts of development on the environment through new build elsewhere.

### **Health and Wellbeing**

- 5.4.7 The policy seeks to ensure that developments take into account proximity to hazardous installations and that decommissioning of hazardous materials is funded. The proposed change, including reference to future SPG on the issue, may contribute positively to maximising the health and well-being of the population as the assessment process for development in proximity of hazardous installations may be more rigorous. This will safeguard against the risks and harm present to an individual that increase closer to hazardous installations.
- 5.4.8 Similarly, the SPG may assist with the implementation of the policy , which notes that boroughs should, when assessing developments near hazardous installations, take account of site specific circumstances and proposed mitigation measures. This may further enhance health and wellbeing benefits for nearby communities.
- 5.4.9 In addition, development proposals generally consider the advice of the Health and Safety Executive. A decision is made depending on the number of persons connected with the development, their sensitivity (vulnerable populations such as children, old people) and the intensity of the development. Therefore strengthening the application of this policy, and the associated consultation areas, may ensure further benefits to health and well being.
- 5.4.10 It should be noted that existing baseline<sup>16</sup> on the location of Gas holders indicates that 21 are found within zones of most deprivation and four in the zones of least deprivation (Map 4). Thus the benefits for health identified above are likely to particularly be felt by people who experience deprivation, enabling the policy to contribute to reduced health inequalities.

### **Equality and Diversity**

- 5.4.11 The policy seeks to ensure that developments take into account specific issues relating to the proximity to hazardous installations and that decommissioning of hazardous materials is funded.
- 5.4.12 As a result of the reference to a future potential SPG, developers are likely to be provided with greater certainty regarding the assessment process for development in proximity to Hazardous Installations.

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<sup>16</sup> EMALPEMALP IIA Scoping Report Addendum January 2012

- 5.4.13 The reference to a possible future SPG is likely to facilitate implementation of the policy wording, which notes that boroughs should, when assessing developments near hazardous installations, take account of site specific circumstances and proposed mitigation measures. The development of the proposed SPG offers an opportunity to provide advice on how to mitigate potential issues of mental health as well as physical health impacts, on how to take into consideration issues of deprivation and sensitivity of particular groups to potential impacts of developments located close to hazardous installations. This may prevent future developments exacerbating existing disadvantage and discrimination in areas near to hazardous installations.
- 5.4.14 Evidence shows that a large number of hazardous installations are in areas suffering the greatest deprivation. For example the existing baseline<sup>17</sup> (Figure 4-1) shows the location of Gas holders is significantly higher within zones of high deprivation compared to zones of least deprivation. Giving developers and decision makers the confidence to bring forward schemes, especially derelict sites near hazardous installations can improve a local area. Where they result in more homes and jobs for local people and improved amenity and services, this can improve the social, physical and economic conditions for local people. New homes would be provided in accordance with London Plan policies and deliver additional family and wheelchair housing and lifetime homes, benefitting families, children and disabled people. The development of a possible SPG provides an opportunity for developing guidance that helps minimise possible negative effects for equality (e.g. the worry and mental health effects of living near an installation) and, where possible, enhances opportunities to tackle existing deprivation and disadvantage.

### **Housing**

- 5.4.15 The Health and Safety Executive advises on development proposals near to hazardous installations. Whilst it maintains a flexible approach to proposed development opportunities, some potentially affected sites are high profile developments and provide regeneration opportunities, and so the existence of hazards can bear on the aspirations for the area. Research for the Mayor suggests that this issue could affect up to 10,000 units of housing. Similarly, The London SHLAA identifies 116 future housing sites that lie within or partially within a consultation zone.
- 5.4.16 Without clarification on developments near hazardous sites, the current uncertainty regarding hazardous installations and the location of regeneration sites will intensify the existing delay on the delivery of housing. Publishing an SPG may help resolve the issue, as it will set out considerations for developers to follow to facilitate delivery of development. Therefore if it results in developers being more confident about bringing forward schemes near hazardous installations, the EMALP could have a positive impact on housing.

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<sup>17</sup> EMALPEMALP IIA Scoping Report Addendum January 2012

## **Employment**

- 5.4.17 The EMALP is not anticipated to result in direct significant impacts on the provision of opportunities for rewarding, well-located and satisfying employment for everyone.
- 5.4.18 However, changes to policy 5.22 to include reference to the Mayor's intention to publish an SPG may facilitate regeneration in deprived areas, which could have a positive impact on employment.
- 5.4.19 Currently, developers and decision makers are often sensitive about schemes near hazardous installations. This can lead to delay in housing delivery and the regeneration of areas, including areas of deprivation. The policy change will give additional weight to any SPG the Mayor publishes in relation to hazardous substances and assist in resolving sensitive matters in line with Circular 1/2008. This may give developers and decision makers the confidence to bring forward schemes near hazardous installations.
- 5.4.20 As a result this could contribute to meeting London's housing target and contribute positively to regenerating deprived areas. The construction of new housing may result in increased employment, and developments granted other than housing will provide opportunities for developing workplaces and associated appropriate employment. The EMALP is likely to strengthen the application of policy 5.22 and therefore the policy wording, 'risks should be balanced with the benefits of development and take account of existing patterns of development', may result in further positive impacts against this objective.

## **Stable Economy**

- 5.4.21 The EMALP is anticipated to result in several significant impacts in encouraging a strong, diverse and stable economy and improving the resilience of businesses. Both potential positive and adverse impacts have been identified.
- 5.4.22 As previously mentioned, reference to the Mayor's intention to publish an SPG may facilitate regeneration in deprived areas, as developers and decision makers gain confidence to bring forward schemes near hazardous installations. The increased level of resulting development could have positive impacts on reducing levels of deprivation, through supporting and preventing the loss of local businesses, and providing opportunities for business start-ups. The provision of increased housing development as a result of the EMALP would support a stable economy by providing additional accommodation for the economically active population.
- 5.4.23 The EMALP has the potential to reduce the number of vacant and derelict buildings as developers may be more willing to reuse brownfield sites previously disregarded due to their proximity to hazardous installations. This would contribute to minimising unsustainable resource use by making the best use of existing land resources and buildings.



- 5.4.24 The SHLAA&HCS have identified 116 future housing sites that lie within or partially within a consultation zone<sup>18</sup>. If the SPG referenced in the EMALP results in a more stringent assessment process for developments in proximity to hazardous installations, there may be a delay in the delivery of housing, potentially negating the above mentioned benefits.

### **Liveability and Place**

- 5.4.25 Policy 5.22 states that the Mayor will work with relevant partners to ensure that hazardous substances, installations and materials are managed in ways that limit risk to London's people and environment. The changes proposed in the EMALP will give any SPG produced under this policy additional weight, ensuring that developments located within specified distances of particular hazardous installations take into account the appropriate considerations in relation to the potential hazards. This will contribute positively to creating sustainable environments that promote safety and security.
- 5.4.26 The policy changes will ensure that site specific circumstances and proposed mitigation measures set out in any SPG are considered in the assessment of developments. This will help reduce damage to the physical and natural environment, and protect and improve existing quality of life.
- 5.4.27 The EMALP will give more weight to any SPG produced that gives further guidance to the statement within policy 5.22 that risks should be balanced with the benefits of development and should take account of existing patterns of development. As a result there should be a positive impact on liveability and place as increased development that is locally sensitive may lead to enhancements in the provision of key services and facilities, and the provision of culture, leisure and recreational activities.

### **Open Space**

- 5.4.28 Policy 5.22 ensures that hazardous installations are managed in ways that limit risks to London's people and environment. In areas where development is proposed in proximity to hazardous installations, advice is sought from the HSE who define consultation zones. Based on the HSE's concerns, local authorities may consequently refuse planning applications, for example due to the fact that the risk or harm to an individual is greater the closer a development to a hazardous installation. As a result there may be a positive impact on the protection and enhancement of natural open space in London, if the land which is designated unsuitable for development is landscaped as open space to promote urban greening.

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<sup>18</sup> The impact of the Health and Safety Executive PADHI policy proposals on London Development Agency (LDA) and Greater London Authority policies and projects. Capita Symonds, 2007

- 5.4.29 On the other hand it should be noted that there are a large number of SHLAA sites within the HSE consultation zone. Given that SHLAA sites are particularly large sites where it is generally more feasible and viable to create additional open space for Londoners, compared to smaller development sites, there may be a positive impact on Open Space provision.



## **6 APPRAISAL OF ALTERATIONS TO POLICIES ON CYCLE PARKING STANDARDS**

### **6.1 Summary of alterations to policies within Chapter 6**

6.1.1 Proposed alterations to policies on cycle parking standards within Chapter 6 of the London Plan may be summarised as:

- new standards for office and student housing developments;
- additions for other uses for workers and visitors; and
- clarification on 'sui generis' (unique case) uses and stations.

6.1.2 Associated proposed wording changes within the text of chapter 6 of the London Plan may be summarised as:

- clarification of how cycle parking should be provided;
- clarification cycle parking does not include cycle hire docking stations; and
- note of Mayor's ambitions for car parking.

### **6.2 Baseline summary**

6.2.1 The baseline is drawn from the IIA of the London Plan as well as from the scoping stage of this IIA, which identified updates of relevant baseline information since the IIA of the London Plan.

6.2.2 There has been a shift in modal share away from the car towards more sustainable public transport, walking and cycling. Journey stages by public transport increased in share from 34 per cent in 2000 to 41 per cent in 2008, while cycling increased in share from 1.1 per cent to 1.7 per cent over the same period.

6.2.3 The number of journey stages by cycling grew by around five per cent between 2008 and 2009. It is estimated that cycle journey stages grew by 61 per cent between 2001 and 2009, having been broadly unchanged between 1993 and 2001.

6.2.4 The number of cyclists passing Transport for London Road Network (TLRN) count points<sup>19</sup> grew by five per cent between 2008/09 and 2009/10. Average flows at these points were 117 per cent higher in 2009/10 than in 2000/01.

6.2.5 Between 2008 and 2009, the number of people entering central London by bicycle in the weekday morning peak increased by 15 per cent. This represents a doubling (an increase of 123 per cent) in numbers between 2001 and 2009.

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<sup>19</sup> TfL collects data through a set of permanent automatic cycle counters on selected sections of its road network, known as the TLRN (Transport for London Road Network)

- 6.2.6 Cycle trip rates by London residents increased in 2009/10, particularly among residents of Outer London. Cycle mode share was highest among residents of Inner London at 2.9 per cent, compared with 1.5 per cent for Outer London residents and 2.1 per cent for Londoners overall. Percentage of modal share by cyclists remained consistent at 2 per cent from 2005/6 to 2009/10.
- 6.2.7 Thirty eight per cent of cycle trips are made for work compared to only 23 per cent of all trips by all modes<sup>20</sup>. Whilst there is still potential for growth in work related cycle trips there is greater potential for growth in cycle trips for education and other purposes.
- 6.2.8 Cycle use data collected by Transport for London (TfL)<sup>21, 22</sup> and indicates the following trends:
- higher rates of regular or occasional cycling by males than by females, with the differences in regular cycling by gender more marked (17 per cent amongst males, 8 per cent amongst females);
  - three times higher rates of regular cycling amongst people without a disability (13 per cent) than amongst people with a disability (4 per cent), with similar differences in rates for occasional cycling;
  - nearly 50 per cent of frequent and infrequent cyclists in London are aged between 25 and 44;
  - higher rates of white people (14 per cent) cycling frequently than other ethnic groups, with particularly low rates amongst people of Asian origin (6 per cent) and Black people (9 per cent); and
  - twenty one percent of frequent cyclists are high earners compared to 14 percent of non-cyclists.
- 6.2.9 Cycle security can be affected by cycle parking provision. The Mayor's Cycle Security Plan identifies that according to Metropolitan Police Service (MPS) figures, 23,319 cycles were reported stolen in a public place during 2009/10, a 28 per cent increase on the previous year.
- 6.2.10 TfL's quarterly safety and security survey of Londoners experiences of travelling around London now includes questions about cycle theft. According to the 2009/10 annual consolidated results, 10 per cent of respondents who experienced cycle theft reported subsequently cycling less and eight per cent reporting they no longer cycle. However, very low response rates and possible bias in the questioning cast doubt on the reliability of this baseline evidence.

### 6.3 Economic baseline

- 6.3.1 A report<sup>23</sup> on the contribution cycling makes to the British economy highlights the following findings:
- £2.9 billion gross value of cycling to the UK economy, equalling a gross

<sup>20</sup> Analysis of cycling potential. Travel in London. Transport for London. 2010

<sup>21</sup> Transport for London, 2011, London Travel Demand Survey

<sup>22</sup> Analysis of cycling potential. Travel in London. Transport for London. 2010

<sup>23</sup> The British cycling economy report. Gross Cycling Product Report. London School of Economics & Sky, 2011

cycling product of £230 per cyclist per year;

- bicycles sales in the UK in 2010 had a retail value of £1.62 billion;
- £51 million of UK retail sales were for bicycles manufactured in the UK;
- Around 2,000 retail stores currently operate across a spectrum of activities including sales, servicing, workshops, and other speciality areas;
- There are around 1,000 additional independent specialist cycling shops;
- the economic value of new recreational cyclists can be calculated as £320 per capita;
- new cycle commuters are estimated to contribute £505 per head in terms of typical bicycle and accessory purchases;
- Cycling to work is associated with less sickness absence, with regular cyclists taking on average 7.4 sick days per annum, compared to 8.7 sick days for non-cyclists; and
- Frequent cyclists save the economy £128 million in absenteeism per year and are projected to save a further £1.6 billion in absenteeism over the next 10 years

### **Air quality**

- 6.3.2 A study carried out by GLA found that poor air quality could contribute to over 4,000 deaths a year. Its impacts are felt most severely by vulnerable people such as children, older people and those with existing heart and lung conditions. In addition, people living in areas near major roads – which are often some of the most deprived parts of London – are exposed to particularly high levels of pollution<sup>24</sup>.

## **6.4 Summary of stakeholder views**

- 6.4.1 A summary of stakeholder views relevant to the assessment against various sustainability objectives is provided here. Where stakeholder comments have specific relevance to individual sustainability objectives they are referenced in the relevant assessment section.
- 6.4.2 Transport for London expressed support for the proposed standards, expressing the view that these would enable both the Mayor's target for increased cycling rates future developments to meet growing demand, particularly at offices, amongst students and health workers. Stakeholder input by University College London (UCL) expressed support for the proposed standards for student accommodation as consistent with its own aspirations to increase levels of cycling amongst students.

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<sup>24</sup> GLA, Mayor's Air Quality Strategy, 2010

- 6.4.3 Stakeholder input by the London Cycling Campaign (LCC) seeks more ambitious targets for cycle parking than those set out in the EMALP in order to further maximise the benefits associated with increased rates of cycling. In particular, the LCC proposed alternative minimum standards of: 1/80 cycle parking for business offices; 1/bed for student accommodation (with a reduced visitor parking ratio) and 1/7 for health centre staff cycle parking. LCC also referenced evidence to suggest that new offices are designed with smaller areas of office space per employee than in the past. LCC argues that cycle parking ratios need to reflect the increased density of workers in new offices.

## **6.5 What would be the situation without the Early Minor Alterations?**

- 6.5.1 The situation without the early minor alterations is likely to result in insufficient cycle parking for offices, student accommodation and other uses set out in EMALP Table 6-3. This would not incentivise an increase in cycling and would fail to maximise the opportunity to meet the Mayor's target to increase cycling by 400 per cent (from 2000/1 levels) by 2026. It would prevent the realisation of potential health, equality and economic benefits associated with increased rates of cycling.
- 6.5.2 It would fail to alleviate demand for secure off-street cycle parking. It could likewise result in sustained or increased pressure on existing street cycle parking provision as well as fly-parking (locking up to other street furniture e.g. railings) as well as maintain the vulnerability to theft of cycles parked on the street, discouraging cycling. It could discourage commuter cycling, causing problems associated with the high modal share of (private) motorised transport use to persist. These include: congestion, which has a negative effects for health and for the economy; pollution; noise; and atmospheric emissions. It could exacerbate over-demand for existing cycle parking, worsening the quality of the streetscape and reducing accessibility for pedestrians, especially for people with disabilities.
- 6.5.3 Without increased Cycle Parking Standards, the scope to reduce carbon emissions from transport may be reduced. For example, failure to provide secure and sheltered cycle parking as is specified in the EMALP, could discourage commuter cycling. Similarly, the existing issue of bike theft, which is a major barrier to cycling (London Cycling Action Plan (LCAP), TfL 2004) would persist without the proposed changes to policy wording.
- 6.5.4 Without the proposed clarifications to Policy 6.35, developments that do not have space onsite for visitor parking would be less likely to secure alternative provision for cycle parking. Without the clarification that cycle hire docking stations are not considered a suitable substitution for adequate parking facilities, the overall aim of the standards to increase provision could be undermined.

- 6.5.5 Without the proposed clarification regarding long stay cycle parking being provided on site, the convenience for cyclists would be reduced and could therefore discourage cycling. It could likewise result in sustained or increased pressure on existing street cycle parking provision as well as fly-parking (locking up to other street furniture e.g. railings) as well as maintain the vulnerability to theft of cycles parked on the street, discouraging cycling.

## **6.6 Assessment of alterations to Policies on Cycle Parking Standards**

### **Introduction**

- 6.6.1 The assessment considers the potential impacts of the EMALP to policies on cycle parking standards for selected sustainability objectives in turn.

### **Health and Wellbeing**

- 6.6.2 The measures set out in EMALP, such as the provision of secure off-street/on-site spaces, are likely to help people to live an active lifestyle, by supporting increased provision of long term and visitor cycle parking facilities, in particular at new business offices, student accommodation and health centres within the city, including major refurbishments which involve applications for planning permission. The increased minimum standards are thus likely to support increased uptake of cycling by office workers, students, health staff as well as more generally, via the improved provision for visitors. Cycling has a number of benefits for physical and mental health. It contributes to an active lifestyle, addressing the health risks associated with inactivity, including obesity. It contributes to reduced rates of absenteeism, so the improved provision of cycle parking at business offices may bring health benefits with consequent economic benefits.
- 6.6.3 The proposed standards represent an increase on existing standards, contributing towards the Mayor's ambitions for increased rates of cycling in the city. However, more ambitious standards, as proposed by the London Cycle Campaign, would potentially encourage even greater rates of new take up of cycling to and from work or study by office workers, students and health workers. The potential associated increased health (and associated economic) benefits would need to be balanced against the financial costs borne by developers to satisfy higher minimum standards.
- 6.6.4 Current evidence in the early minor alterations places emphasis on office and student accommodation cycle parking provision, which may particularly benefit people with higher earnings (students may currently have low incomes, but they are likely to enjoy high earnings in the future, relative to individuals who do not undertake further education), reflecting current patterns of higher rates of higher income earners amongst regular cyclists. This presents potential to exacerbate the existing gaps in rates of cycling amongst higher and lower earning individuals, leading to health inequalities. However, the Mayor and TfL are undertaking work on this matter, which isn't reflected in the proposed changes. It is being considered how future changes to standards regarding cycle parking provision at domestic and other use classes can support increased uptake of cycling by lower income individuals and households.

- 6.6.5 Cyclists are often victims of crime when parked bicycles are damaged or stolen, with associated mental health impacts, as well as where this results in people ceasing to cycle, thereby losing the health benefits of cycling. The policy's emphasis on ensuring sheltered, on-site provision for long-term users may contribute to reducing the risks of such crimes, and associated adverse health impacts.
- 6.6.6 Road safety for cyclists is a serious issue in London and incentives for increasing rates of cycling, such as increased parking, should continue to be accompanied by measures to reduce incidences of cycling accidents in London (although these measures go beyond the remit of planning).
- 6.6.7 Adverse health effects may result from the proposed changes that will encourage cycling, as commuter cyclists often breathe in air at street level, including vehicle exhausts and particulates from vehicles. It should however be noted that increased cycling would in the long term would reduce the number of cars on the road and therefore reduce the level of air pollution.

### **Equalities**

- 6.6.8 The EMALP increase provision for cycle parking at business offices, student accommodation, and health centres and for visitors at a range of different use types.
- 6.6.9 In terms of protected characteristics, men, people from white ethnic backgrounds and younger working age people have higher rates of cycling. These same groups are likely to particularly benefits from the improved provision, as existing regular cyclists.
- 6.6.10 The alterations emphasise the importance of improving secure provision. By increasing provision and addressing concerns about security of provision, the revised standards may encourage increased uptake by women and people sharing other protected characteristics amongst office workers, students and health centre employees.
- 6.6.11 Improved visitor provision may be particularly valued by women who tend to make more frequent, shorter trips, which may involve visits to a number of use types. The increased provision may encourage women to switch to making more trips by cycle, motivated by health and financial considerations.
- 6.6.12 Thus although a significant share of the benefits may be enjoyed by white men from a relatively narrow age band, the increased provision may promote widened accessibility and uptake of cycling by other groups.



- 6.6.13 The Early Minor Alterations supporting text makes reference to London Cycling Design Standards (TfL 2005), which includes a small section on Disability Discrimination Act requirements, both to prevent cycle parking being a hazard or barrier to disabled people as well as to include consideration of parking for trikes or trailers used by disabled people. This provides some support for enabling disabled people to benefit from the improved cycle parking, though more explicit wording within the Early Minor Alterations text of the London Plan could strengthen improved provision of cycle parking suited to the needs of Deaf or disabled cyclists including wider bays, explanatory stickers and level access around a parking bay.

### **Employment**

- 6.6.14 The LSE British Cycling Economy report<sup>23</sup> states that annually 23,000 people are employed directly in the cycling economy. The EMALP will contribute to increasing the generation of new cycle employment. Currently, employment in the retail cycle sector provides income, tax and local jobs across the UK. Conservatively, employment in the retail cycling sector in 2010 is estimated to have generated around £400m in wages for the local economy and around £80m in income tax and national insurance contributions. This includes jobs in manufacturing bicycles, retail sale of bikes and accessories, building and maintenance of dedicated cycling infrastructure and skilled jobs in cycle maintenance. Previous research by the Bicycle Association has indicated that the retail bicycle sector alone employs around 20,000 people, with the majority engaged in retail and distribution activities<sup>25</sup>.
- 6.6.15 In isolation, the EMALP are likely to have a minor positive impact. However in combination with investment in other forms of cycle infrastructure (cycle paths) and other efforts to encourage cycling, the cumulative positive impact could be significant.
- 6.6.16 It should however be noted that as a result of increased cycle use and subsequent reduced car use, the positive impacts on employment in the cycle industry may be offset by a minor decrease of employment in the car industry.

### **Stable Economy**

- 6.6.17 The improved cycle parking standards set out in the EMALP may contribute to increased cycling uptake and increased regularity of cycling, including by commuting office workers and by students. As a result it is anticipated that there will be a positive impact on business growth, diversifying the economy and the development of a low carbon economy.
- 6.6.18 The LSE/Sky British Cycling Economy report estimates that bicycle sales, the purchase of cycle accessories, maintenance and cycling employment resulted in a gross cycling contribution to the UK economy of £2.9b in 2010, and a gross cycling product of £230 per cyclist, across the UK cycling population. The EMALP therefore have the potential to bring about additional economic benefits from cycling to those already observed.

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<sup>25</sup> Sustrans/ekogen, (2010). Employment in Sustainable Transport.

- 6.6.19 Increased business in cycle retail sector sales may improve the resilience of cycle shops, including independent cycle shops as local businesses; further benefiting the economy.
- 6.6.20 Health benefits save the economy £128m per year in absenteeism. It has been suggested that regular cyclists take 1 less sick day than non-cyclists per annum. EMALP increased requirements for secure and sheltered parking in new developments and major refurbishments will indirectly contribute to reduced absenteeism by encouraging increased rates of cycling. In combination with other measures to encourage active travel and reduce absenteeism amongst office workers and others, the policies can contribute towards the improved efficiency and competitiveness of London businesses. Where the EMALP support increased rates of cycling, this may contribute to savings in terms of reduced traffic congestion and lower pollution levels.
- 6.6.21 By encouraging a switch to cycling as a more sustainable transport mode, there will be additional pressure and demand to enhance infrastructure. This may benefit the growth of a low carbon economy and contribute to jobs in infrastructure maintenance and revenue from taxes.

### **Climate change mitigation and energy**

- 6.6.22 The proposed alterations to policies and associated proposed wording changes, within Chapter 6 of the London Plan, promote increased capacity for cycle parking, particularly in offices and student accommodation as well as for other uses. This in turn should encourage commuter cycling. Proposed changes to clarify the provision of secure and sheltered cycling infrastructure are likely to further act as an incentive to cycle use by providing adequate facilities for secure parking of cycles and reducing the existing fear of theft that is a major barrier to cycling (London Cycling Action Plan (LCAP), TfL 2004). This will improve the opportunities to achieve a modal shift from means of transport that emit greenhouse gases and anthropogenic heat into the micro-climate to low carbon forms.
- 6.6.23 The promotion of cycling as a low carbon mode of transport through the above changes will contribute positively to climate change effects and will help reduce private vehicle use and therefore reduce carbon emissions from transport. In addition, by taking motor vehicles off London's roads, the changes may contribute to reduced congestion. Reduced congestion should improve traffic flow and lead to reduced journey times and more efficient fuel use. This in turn will result in a positive impact in relation to climate change by lowering greenhouse gas emissions.
- 6.6.24 The City of London Officer response proposes that the Mayor consider the introduction of specific cycle parking standards for stations, rather than dealing with station development on a case by case basis. Alternatively, London Cycle Campaign's response suggests that TfL needs to be empowered to ensure that agreed provision is implemented. These proposals may strengthen the EMALP revised cycle standards' impact on provision of cycle parking facilities to further encourage cycling.



- 6.6.25 Furthermore, to ensure benefits against this objective are maximised, the consultation response from the London Borough of Bromley should be considered. They express concern that the term ‘demonstrated’ in EMALP para 6.35 does not provide a sufficient safeguard against developers who are unwilling to meet the standards. It is recommended that GLA consider the suggestions put forward by London Borough of Bromley, by removing the word ‘demonstrated’ or prefacing it with "In exceptional circumstances".
- 6.6.26 In general the proposed standards represent an increase on existing standards, contributing towards the Mayor’s ambitions for increased rates of cycling in the city. In achieving this, this offers the potential to reduce transport carbon emissions. More ambitious standards, as proposed by the London Cycle Campaign, could potentially encourage even greater rates of new take up of cycling to and from work or study by office workers, students and health workers delivering further climate change benefits. Such standards are being considered are part of an ongoing review of cycle parking standards.

### **Accessibility and Mobility**

- 6.6.27 The higher standards for cycle parking at office businesses, student accommodation, health centres and improved visitor cycle parking across a range of use types may encourage a modal shift to cycling as a more sustainable form of travel amongst affected groups. It may contribute to reduced volumes of car traffic and traffic congestion, through increased use of cycling. The benefits are likely to be particularly important for students and for office workers in London. The increased emphasis on visitor parking will help to encourage more use of cycles for short trips and may facilitate more locally based living. The provision of more secure cycle spaces will reduce clutter from parked bicycles in the street, increasing pedestrian safety.
- 6.6.28 The proposed standards represent an increase on existing standards, contributing towards the Mayor’s ambitions for increased rates of cycling in the city. More ambitious standards, as proposed by the London Cycle Campaign, could potentially encourage even greater rates of new take up of cycling to and from work or study by office workers, students and health workers. Such standards are being considered are part of an ongoing review of cycle parking standards. The potential associated accessibility (and other) benefits would need to be balanced against the financial costs borne by developers to satisfy higher minimum standards.

### **Built and Historic Environment**

- 6.6.29 The nature of the alterations proposed is likely to have limited impact upon the historic environment. Notably, English Heritage’s consultation response states that ‘English Heritage has no comments to make on the proposed alterations to the London Plan’.

- 6.6.30 The Mayor's Cultural Strategy and National Policy adequately set out the protection of designated sites, features and areas of historical, archaeological and cultural value. The increased provision of cycling parking as proposed in the EMALP may put some limited additional pressure on the quality of the cityscape and preservation of the historic environment, in areas which do not fall under designated heritage assets. However, choice of location of cycle parking and design of parking in accordance with TfL guidance is likely to support consideration of potential issues<sup>26</sup>. This will contribute to ensuring that The Mayor's vision and objectives, which include promoting London's heritage, are realised. The provision of more secure spaces predominantly on-site should contribute to reduced clutter in the street associated with 'fly-parking', improving the built environment.

### **Liveability and Place**

- 6.6.31 Liveability is about creating vibrant places where London's diverse communities will want to live and work for the long term. Through the increased standards of cycle parking set out in the EMALP the use of sustainable modes of transport will be promoted. This will help improve sustainable lifestyles and existing quality of life. For example, improved cycle parking will encourage increased engagement in recreational activities (Use Class D2, A3-5 relate to provision for leisure and recreation facilities), opportunities for people to choose an active life will be provided, and it will enhance and promote the perceived sense of place held by the community by reducing private car use. Supply of more secure spaces for long-term parking may also contribute to reduced street clutter, improving the attractiveness of the street scene.
- 6.6.32 Improvements to the sustainable transport system through enhanced cycle parking will contribute towards improved accessibility and will promote social cohesion by integrating communities with opportunities across London. Improvements to the sustainable transport system may also help stimulate regeneration. As such, there is anticipated to be a positive contribution towards liveability and place.
- 6.6.33 The proposed changes contribute to helping reduce damage to the physical and natural environment as increased cycling will both encourage preservation of open space for use as cycle routes, and will reduce demand on existing road capacity therefore reducing the need for expansion of road networks to accommodate motorised transport. Furthermore, an increased level of cycling leading to reduced motorised transport forms will help reduce actual noise levels and disturbances from traffic noise. This may have a minor positive impact on liveability and place.

Cyclists are often victims of crime when parked bicycles are damaged or stolen. The policy's emphasis on ensuring secure and sheltered, on-site provision for long-term users may contribute to reducing the risks of such crimes amongst office employees and students.

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<sup>26</sup> TfL, London Cycle Design Standards, Chapter 8 [http://www.tfl.gov.uk/assets/downloads/businessandpartners/lcds\\_chapter8.pdf](http://www.tfl.gov.uk/assets/downloads/businessandpartners/lcds_chapter8.pdf)

## **Air Quality**

- 6.6.34 Increased provision for cycle parking at office businesses, student accommodation, health centres and improved visitor cycle parking across a range of use types may encourage a modal shift to cycling as a more sustainable form of travel. Similarly, improved standards in terms of secure and sheltered cycling infrastructure will encourage commuter cycling. Given that cycling emits no pollutants such as greenhouse gases, PM10 and NO2, the EMALP will contribute positively to air quality.
- 6.6.35 The promotion of cycling as a low carbon mode of transport through the above changes will contribute positively to air quality as it will contribute to reduced private vehicle use and therefore reduce carbon emissions from transport. In addition, by taking motor vehicles off London's roads, the changes should make a minor contribution to reducing congestion. Reducing congestion is likely to lead to an improvement in traffic flow, including for public transport, resulting in efficient movement of transport. This may reduce journey times and traffic related emissions, and lead to more efficient fuel use, therefore helping to minimise pollution. This in turn will result in a positive impact in relation to air quality.
- 6.6.36 The proposed standards represent an increase on existing standards, contributing towards the Mayor's ambitions to increase cycling by 400 per cent (from 2000/1 levels) by 2026. As TfL state in their consultation response 'in order to encourage further growth in cycling, it is important that cycle parking that is appropriate for the user is provided at the destination, including long stay parking for residents and employees and short stay parking for visitors'. Although the EMALP addresses this through increased provision, more ambitious standards, as proposed by the London Cycle Campaign, could pre-empt future demand from increased cycling and potentially encourage even greater rates of new take up of cycling to and from work or study by office workers, students and health workers. This would deliver further improvements to air quality.

URS considered the effects of the EMALP. Overall, the assessment found the alterations were likely to be broadly positive when considered against the IIA objectives. However, some uncertainty regarding the national introduction of Affordable Rent and the complex relationship with welfare reforms creates some uncertainty about the extent to which the benefits of the alterations to Affordable Housing policy will be realised. Table 7-1 presents a summary of the key findings described in more detail below.

### **Alterations to Affordable Housing Policy**

- 7.1.1 These alterations are likely to support the sustained delivery of new affordable housing. This should have an overall positive impact on regeneration and land use, equalities, health and wellbeing, housing, employment, stable economy, liveability and place and other objectives.
- 7.1.2 However, uncertainty regarding the national introduction of Affordable Rent and the complex relationship with the welfare reforms makes it difficult to be certain about how households will respond to offers of Affordable Rent housing. This makes it uncertain the extent to which potential positive impacts for equality, health and well-being as well as for regeneration and liveability objectives will be realised. Both the EMALP and the revised LHS, supported by negotiations by the Mayor/HCA with registered providers, include measures to mitigate problems of affordability.

### **Alterations to Hazardous substances and installations policy wording**

- 7.1.3 This alteration is likely to provide greater certainty for developers and more robust assessments, in order to support increased delivery of new housing schemes as well as potential new green open spaces on large SHLAA sites near hazardous installations. This can support regeneration and more efficient land use, as well as supporting health and well-being, housing, liveability and place objectives. These benefits are likely to be particularly important in areas of existing deprivation, so may contribute to achieving equality objectives and addressing health inequalities. Evidence shows that there are already a higher number of sites in deprived areas near Hazardous Installations, so this will potentially further the positive impacts of the EMALP.

### **Alterations to Cycle parking standards**

- 7.1.4 The alterations will increase provision of cycle parking, including more secure off-street/on-site parking,. This may contribute towards the achievement of the Mayor's target to improve rates of cycling in London.
- 7.1.5 The improved standards will encourage more cycling, enhancing health and wellbeing, promoting widened uptake of cycling and improving the quality of life for those living and working in London.
- 7.1.6 The standards may achieve some economic benefits, in part by encouraging more active, healthier lifestyles.

## **7.2 Recommendations**

- 7.2.1 In undertaking the appraisal, URS identified a limited number of recommendations for the Mayor to consider towards potentially strengthening either the wording of the EMALP or the implementation of policies. These recommendations are intended to improve achievement of sustainability objectives.

### **Alterations to Affordable Housing Policy**

- 7.2.2 We recommend the Mayor work closely with the Department for Work and Pensions and the Department for Communities and Local Government to monitor and review the actual cumulative effects of these policy changes for Londoners, with an emphasis on identifying patterns that indicate groups of people sharing protected characteristics are differently affected.

### **Alterations to Hazardous substances and installations policy wording**

- 7.2.3 No recommendations.

### **Alterations to Cycle parking standards**

- 7.2.4 We recommend the Mayor:
- with TfL and other partners, consider how future changes to standards regarding cycle parking provision at domestic and other use classes can support increased uptake of cycling by lower income individuals and households. This is principally in order to contribute to equality and health equality objectives;
  - reflect further on the merits of the alternative option of higher standards of cycle parking, drawing on the suggestions put forward by the London Cycle Campaign. This should include balancing up the potential health and economic benefits of increased cycling rates, as identified in the LSE/Sky report, against the costs associated with higher levels of cycle parking provision;
  - continues to promote measures to reduce incidences of cycling accidents in London, in order to contribute to health equality and liveability objectives;
  - consider including explicit wording to ensuring improved provision includes cycle parking suited to the needs of disabled cyclists;
  - consider responses by the City of London officer and the London Cycle Campaign to introduce specific cycle parking standards for stations or to strengthen the power of TfL to require implementation of agreed cycle parking provision at stations; and
  - consider the response by LB of Bromley to strengthen wording in para 6.35 to safeguard against developers unwilling to meet the improved cycle parking standards.

**Table 7-1 : Summary of findings for the IIA of the EMALP**

<b>Policy</b>	<b>3.10A Definition of Affordable Housing -</b>	<b>3.11A Affordable Housing Targets</b>	<b>3.11C Affordable housing targets</b>	<b>3.11 D - Affordable housing targets</b>	<b>3.12A Negotiating affordable housing</b>	<b>3.12C Negotiating affordable housing</b>	<b>5.22A Hazardous substances and installations</b>	<b>6.9 Cycling</b>
<b>Preferred Option</b>	<b>Add affordable rent to the definition of affordable housing</b>	<b>Include affordable rent with social rent within the 60% target of the overall affordable housing provision.</b>	<b>Include a reference to the Mayor's London Housing Strategy</b>	<b>Include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources.</b>	<b>Include a point that advises that the priority is to be accorded to the provision of affordable family housing indicated in policies 3.8 and 3.11.</b>	<b>Introduce a policy that outlines affordable housing should normally be provided on- site. Off-site affordable housing may be provided in exceptional cases, and as a cash in lieu contribution only where the affordable housing policies in this Plan are met.</b>	<b>Add a reference stating the Mayor will consider publishing supplementary guidance to support the application of this policy.</b>	<b>Updated standards as per the proposed table</b>
<b>1. Regeneratio</b>	Overall positive	Overall positive	Overall positive	Overall positive	Overall positive	Overall positive effect	Overall positive effect	N/A

<b>n &amp; Land-Use</b>	effect	effect	effect	effect	effect			
<b>2. Biodiversity</b>	No significant effect	No significant effect	No significant effect	No significant effect	No significant effect	No significant effect	N/A	
<b>3. Health and Well-being</b>	Overall positive effect, some uncertainty	Overall positive effect, some uncertainty	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect
<b>4. Equalities</b>	Overall positive effect, some uncertainty	Overall positive effect, some uncertainty	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect
<b>5. Housing</b>	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	N/A
<b>6. Employment</b>	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	No significant effect	No significant effect	No significant effect	No significant effect
<b>7. Stable Economy</b>	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	No significant effect	No significant effect	Overall positive effect	Overall positive effect
<b>8. Flood risk and Climate Change Adaptation</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



<b>9. Climate Change Mitigation and Energy</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Overall positive effect
<b>10. Water Quality &amp; Water Resources</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>11. Waste</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>12. Accessibility and Mobility</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Overall positive effect
<b>13. Built and Historic Environment</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No significant effect
<b>14. Liveability and Place</b>	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect	Overall positive effect
<b>15. Open Space</b>	N/A	N/A	N/A	N/A	N/A	N/A	Overall positive effect	N/A
<b>16. Air Quality</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Overall positive effect

### 7.3 Monitoring

- 7.3.1 It is a requirement of the SEA Directive to establish how the significant effects of implementing the London Plan and its early minor alterations will be monitored.
- 7.3.2 A set of key performance indicators are identified in the London Plan to monitor its implementation. These KPIs are reported in the London Plan Annual Monitoring Report (AMR).
- 7.3.3 The following key performance indicators (KPIs) are considered relevant to monitoring the effects of the policies affected by the early minor alterations to the London Plan.

No	Key Performance Indicator	Target
1	Maximise the proportion of development taking place on previously developed land	Maintain at least 96 per cent of new residential development to be on previously developed land
4	Increase the supply of new homes	Average completion of a minimum of 32,210 net additional homes per year
5	An increased supply of affordable homes	Completion of 13,200 net additional affordable homes per year
6	Reducing Health Inequalities	Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women)
15	Achieve a reduced reliance on the private car and a more sustainable modal split for journeys	Increase the share of all trips by bicycle from 2 per cent in 2009 to 5 per cent by 2026
20	Reduce carbon dioxide emissions through new development	Annual average percentage carbon dioxide emissions savings for strategic developments proposals progressing towards zero carbon in residential development by 2016 and zero carbon in all development by 2019

- 7.3.4 It is considered that the equality impacts of the EMALP policies concerning affordable housing would be most effectively monitored using indicators for monitoring the equality impacts of the revised London Housing Strategy.

## **8 NEXT STEPS**

- 8.1.1 This IIA Report is issued for consultation alongside the EMALP. The consultation period will run for a minimum of six weeks from Monday 6<sup>th</sup> February to Friday 23<sup>rd</sup> March 2012. Following receipt of comments on the draft EMALP and the IIA Report, an Examination in Public (EIP) will be carried out in Autumn 2012. Following the EIP, the Planning Inspectorate will make recommendations to the Mayor in late 2012. Following consideration of these recommendations, the Mayor will inform the Secretary of State that he intends to publish the early minor alterations to the London Plan, which is anticipated to be adopted in early 2013.
- 8.1.2 During this process amendments may be made to the draft replacement plan and any significant changes will be subsequently reflected in a revised IIA Report to support the published final EMALP.

### **Consultation on this IIA**

This IIA Report is being issued for public consultation alongside the draft Early Minor Alterations to the London Plan (EMALP).

### **How to give your views**

All responses on the draft EMALP and/or the IIA Report must be received by the end of Friday 23<sup>rd</sup> March 2012.

They should be sent to:

**Boris Johnson**

**[Early Minor Alterations]**

**Greater London Authority**

**FREEPOST LON15799**

**London SE1 2BR**

Or by email to:

**mayor@london.gov.uk** with 'Early Minor Alterations to the London Plan' as the title.

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

Assessment of alternative options against each of the sustainability objectives

**Table 9-1: Alternative Options**

Policy 3.10 A - Definition of affordable housing		
<b>General background and assessment</b>		<p>The Government introduced the definition of Affordable Rent into PPS3 for planning purposes, resulting in the need to translate this into planning policy for London</p> <p>Prior to his endorsement of the London Plan, a commitment was made to the Secretary of State to introduce the definition of Affordable Rent into the London Plan</p> <p>The HCA's <i>Affordable Homes Programme Framework</i> sets out the Government's the new funding model for affordable housing. It states that:</p> <ul style="list-style-type: none"> <li>- Affordable Rent is going to be the main affordable housing product delivered; and</li> <li>- social rent will only be funded in exceptional circumstances.</li> </ul> <p>This approach has been taken forward by the Mayor and the Homes and Communities Agency in developing the 2011-15 London affordable housing programme and in the proposals for a new LHS.</p> <p>The Mayor's strategic objective is to maximise delivery of affordable housing in London, enabling London to meet its housing target, also set out in the London Plan. This is also reflected in the Mayor's proposed new LHS.</p>
<b>Preferred option</b>		Add <b>Affordable Rent</b> to the definition of affordable housing
<b>Sustainability Objectives</b>	<b>Alternative option</b>	<b>Alternative option</b>
	Not introducing the definition of Affordable Rent into the London Plan	Introducing a specific definition for London
<b>1. Regeneration and Land-Use</b>	This would leave London's position ambiguous and could delay approvals and therefore delay regeneration schemes that would be required to provide	This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals and therefore delay regeneration

## Policy 3.10 A - Definition of affordable housing

	<p>affordable housing as an element of the overall scheme. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>	<p>schemes that would be required to provide affordable housing as an element of the overall scheme. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect	No significant effect
<b>3. Health and Well-being</b>	<p>This is would leave London's position ambiguous and could delay approvals reducing the delivery of homes, including associated affordable homes and creation of jobs. This is likely to have a negative impact on the health and well-being of those in need of a home or a different type of home (e.g. a larger/smaller home or wheelchair housing) as well as those in need of work.</p> <p><b>Overall negative effect</b></p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals, reducing the delivery of homes, including affordable homes and creation of jobs. This is likely to have a negative impact on the health and well-being of those in need of a home, a different type of home (e.g. a larger/smaller home or wheelchair housing) as well as employment levels.</p> <p><b>Overall negative effect</b></p>
<b>4. Equalities</b>	<p>This would leave London's position ambiguous and could delay approvals reducing the delivery of homes. The delivery of less housing especially affordable homes would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, older people and disabled people.</p> <p><b>Overall negative effect</b></p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals reducing the delivery of homes. The delivery of less housing especially affordable homes would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, the elderly and people with disabilities.</p> <p><b>Overall negative effect</b></p>
<b>5. Housing</b>	This would leave London's position ambiguous and could delay planning approvals	This would leave London's position ambiguous, in that it would be a departure from national

## Policy 3.10 A - Definition of affordable housing

	<p>reducing the delivery of homes, including affordable, family and wheelchair housing and lifetime homes.</p> <p><b>Overall negative effect</b></p>	<p>policy and could delay approvals reducing the delivery of homes, , including affordable, family and wheelchair housing and lifetime homes.</p> <p><b>Overall negative effect</b></p>
<b>6. Employment</b>	<p>This would leave London's position ambiguous and could delay approvals reducing the delivery of homes. This is likely to result in the generation of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities.</p> <p><b>Overall negative effect</b></p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals reducing the delivery of homes. This would result in the provision of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities</p> <p><b>Overall negative effect</b></p>
<b>7. Stable Economy</b>	<p>This would leave London's position ambiguous and could delay approvals reducing the delivery of homes. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become disproportionate to incomes.</p> <p>It would not ensure the efficient use of resources.</p> <p><b>Overall negative effect</b></p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals reducing the delivery of homes. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become disproportionate to incomes.</p> <p>It would not ensure the efficient use of resources.</p> <p><b>Overall negative effect</b></p>
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No significant effect	No significant effect

### Policy 3.10 A - Definition of affordable housing

<b>10. Water Quality and Water Resources</b>	No significant effect	No significant effect
<b>11. Waste</b>	No significant effect	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect	No significant effect
<b>14. Liveability and Place</b>	<p>This would leave London's position ambiguous and could delay approvals, reducing the delivery of schemes that would increase housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>	<p>This would leave London's position ambiguous, in that it would be a departure from national policy and could delay approvals, reducing the delivery of schemes that would increase housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>
<b>15. Open Space</b>	No significant effect	No significant effect
<b>16. Air Quality</b>	No significant effect	No significant effect

### Policy 3.11 A - Affordable housing targets

<b>General background and assessment</b>	<p>The Mayor's strategic objective is to maximise delivery of affordable housing in London, enabling London to meet its housing target, also set out in the London Plan. This is also reflected in the Mayor's proposed new LHS.</p> <p>The need and ability to delivery intermediate housing remains largely the same, and the 40 per cent target for intermediate housing was only recently tested through the replacement London Plan process including</p>
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## Policy 3.11 A - Affordable housing targets

	<p>an examination in public.</p> <p>PPS3 excludes affordable rent from the definition of intermediate affordable housing</p> <p>The HCA's <i>Affordable Homes Programme Framework</i> sets out that:</p> <ul style="list-style-type: none"> <li>- Affordable Rent will form the principle element of the new affordable housing supply; and</li> <li>- social housing will only be funded in exceptional circumstances.</li> </ul> <p>Therefore, it will not be viable or feasible to continue to seek 60 per cent of the overall provision of affordable housing solely as social rent. In addition, the PPS3 and the <i>Framework</i> state that Affordable Rent is to meet the same housing need as social rent and therefore in line with the SHMA it is appropriate to seek 60 per cent of the affordable housing proportion as social rent and affordable rent. Affordability is likely to be addressed through the benefits system.</p> <p>A change to the affordable housing proportions is likely to reduce long-term flexibility and potentially require alteration of the London Plan for each affordable housing programme funding round as the balance between the two products shifts.</p>		
<b>Preferred option</b>	<b>Include Affordable Rent with social rent within the 60 per cent target of the overall affordable housing provision</b>		
<b>Sustainability Objectives</b>	<b>Alternative option</b>	<b>Alternative option</b>	<b>Alternative option</b>
	Not to include Affordable Rent as part of 60 per cent target for overall proportion of affordable housing.	To introduce a different split for delivery of social rent, Affordable Rent and intermediate affordable housing.	To set separate targets for each of social and affordable rented housing.
<b>1. Regeneration and Land-Use</b>	<p>This would create uncertainty which is likely to delay the delivery of affordable housing as well as developments required to provide affordable housing as an element of the overall regeneration scheme.</p> <p>Delays can also result in the</p>	<p>This approach would not give sufficient regard to the range of factors justifying the 60:40 split recently justified through the London Plan process, including likely future funding arrangements and therefore could create delays in the delivery of schemes that would support and stimulate</p>	<p>This approach would not enable sufficient regard to be given to current and likely future funding arrangements and therefore could create delays in the delivery of schemes that would support and stimulate regeneration. It would also reduce flexibility should the balance</p>

## Policy 3.11 A - Affordable housing targets

	<p>developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>	<p>regeneration.</p> <p><b>Overall negative effect</b></p>	<p>between social and affordable rented accommodation change in future.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect	No significant effect	No significant effect
<b>3. Health and Well-being</b>	<p>This would create uncertainty which is likely to delay the delivery of schemes, including provision of affordable homes and the creation of jobs. This is likely to have a negative impact on the health and well-being of those in need of a home or a different type of home (e.g. a larger/smaller home or wheelchair housing) as well as those in need of work.</p> <p><b>Overall negative effect</b></p>	<p>This approach would appear to enable London to set its own proportions however the required proportions of affordable housing are unlikely to be funded under the HCA's/ Mayor's current and likely future funding and delivery arrangements and therefore could create delays in the delivery of schemes. This is likely to have a negative impact on the health and well-being of those in need of a home or a different type of home (e.g. a larger/smaller home or wheelchair housing) as well as those in need of work.</p> <p><b>Overall negative effect</b></p>	<p>This approach would not enable the required proportions of affordable housing could be funded in line with the HCA's/ Mayor's current and likely future funding and delivery arrangements and therefore could create delays in the delivery of schemes. This is likely to have a negative impact on the health and well-being of those in need of a home or a different type of home (e.g. a larger/smaller home or wheelchair housing) as well as those in need of work.</p> <p>It would also reduce flexibility should the balance between social and affordable rented accommodation change in future</p> <p><b>Overall negative effect</b></p>
<b>4. Equalities</b>	This would create	This approach would	This approach would

## Policy 3.11 A - Affordable housing targets

	<p>uncertainty which is likely to delay the delivery of schemes. The delivery of less housing especially affordable homes would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, older people and disabled people.</p> <p><b>Overall negative effect</b></p>	<p>appear to enable London to set its own proportions however the required proportions of affordable housing are unlikely to be funded under the HCA's/ Mayor's current and likely future funding and delivery arrangements.</p> <p>Therefore this approach would result in the overall delivery of less affordable housing which would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children older people and disabled people.</p> <p><b>Overall negative effect</b></p>	<p>appear to enable a target to be set out for the provision of social rent, which would have lower rents than affordable rent. However funding will generally only be provided for Affordable Rent in line with the HCA's/ Mayor's current and likely future funding and delivery arrangements. Therefore this approach is likely to result in the overall delivery of less affordable housing which would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children older people and disabled people.</p> <p><b>Overall negative effect</b></p>
<b>5. Housing</b>	<p>This would create uncertainty which is likely to delay the delivery of housing schemes. This would be likely to undermine the ability to reach the London Plan</p>	<p>This approach is likely to result in the delay in the delivery of housing and reduce the delivery of affordable housing as it would not be viable to continue to seek any proportion of the</p>	<p>This approach is likely to result in the delay in the delivery of housing and reduce the delivery of affordable housing as it would not be viable to continue to seek any proportion of the</p>

## Policy 3.11 A - Affordable housing targets

	<p>housing target as well as not maximise the delivery of affordable housing.</p> <p>Not identifying any proportion would also fail to provide strategic direction for London as to the mix of affordable homes that the Mayor would wish to see delivered to best meet London's housing need.</p> <p><b>Overall negative effect</b></p>	<p>overall provision of affordable housing as social rent due to the restricted funding arrangements. The need and ability to delivery intermediate housing remains largely the same as the existing in the London Plan.</p> <p>This approach would not ensure the maximum provision of affordable housing and assist in delivering London's housing target.</p> <p><b>Overall negative effect</b></p>	<p>overall provision of affordable housing as social rent due to the restricted funding arrangements, as under the current affordable housing programme social rent provision will only be supported in exceptional circumstances.</p> <p>This approach would not ensure the maximum provision of affordable housing and assist in delivering London's housing target.</p> <p>It would also reduce flexibility should the balance between social and affordable rented accommodation change in future</p> <p><b>Overall negative effect</b></p>
<b>6. Employment</b>	<p>This would create uncertainty which is likely to delay the delivery of housing schemes. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become</p>	<p>This would not be viable or feasible under the current affordable housing funding programme and could reduce the delivery of housing and schemes that are to provide housing as an element of an overall development. The delivery of fewer homes in London is likely to result in the generation of fewer jobs in the</p>	<p>This would not be viable or feasible under the current affordable housing funding programme and could reduce the delivery of housing and schemes that are to provide housing as an element of an overall development. The delivery of fewer homes in London is likely to result in the generation of fewer jobs in the</p>

## Policy 3.11 A - Affordable housing targets

	increasingly disproportionate to incomes. <b>Overall negative effect</b>	construction and related service (retail, finance and legal) sector as well as fewer training opportunities. <b>Overall negative effect</b>	construction and related service (retail, finance and legal) sector as well as fewer training opportunities. <b>Overall negative effect</b>
<b>7. Stable Economy</b>	This would create uncertainty which is likely to delay the delivery of housing schemes. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become increasingly disproportionate to incomes. <b>Overall negative effect</b>	This would not be viable or feasible under the current affordable housing funding programme and could reduce the delivery of housing and schemes that are to provide housing as an element of an overall development. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become increasingly disproportionate to incomes.  It would not ensure the most efficient use of resources. <b>Overall negative effect</b>	This would not be viable or feasible under the current affordable housing funding programme and could reduce the delivery of housing and schemes that are to provide housing as an element of an overall development. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become increasingly disproportionate to incomes.  It would not ensure the most efficient use of resources. <b>Overall negative effect</b>
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect	No significant effect	No significant effect

## Policy 3.11 A - Affordable housing targets

<b>9. Climate Change Mitigation and Energy</b>	No significant effect	No significant effect	No significant effect
<b>10. Water Quality and Water Resources</b>	No significant effect	No significant effect	No significant effect
<b>11. Waste</b>	No significant effect	No significant effect	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect	No significant effect	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect	No significant effect	No significant effect
<b>14. Liveability and Place</b>	<p>This is likely to create uncertainty and delay the delivery of housing due to the lack of funding for the affordable element. The delivery of less housing would limit the increase in housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative</b></p>	<p>This is likely to create uncertainty and delay the delivery of housing due to the lack of funding for the affordable element. The delivery of less housing would limit the increase in housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>	<p>This is likely to create uncertainty and delay the delivery of housing due to the lack of funding for the affordable element. The delivery of less housing would limit the increase in housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities. Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>

### Policy 3.11 A - Affordable housing targets

	effect		
<b>15. Open Space</b>	No significant effect	No significant effect	No significant effect
<b>16. Air Quality</b>	No significant effect	No significant effect	No significant effect

### Policy 3.11 C - Affordable housing targets

<b>General background and assessment</b>	<p>The Mayor's strategic objective is to maximise delivery of affordable housing in London, enabling London to meet its housing target, also set out in the London Plan. This is also reflected in the Mayor's proposed new LHS.</p> <p>The Mayor has to ensure consistency between his strategies including between the London Plan and the Housing Strategy as required by section 41(5) of the Greater London Authority Act 1999.</p> <p>The Mayor has a new role in the delivery of housing in London which is reflected in the LHS. The LHS sets out how public funding for housing in London is to be invested as well as his objectives for housing across London on a range of housing issues.</p> <p>Referring to the Mayor's Housing Strategy in policy enables the Mayor to take the strategy into account in planning decisions.</p>		
<b>Preferred option</b>	Include a reference to the Mayor's LHS		
<b>Sustainability Objectives</b>	<b>Alternative option</b>		
	<b>Not including a reference to the Mayor's Housing Strategy</b>		
<b>1. Regeneration and Land-Use</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, which could limit the potential for the regeneration of an area, including attracting investment.</p> <p><b>Overall negative effect</b></p>		
<b>2. Biodiversity</b>	No significant effect		



## Policy 3.11 C - Affordable housing targets

<b>3. Health and Well-being</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, which could limit the potential for additional housing that meets current higher standards and can meet local demand for wheelchair and family housing, as required by other policies in the London Plan which would meet health and well-being needs of the community.</p> <p><b>Overall negative effect</b></p>
<b>4. Equalities</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, which could limit the potential for additional housing that meets current higher standards and can meet local demand for wheelchair and family housing, as required by other policies in the London Plan which would meet health and well-being needs of the community.</p> <p><b>Overall negative effect</b></p>
<b>5. Housing</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London, potentially resulting in the housing target within the London Plan not being met.</p> <p><b>Overall negative effect</b></p>
<b>6. Employment</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London. The delivery of fewer homes in London is likely to result in the generation of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities.</p> <p><b>Overall negative effect</b></p>
<b>7. Stable Economy</b>	<p>This would reduce the ability of the Mayor to deliver his housing and affordable housing programme across London. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become disproportionate to incomes.</p> <p>It would not ensure the most efficient use of resources.</p> <p><b>Overall negative effect</b></p>
<b>8. Flood risk and Climate Change Adaptation</b>	<p>No significant effect</p>
<b>9. Climate Change Mitigation</b>	<p>No significant effect</p>

### Policy 3.11 C - Affordable housing targets

<b>and Energy</b>	
<b>10. Water Quality and Water Resources</b>	No significant effect
<b>11. Waste</b>	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect
<b>14. Liveability and Place</b>	<p>This would reduce the ability of the Mayor to deliver his housing programme across London. The delivery of less housing would limit the increase in housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced communities.</p> <p>Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>
<b>15. Open Space</b>	No significant effect
<b>16. Air Quality</b>	No significant effect

### Policy 3.11 D - Affordable housing targets

<b>Preferred option</b>	Include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources.
<b>Sustainability</b>	<b>Alternative option</b>

## Policy 3.11 D - Affordable housing targets

<b>Objectives</b>	<b>Not to include a reference to overall strategic priority to maximise affordable housing provision and the need to make best use of available resources.</b>
<b>1. Regeneration and Land-Use</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered, which in turn could limit the potential for the regeneration of an area, including attracting investment.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect
<b>3. Health and Well-being</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. This could limit the potential for additional housing at below market rents to improve the health of well-being of those currently in inappropriate housing as new housing would meet higher standards and could meet local demand for wheelchair and family housing, as required by other policies in the London Plan for those on low incomes.</p> <p><b>Overall negative effect</b></p>
<b>4. Equalities</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. Therefore this approach is likely to result in the overall delivery of less affordable housing which would also result in the delivery of less family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less housing that is likely to be suitable for families, children, older people and disabled people at below market rent.</p> <p><b>Overall negative effect</b></p>
<b>5. Housing</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. This would limit the ability to meet the Mayor's affordable housing target and limit the number of below market rent homes provided.</p> <p><b>Overall negative effect</b></p>
<b>6.</b>	Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the

## Policy 3.11 D - Affordable housing targets

<b>Employment</b>	<p>amount of overall affordable housing delivered. The delivery of fewer homes in London is likely to result in the generation of fewer jobs in the construction and related service (retail, finance and legal) sector as well as fewer training opportunities.</p> <p><b>Overall negative effect</b></p>
<b>7. Stable Economy</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. The delivery of fewer homes in London is likely to result in the generation of fewer jobs and increases the overall cost of housing which can have a negative impact on the economy as housing costs become disproportionate to incomes. It would not ensure the most efficient use of resources.</p> <p><b>Overall negative effect</b></p>
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No significant effect
<b>10. Water Quality and Water Resources</b>	No significant effect
<b>11. Waste</b>	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect
<b>14. Liveability and Place</b>	<p>Without this reference boroughs may set their percentage of affordable housing requirements based on different principles which could limit the amount of overall affordable housing delivered. The delivery of less housing would limit the increase in housing choice in line with London Plan policies. This would delay the delivery of mixed and balanced</p>

### Policy 3.11 D - Affordable housing targets

	<p>communities.</p> <p>Delays can also result in the developer having reduced funding available for physical and social infrastructure.</p> <p><b>Overall negative effect</b></p>
<b>15. Open Space</b>	No significant effect
<b>16. Air Quality</b>	No significant effect

### Policy 3.12 A - Negotiating affordable housing

<b>General background and assessment</b>	<p>Families are one of the groups with the most need for affordable housing</p> <p>The overall strategic objective is to maximise the delivery of affordable housing and for London to meet its overall housing target, as set out in the Mayor's Housing Strategy.</p> <p>Past funding models have made the delivery of affordable family housing less attractive.</p>
<b>Preferred option</b>	<b>Include a point that advises that the priority is to be accorded to the provision of affordable family housing indicated in policies 3.8 and 3.11.</b>
<b>Sustainability Objectives</b>	<b>Alternative option</b>
	<b>Not introducing a priority for family housing.</b>
<b>1. Regeneration and Land-Use</b>	<p>This approach could result in the delivery of less family sized affordable housing which will result in a less diverse community and perhaps less variety in the provision of services and facilities resulting in less vibrant places.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect
<b>3. Health and Well-being</b>	<p>This approach is likely to result in the delivery of less family sized affordable housing which in the long term can exacerbate overcrowding for low income families in London, which can have a negative impact on health and well-being, especially of children.</p>

## Policy 3.12 A - Negotiating affordable housing

	<b>Overall negative effect</b>
<b>4. Equalities</b>	<p>This approach could result in less delivery of family sized affordable housing, not alleviating need and poverty especially for families and therefore children.</p> <p><b>Overall negative effect</b></p>
<b>5. Housing</b>	<p>This approach is likely to result in the delivery of fewer family sized affordable housing, depending on funding. However, this approach could result in the overall number of housing units provided to be increased as smaller units generally require less space and funding.</p> <p><b>Overall neutral effect</b></p>
<b>6. Employment</b>	No significant effect
<b>7. Stable Economy</b>	No significant effect
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No significant effect
<b>10. Water Quality and Water Resources</b>	No significant effect
<b>11. Waste</b>	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect
<b>14. Liveability</b>	<p>This approach could result in less delivery of family sized affordable housing, reducing the possibility of mixed and balanced communities</p>

### Policy 3.12 A - Negotiating affordable housing

<b>and Place</b>	and the variety of facilities and services provided due to the narrower demographic profile resulting in less sustainable communities.  <b>Overall negative effect</b>
<b>15. Open Space</b>	No significant effect
<b>16. Air Quality</b>	No significant effect

### Policy 3.12 C - Negotiating affordable housing

<b>General background and assessment</b>	<p>The overall strategic objective is to maximise the delivery of additional affordable housing and for London to meet its overall housing target, as set out in the Mayor's Housing Strategy.</p> <p>Contributions towards affordable housing are occasionally being provided as payments in lieu but are being spent on affordable housing issues that do not result in the delivery of additional affordable housing.</p> <p>The policy will give weight to the supporting text.</p> <p>This policy will enable the Mayor to ensure that boroughs' plans conform with this approach</p>	
<b>Preferred option</b>	<p><b>Introduce a policy that outlines affordable housing should normally be provided on-site. Off-site affordable housing may be provided in exceptional cases, and as a cash in lieu contribution only where the affordable housing policies in this Plan are met.</b></p>	
<b>Sustainability Objectives</b>	<p><b>Alternative option</b></p> <p><b>Not introducing the criteria into policy.</b></p>	<p><b>Alternative option</b></p> <p><b>Setting out a different order of priorities or not covering some types of delivery such as funding agreed programmes for the provision of affordable homes.</b></p>
<b>1. Regeneration and Land-Use</b>	<p>Boroughs and developers may be unclear about the priority the Mayor places on actual delivery of additional affordable housing and of mixed and balanced communities. The outcomes of this approach are unknown. The lack of clarity on the priority to be given to actual delivery</p>	<p>Another approach may enable the segregated provision of affordable and market housing limiting investment and therefore regeneration opportunities in some areas, compared to other areas.</p> <p><b>Overall negative effect</b></p> <p>A less flexible approach could result</p>



## Policy 3.12 C - Negotiating affordable housing

	<p>on a site could limit the investment attracted by a scheme towards the regeneration of an area.</p> <p><b>Overall negative effect</b></p>	<p>in less efficient use of resources, which could result in developers having fewer resources to invest in other aspects of the scheme such as social and physical infrastructure and the overall regeneration of the area.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect	No significant effect
<b>3. Health and Well-being</b>	<p>The outcomes of this approach would be uncertain. If less additional affordable housing is provided it would not contribute to the supply of low cost accommodation in London, limiting the potential to improve the health of well-being of those currently in inappropriate housing as new housing would meet higher standards and could meet local demand for wheelchair and family housing, as required by other policies in the London Plan for those on low incomes.</p> <p><b>Overall negative effect</b></p>	<p>This is likely to result in the delivery of less additional affordable housing and would not contribute to the supply of permanent low cost accommodation in London, limiting the potential to improve the health of well-being of those currently in inappropriate housing as new housing would meet higher standards and could meet local demand for wheelchair and family housing, as required by other policies in the London Plan for those on low incomes.</p> <p><b>Overall negative effect</b></p>
<b>4. Equalities</b>	<p>The outcomes of this approach would be uncertain. However due to funding restraint it is likely to result in the provision of fewer additional affordable housing. Therefore this approach would be also likely to result in the delivery of fewer family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less affordable housing that is likely to be suitable for families, children older people and disabled people.</p> <p><b>Overall negative effect</b></p>	<p>This is likely to result in the delivery of less additional affordable housing. Therefore this approach would be also likely to result in the delivery of fewer family and wheelchair housing and lifetime homes as required by London Plan policies. This would result in the provision of less affordable housing that is likely to be suitable for families, children, older people and disabled people.</p> <p><b>Overall negative effect</b></p>

## Policy 3.12 C - Negotiating affordable housing

<b>5. Housing</b>	<p>The outcomes of this approach would be uncertain. If less additional affordable housing is provided this approach is unlikely to contribute towards meeting London's affordable housing needs.</p> <p>It is not likely to affect the supply of overall housing.</p> <p><b>Overall negative effect</b></p>	<p>Another approach would not maximise the delivery of additional affordable housing</p> <p>It is not likely to significantly affect the supply of overall housing.</p> <p><b>Overall negative effect</b></p> <p>A less flexible approach could result in less efficient use of resources, which could result in a reduced supply of affordable housing and overall housing.</p> <p><b>Overall negative effect</b></p>
<b>6. Employment</b>	No significant effect	No significant effect
<b>7. Stable Economy</b>	No significant effect	No significant effect
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No significant effect	No significant effect
<b>10. Water Quality and Water Resources</b>	No significant effect	No significant effect
<b>11. Waste</b>	No significant effect	No significant effect
<b>12. Accessibility and Mobility</b>	No significant effect	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect	No significant effect

## Policy 3.12 C - Negotiating affordable housing

<b>14. Liveability and Place</b>	<p>The outcomes of this approach are unknown. The lack of clarity could limit the variety of tenure on a site and lead to, or further polarise communities.</p> <p><b>Overall negative effect</b></p>	<p>The lack of clarity could limit the variety of tenure on a site and lead to, or further polarise communities.</p> <p>However a more stringent approach may result in the less efficient use of resources or other London Plan policies (such as those to protect strategically important employment clusters) being compromised.</p> <p><b>Overall negative effect</b></p>
<b>15. Open Space</b>	No significant effect	No significant effect
<b>16. Air Quality</b>	No significant effect	No significant effect

## Policy 5.22 A - Hazardous substances and installations

<b>General background and assessment</b>	<p>Developers and decision makers are sensitive about schemes near hazardous installations. These sensitivities could delay housing delivery and regeneration of areas</p> <p>SPG the Mayor publishes in relation to hazardous substances and assist in resolving sensitive matters in line with Circular 1/2008</p>
<b>Preferred option</b>	Add a reference stating the Mayor will consider publishing supplementary guidance to support the application of this policy.
<b>Sustainability Objectives</b>	<p><b>Alternative option</b></p> <p>Not introducing a link to a potential SPG.</p>
<b>1. Regeneration and Land-Use</b>	<p>This would limit the weight of any SPG, limiting the confidence of developers and decision makers to bring forward schemes near hazardous installations. This would limit investment and regeneration opportunities in the area.</p> <p><b>Overall negative effect</b></p>
<b>2. Biodiversity</b>	No significant effect
<b>3. Health and</b>	Limiting the weight of any SPG and therefore the confidence of developers

## Policy 5.22 A - Hazardous substances and installations

<b>Well-being</b>	<p>and decision makers to bring forward schemes near hazardous installations could result in areas remaining unchanged and not attracting investment. If this results in poor levels of amenity and no additional housing being provided for those in inappropriate accommodation, this can have negative impacts on health and well-being.</p> <p><b>Neutral effect</b></p>
<b>4. Equalities</b>	<p>Limiting the weight of any SPG and therefore the confidence of developers and decision makers to bring forward schemes near hazardous installations could result in areas remaining unchanged and not attracting investment. This could result in some areas remaining deprived.</p> <p><b>Neutral effect</b></p>
<b>5. Housing</b>	<p>Limiting the weight of any SPG and therefore the confidence of developers and decision makers to bring forward schemes would limit the amount of additional housing delivered.</p> <p><b>Overall negative effect</b></p>
<b>6. Employment</b>	<p>Limiting the weight of any SPG and therefore the confidence of developers and decision makers to bring forward schemes is likely to result in local jobs and training opportunities not being created.</p> <p><b>Overall negative effect</b></p>
<b>7. Stable Economy</b>	<p>Limiting the weight of any SPG and therefore the confidence of developers and decision makers to bring forward schemes would limit the delivery of new homes, employment land and jobs.</p> <p><b>Overall negative effect</b></p>
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No significant effect
<b>10. Water Quality and Water Resources</b>	No significant effect
<b>11. Waste</b>	No significant effect

Policy 5.22 A - Hazardous substances and installations	
<b>12. Accessibility and Mobility</b>	No significant effect
<b>13. Built and Historic Environment</b>	No significant effect
<b>14. Liveability and Place</b>	<p>Limiting the weight of any SPG and therefore the confidence of developers and decision makers to bring forward schemes. If there is no new investment in the area, there is limit opportunity for improved services and amenity, apart from those provided by the local authority. This would have a particularly negative impact in areas of deprivation.</p> <p><b>Overall negative effect</b></p>
<b>15. Open Space</b>	<p>Where development is not the catalyst for change and investment there are limited opportunities for the provision of new open spaces and they are unlikely to be provided.</p> <p><b>Overall negative effect</b></p>
<b>16. Air Quality</b>	No significant effect

Policy 6.9 - Cycling	
<b>General background and assessment</b>	<p>Increasing the number of people cycling and the cycling modal share is a priority for the Mayor. The Mayor's target is for cycling to represent 5 per cent of the transport mode in London by 2026. Paragraph 6A.11 of the London Plan states that TfL intends to carry out a review of cycle parking standards, and will bring forward early alterations to this Plan when new standards are available.</p> <p>TfL has evidence to support new standards for some land uses.</p> <p>The provision of additional cycle parking spaces at places where people work, live or of other places of interests will give them the confidence to bring their bicycles to these places. This will result in a greater number of cycle trips.</p> <p>Cycling generally has health, congestion and air quality benefits.</p> <p>Cycling is a relatively cheap and flexible form of travel.</p> <p>Securing spaces predominantly on-site reduces clutter in the street, increasing pedestrian safety</p>

## Policy 6.9 - Cycling

Preferred option	Updated standards as per the proposed table		
Sustainability Objectives	Alternative option	Alternative option	Alternative option
	Not to update standards.	Update all the cycle parking standards.	Have lower or higher standards for cycle parking
<b>1. Regeneration and Land-Use</b>	No significant effect	No significant effect	No significant effect
<b>2. Biodiversity</b>	No significant effect	No significant effect	No significant effect
<b>3. Health and Well-being</b>	<p>Not encouraging additional cycle trips is unlikely to result in health benefits.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this might encourage more cycle trips, resulting in health and well-being benefits there is currently insufficient evidence to support this approach at this stage and would not be a sound approach.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not encourage more cycle trips and therefore there are unlikely to be any health and well-being benefits. Lower standards are not supported by the evidence and are contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards might encourage more cycle trips, improving health and well-being, there is currently no evidence to support this approach and this approach would not be sound.</p> <p><b>Overall positive effect, but not</b></p>

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			<b>sound</b>
<b>4. Equalities</b>	<p>This approach would not encourage additional cycling; especially for those that experience poverty who are the least able to afford a new bicycle if one is stolen. Therefore would not benefit those that are disadvantaged by providing a relatively cheap and flexible form of travel.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this might encourage a greater number of cycle trips resulting in benefits for those that experience poverty and social exclusion, there is currently insufficient evidence to support this approach at this stage and it would not be a sound approach.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not encourage additional cycle trips; therefore people that experience poverty and social exclusion are less likely to have the benefits of cheap and flexible travel. This approach is not supported by evidence and is contrary to the Mayor's ambitions for cycling in London</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards might appear to encourage more cycle trips, there is currently no evidence to support this approach and it would not be sound.</p> <p><b>Overall positive effect, but not sound</b></p>
<b>5. Housing</b>	No significant effect	No significant effect	No significant effect
<b>6. Employment</b>	<p>No increase in cycle trips will have limited effect on employment.</p> <p><b>No significant effect</b></p>	<p>Whilst this might generate demand for additional bicycles and accessories creating retail and servicing jobs and limited manufacturing jobs, there is currently insufficient evidence to support this approach at</p>	<p>Lower standards would not encourage more cycle trips, having limited effect on employment. Lower standards are not supported by evidence and are contrary to the Mayor's ambitions for</p>



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		<p>this stage and it would not be a sound approach.</p> <p><b>Unknown effects and not sound</b></p>	<p>cycling in London.</p> <p><b>No significant effect and not sound</b></p> <p>Whilst higher standard might encourage more cycle trips and therefore employment in the related industries, there is currently no evidence to support this approach and it would not be sound. It is also unclear if increased cycling will displace other employment.</p> <p><b>Unknown effects and not sound</b></p>
<p><b>7. Stable Economy</b></p>	<p>No increase in cycle trips will have limited benefits on road congestion, health costs and jobs relating to cycling.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this would have economic benefits relating to reduced road congestion, reduced health costs and job creation, there is currently insufficient evidence to support this approach at this stage and it would not be a sound approach. It could have a negative impact on development as additional land/space would have to be found for cycle storage.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not encourage more cycle trips, having limited effect on the economy. Lower standards are not supported by evidence and are contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards might encourage more cycle trips and therefore benefit the economy with regards to less congestion and lower health costs, there is currently no evidence</p>

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			to support this approach and it would not be sound. <b>Overall positive effect, but not sound</b>
<b>8. Flood risk and Climate Change Adaptation</b>	No significant effect	No significant effect	No significant effect
<b>9. Climate Change Mitigation and Energy</b>	No increase in the number of cycle trips will have limited benefits on road congestion and a move away from motorised transport and therefore not result in a reduction in greenhouse gas emissions. <b>Overall negative effect</b>	Whilst this approach would have climate change mitigation and energy benefits, there is insufficient evidence to support this approach at this stage and it would not be a sound approach. <b>Overall positive effect, but not sound</b>	Lower standards would not encourage more cycle trips, having limited effects on climate change mitigation. Lower standards are not supported by evidence and would be contrary to the Mayor's ambitions for cycling in London. <b>Overall negative effect and not sound</b>  Whilst higher standards would appear to be beneficial effects for climate change mitigation there is no evidence to support this approach and it would not be sound. <b>Overall positive effect, but not sound</b>
<b>10. Water Quality and Water Resources</b>	No significant effect	No significant effect	No significant effect

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<b>11. Waste</b>	No significant effect	No significant effect	No significant effect
<b>12. Accessibility and Mobility</b>	<p>No increased off-street cycle parking will not alleviate demand for cycle parking, which is often formal on-street provision of other street furniture. The latter can result in obstacles on the footpath.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this approach might result in less congestion on London's roads and on other modes of transport as well as less street clutter, there is currently insufficient evidence to support this approach at this stage and it would not be a sound approach.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not reduce congestion on London's roads or transport modes. It will not reduce street clutter. Lower standards are not supported by evidence and would be contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards would appear to reduce congestion on London's roads and other transport modes and reduce street clutter, there is no evidence to support this approach and it would not be sound.</p> <p><b>Overall positive effect, but not sound</b></p>
<b>13. Built and Historic Environment</b>	<p>No increased provision of off-street cycle parking will not alleviate the demand for cycle parking, which is often formal on-street provision of other street furniture. The latter</p>	<p>Whilst this approach would result in less clutter in the street, improving the built environment, there is insufficient evidence to support this approach at this stage and it would not be a sound approach.</p>	<p>Lower standards would not reduce clutter in the street. Lower standards are not supported by evidence and would be contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative</b></p>

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	<p>results in street clutter and poor visual amenity.</p> <p><b>Overall negative effect</b></p>	<p><b>Overall positive effect, but not sound</b></p>	<p><b>effect and not sound</b></p> <p>Whilst higher standards might reduce clutter in the street, improving the built environment, there is currently no evidence to support this approach and it would not be sound.</p> <p><b>Overall positive effect, but not sound</b></p>
<p><b>14. Liveability and Place</b></p>	<p>No increased provision of off-street cycle parking would not encourage cycling and healthy lifestyles, would not reduce cycle theft and would not reduce street clutter.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this approach might result in liveability, reduced crime and local amenity benefits, there is currently insufficient evidence to support this approach at this stage and it would not be a sound approach.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not improve liveability and amenity or reduce crime. Lower standards are not supported by evidence and would be contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards would appear to reduce cycle theft, support healthy lifestyles and improve local environments, there is no evidence to support this approach and it would not be sound.</p> <p><b>Overall positive effect, but not sound</b></p>
<p><b>15. Open</b></p>	<p>No significant</p>	<p>No significant effect</p>	<p>No significant effect</p>

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Space	effect		
<b>16. Air Quality</b>	<p>No increase in the number of cycle trips will have limited benefits on road congestion and a move away from motorised transport and therefore not result in a reduction in atmospheric emissions.</p> <p><b>Overall negative effect</b></p>	<p>Whilst this approach would have air quality benefits, there is insufficient evidence to support this approach at this stage and it would not be a sound approach.</p> <p><b>Overall positive effect, but not sound</b></p>	<p>Lower standards would not encourage more cycle trips, limiting any benefits to air quality. Lower standards are not supported by evidence and would be contrary to the Mayor's ambitions for cycling in London.</p> <p><b>Overall negative effect and not sound</b></p> <p>Whilst higher standards might have beneficial effects for air quality, there is currently no evidence to support this approach and it would not be sound.</p> <p><b>Overall positive effect, but not sound</b></p>