

FURTHER ALTERATIONS TO THE LONDON PLAN

Integrated Impact Assessment Scoping report

The London Plan

(Spatial Development Strategy for Greater London)

December 2013

FURTHER ALTERATIONS TO THE LONDON PLAN

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Further alterations to the London Plan

Integrated Impact Assessment - scoping report

1. Introduction

1.1 Background

The London Plan

- 1.1.1 The Greater London Authority (GLA) Act 1999 (as amended) requires the Mayor to produce a Spatial Development Strategy (which is generally known as the London Plan) and to keep it under review. The latest London Plan was published on 22 July 2011.
- 1.1.2 During the later stages in the process to adopt the 2011 Plan, the government announced important proposals to change the planning system and land use policy. As it was not possible to include these changes within the Plan, prior to publication a commitment was made by the Mayor to the Secretary of State that the Mayor would bring forward a rapid formal early minor alteration to the new London Plan to address implications of the government's new policy direction.
- 1.1.3 As a result early minor alterations to the London Plan were developed over 2011 and 2012. These are known as the Revised Early Minor Alterations (REMA) to the London Plan. The changes cover:
- the National Planning Policy Framework
 - affordable housing
 - housing for specific groups (service families and gypsies and travellers)
 - changes in health and social care provision
 - cycle parking standards
 - the Community Infrastructure Levy
 - the glossary definition of air quality neutral and heritage assets
- 1.1.4 The Mayor published REMA on 11th October 2013.

Further Alterations to the London Plan

- 1.1.5 The proposed Further Alterations to the London Plan (FALP) covered by this IIA Scoping report do not comprise a full review of the London Plan 2011, as amended by REMA. Therefore not all policy areas will be altered. The proposed FALP cover the most pressing matters identified to support London's growth and the quality of life for Londoners. The FALP have been informed by the Mayor's 20:20 Vision, which sets out the Mayor's priorities for investment in London.

Integrated Impact Assessment

- 1.1.6 The Mayor adopts an integrated approach to assessing the impacts of his strategies, which incorporates the following legal requirements:
- the impact of policies and plans on the environment (meeting the requirements of the Strategic Environmental Assessment (SEA) as set out in the European Directive 2001/42/EC)

- a Sustainability Appraisal (as required by the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment of Plans and Programmes Regulations 2004)
- a Health Impact Assessment (related to the duty to reduce health inequalities as set out in the GLA Act 1999 as amended)
- an Equalities Impact Assessment (meeting the duties under the GLA Act 1999, as amended and the Equality Act 2010)
- a Community Safety Impact Assessment (meeting the duties set out in Section 17 of the Crime and Disorder Act 1998 and the Police and Justice Act 2006).

1.1.7 Carrying out an Integrated Impact Assessment (IIA) enables any synergies and cross-cutting impacts of the assessments to be identified as part of an iterative approach to assessment during policy development.

1.1.8 This Scoping Report has been produced as the first stage of the Integrated Impact Assessment of the FALP. It builds on the scoping report and IIA for the London Plan and the REMA to the London Plan. This Scoping Report (dated December 2013) has been updated following consultation on the original Scoping Report for FALP (dated October 2013).

Strategic Environmental Assessment and Sustainability Appraisal

1.1.9 The Mayor is required to undertake a SEA of any of his plans and programmes that are considered to have significant effects on the environment under the European Directive 2001/42/EC (known as the SEA Directive). The SEA Directive has been transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) which came into force on the 20th July 2004. The purpose of the Directive is to ensure that environmental considerations are integral to the preparation and adoption of the plan or programme.

1.1.10 Sustainability Appraisal (SA) is required under the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment of Plans and Programmes Regulations 2004. It is based on the principles of SEA but is wider in focus and covers the other key considerations of sustainability that concern social and economic issues. The then Office of the Deputy Prime Minister (ODPM)¹ released guidance² for regional and local planning authorities on how to undertake a SA which integrates the requirements for SEA with broader sustainability objectives. The guidance considers that it is possible to satisfy the SA and SEA requirements through a single integrated approach, and it is this approach which has been undertaken to inform the development of the London Plan and its alterations since the Plan was first published in 2004. Additional guidance on the preparation of SEAs and SAs is provided by the Planning Advisory Service on its web-site³ and the draft National Planning Practice Guidance.

Equalities Impact Assessment

1.1.11 The Mayor and GLA have “general public body duties” under equalities legislation and like all public bodies, have statutory duties to promote equality arising from the Equality

¹ Now known as the Department of Communities and Local Government (DCLG).

² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. Office of the Deputy Prime Minister (2005).

³ <http://www.pas.gov.uk/pas/core/page.do?pagelid=152497>

Act 2010. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended).

1.1.12 The Equality Act 2010 has come into force since the preparation of the IIA for the current London Plan. This brings together and replaces all the previous discrimination legislation. The Act contains a new single public sector equality duty (“the Duty”) which brings together the previous race, disability and gender duties and extends coverage to the following:

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

1.1.13 These are the grounds upon which discrimination is unlawful and are referred to as ‘protected characteristics.’

1.1.14 The Duty requires the Mayor and the GLA when exercising their functions to have due regard to the following:

1. **Eliminate unlawful discrimination, harassment and victimisation** and any other conduct which is unlawful under the Equality Act 2010
2. **Advance equality of opportunity** between people who share a protected characteristic, and those who don’t have that characteristic.
This means in particular:
 - a. **Removing or minimising disadvantages** suffered by people who share a protected characteristic that are connected to that characteristic
 - b. **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
 - c. **Encouraging people** who share a protected characteristic **to participate in public life or in any other activity** in which their participation is disproportionately low
3. **Foster good relations** between people who share a protected characteristic, and those who don’t have that characteristic. This means, in particular:
 - a. **Tackling prejudice**
 - b. **Promoting understanding**

1.1.15 Compliance with these duties may involve treating some persons more favourably than others.

1.1.16 A full Equalities Impact Assessment (EqIA) will be included in the IIA of the FALP. This will assist the Mayor to address the requirements of the GLA Act 1999 (as amended) and the Equality Act 2010, including the duty to have due regard in developing the alterations to eliminate unlawful discrimination, advance equality of opportunity and promote good relations. Where required, measures will be incorporated into the further alterations to address these issues. In addition to the baseline information provided in

Section 5 of this report, Appendix 3 sets out a general assessment of the key aspects of equalities consideration and the key issues that are relevant to planning and in particular the FALP.

Health Impact Assessment

- 1.1.17 The Mayor has a duty under the Greater London Authority 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. Therefore the IIA will include an identifiable Health Impact Assessment (HIA), which is the established method of considering health issues in policy development in London.

Community Safety Impact Assessment

- 1.1.18 There is a statutory requirement for the GLA to follow Section 17 of the Crime and Disorder Act 1998. Section 17 places a duty on the GLA to have due regard, when preparing plans and strategies, to the likely effect of these plans and strategies, and the need to do all that it reasonably can, to prevent crime and disorder in its area. The Police and Justice Act 2006 has broadened the scope of Section 17 to encompass misuse of drugs, alcohol and other substances, anti-social behaviour and behaviour adversely affecting the environment. The IIA process will incorporate a specific Community Safety Impact Assessment (CsIA) which will set out how these issues have been considered.

The IIA Report

- 1.1.19 Specific results and outcomes related to health, equalities, and community safety will be clearly documented within the final IIA report. This will allow particular audiences to focus on the impacts they are most concerned about. It will also help the Mayor refine his proposed policies. As with previous revisions or alterations to the London Plan, this approach will build on past assessments that have been undertaken for the London Plan and other Mayoral strategies.

Habitats Regulation Assessment

- 1.1.20 Regulation 48(1) of the Habitats Regulations 1994, which implements Article 6(3) of the Habitats Directive (92/43/EEC) requires an appropriate assessment also known as a Habitats Regulation Assessment (HRA) to be undertaken in respect of any plan or project which:
- a. either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and
 - b. is not directly connected with the management of the site for nature conservation.
- 1.1.21 A separate Habitats Regulation Assessment screening report will be prepared to support the FALP and will be considered in the wider IIA appraisal process.

1.2 Integrated Impact Assessment Scoping

- 1.2.1 This report presents the proposed methodology for carrying out the IIA of the FALP, and builds on the IIA carried out for the London Plan and the REMA to the London

Plan.

- 1.2.2 The purpose of this report is to present information on the proposed scope of the assessment, including:
- An brief overview of the proposed further alterations to the London Plan;
 - An outline of the proposed **approach** to completing the IIA;
 - A review and discussion of **plans, programmes** and **strategies** relevant to the proposed alterations, and the link between them;
 - A summary of key **baseline information**, including any gaps in this information and relating this to the sustainability objectives;
 - Identification of **key issues**, potential **indicators** and potential **alternatives** and relating this to the sustainability objectives;
 - Discussion on the **potential implications of not introducing the proposed policies**;
 - The proposed **objectives** and the **assessment framework** for the IIA; and,
 - Next steps in the process.
- 1.2.3 This scoping report will developed with a range of input across the GLA, including the GLA Diversity and Social Policy Team, TfL Legal and advice from independent consultants appointed by the GLA to prepare the full IIA. The consultants will review a draft of this scoping report and provided feedback to ensure it meets the requirements set out in legislation and guidance on each of the IIA elements.
- 1.2.4 This report aims to provide sufficient information to stakeholders on the proposed approach to the IIA for the FALP. The Scoping Report was first considered by the statutory consultees (Natural England, English Heritage and Environment Agency) for a period of five weeks. A workshop was also held on 25 October 2013 with stakeholders to obtain their opinion on the scope set out for the IIA. The final results of the IIA will then be described in a full IIA report which will be published at the same time as the public consultation for the draft FALP in January 2014. A minimum 12 week public consultation process will be undertaken for both documents when stakeholders and the public will be provided with the opportunity to comment on the IIA Report.
- 1.2.5 The IIA process will take place in parallel to the process for altering the London Plan 2011. It is possible that changes will be made to the draft FALP in light of the responses received during public consultation. Any changes will be taken into account in the IIA process.

2 Overview of the Further Alterations to the London Plan

2.1 The policy areas

- 2.1.1 The proposed FALP are congruent with the vision and overarching philosophy of the 2011 Plan, seeking to accommodate London's growth within its boundaries. As stated above, the GLA Act 1999, as amended requires the Mayor to produce a spatial development strategy (which is generally known as the London Plan) and to keep it under review. Since the publication of the London Plan in 2011 demographic information from the Census has started to be released. This revealed London's population to be larger than had been projected but there is still considerable uncertainty as to the scale and nature of the long term trends. The proposed FALP are to primarily address the short to medium term demographic changes impacting on London's rate of growth and to ensure there are sufficient homes, employment space and infrastructure to support this growth. A fuller policy review maybe necessary once the demographic trends for London and the wider South East become more certain.
The Mayor's 20:20 Vision
- 2.1.2 Following the Olympic Games in the summer of 2012, the Mayor published his 20:20 Vision for London which sets out his priorities for investment in London up to 2020. The Mayor's 20:20 Vision sets out the clear case and prospectus for investment so that London can help drive the rest of the UK economy. The goal of the Vision and investment is the happiness and well-being of Londoners where life expectancy increases, public health improves, the gap is narrowed between rich and poor, improved academic attainment and good quality accommodation for all Londoners. The Mayor wants to lengthen London's current lead as the financial, commercial, cultural, artistic, media, educational, scientific and innovation capital of the world.
- 2.1.3 A large focus is placed on the Opportunity Areas as identified in the London Plan 2011 for their potential to delivery housing and jobs including in any specialist sector of the economy. The Mayor's 20:20 Vision also highlights the need for further investment in transport infrastructure.
- 2.1.4 A key theme of the FALP will be to support housing supply, support the provision of jobs and continue to improve the quality of life for Londoners. At this stage it is intended that the FALP will broadly address:
- population growth
 - housing
 - employment space
 - town centres and retail
 - opportunity areas
 - physical infrastructure
 - social infrastructure
 - design
 - noise
 - waste capacity
- 2.1.5 Minor changes are also proposed to other policies throughout the Plan. Many of these are matters of factual updating or clarification. Appendix 1 scopes which proposed alterations, in their current form are considered to be substantive policy changes and therefore need to be appraised as part of the IIA process. However this could change as

the policies are developed further. Alterations scoped out as not resulting in substantive policy changes include alterations which are factual updates, alterations which reflect changes in legislation or national policy, changes to the supporting text that do not alter the direction of the parent policy.

- 2.1.6 The evidence base for the proposed alterations is still being reviewed and developed. As part of the development of the evidence base some engagement has taken place with key stakeholders. Engagement with various stakeholders will continue throughout the plan making process. This includes with the London Boroughs and with authorities beyond London's boundaries as part of the Mayor's duty to engage and consult on his spatial strategy. Early engagement has also taken place with specialist teams within the GLA such as health, education and housing and external bodies such as the Outer London Commission, the London Sustainable Development Commission, the London Office Review Panel, the Academic Forum and London First.

2.2 The overall objectives

- 2.2.1 The London Plan 2011 sets out the Mayor's vision for the sustainable development of London over the period covered by the Plan. Being an alteration, the FALP will be developed in line with the overall objectives of the London Plan 2011, which will remain the same. The Mayor's vision for the sustainable development is:

Over the years to 2031 – and beyond, London should:

excel among global cities – expanding opportunities for all its people and enterprises, **achieving the highest environmental standards and quality of life** and **leading the world** in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.

- 2.2.2 This high level, over-arching vision is supported by six detailed objectives. These embody the concept of sustainable development.

Ensuring London is:

- 1 **A city that meets the challenges of economic and population growth** in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.
- 2 **An internationally competitive and successful city** with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of – its rich heritage and cultural resources.
- 3 **A city of diverse, strong, secure and accessible neighbourhoods** to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.
- 4 **A city that delights the senses** and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage, and which makes the most of and extends its wealth of open and

green spaces, natural environments and waterways, realising their potential for improving Londoners' health, welfare and development.

- 5 **A city that becomes a world leader in improving the environment** locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 6 **A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities** with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan.

2.2.3 The Plan period will be rolled forward to provide a strategic vision up to 2036.

2.3 Spatial development options

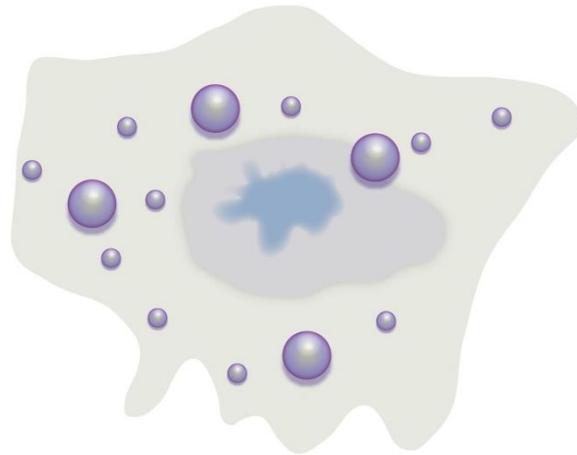
2.3.1 As part of the development of the replacement London Plan 2011 high level spatial development options were developed to assess potential land use alternatives for London. Three strategic spatial development options were considered and developed further to help guide policy development in response to the perceived perception of the lack of focus on outer London by the previous plan. All these options envisaged continued growth largely focused in the central activities zone, however with the following variations for outer London:

- Option 1: Limited growth in Metropolitan Town Centres (as per the London Plan at the time)
- Option 2: Enhanced growth in Metropolitan Town Centres
- Option 3: Enhanced growth in new Strategic Outer London Development Centres

2.3.2 The impact assessment work for the 2011 London Plan, in conjunction with that of the Mayor's Outer London Commission helped to identify the following Option as the most beneficial for growth in London.

- Strategic Spatial Development Option 3: Current London Plan direction plus enhanced growth in new Strategic Outer London Development Centres.

Figure 2.1 Strategic Spatial Development model for London



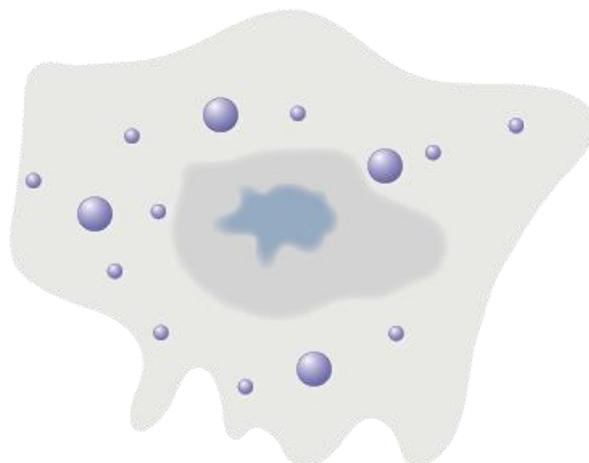
- 2.3.3 For the REMA this preferred spatial option was carried forward, as the proposed alterations had limited spatial influence on the development of London.
- 2.3.4 However, the FALP seek to set the strategy for addressing the population growth suggested by the Census especially in terms of the housing as well as the jobs and infrastructure required to support this growth. Consideration has been given to how this projected significant amount of growth could affect the spatial development of London and therefore spatial development alternatives have been developed.
- 2.3.5 For the FALP, the following alternative spatial options have been considered:
1. Retain the existing spatial development model (2011 London Plan option 3 above) to accommodate London's growth within its boundaries.
 2. Managed strategic release of the Green Belt and/or open land
 3. Growth outside London
 4. Enhanced existing spatial development model (2011 London Plan option 3 above) by bringing forward more sites and increasing density (within the parameters of the existing density policy) based on transport accessibility to accommodate growth within London's boundaries without strategic extensions onto Green Belt/open land.

Appraisal of the spatial development options

1 The existing "Enhanced growth in new Strategic Outer London Development Centres" option

- 2.3.6 This option formed the spatial development strategy of the replacement London Plan 2011. It has informed preparation of the FALP but in its current form cannot accommodate the quantum of growth now expected. The modelling that informed this approach has been refined to better reflect the relationship between public transport accessibility and density and to reflect the housing density that is being delivered across London (see option 4 below).
- 2.3.7 This option has been rejected because:
- in its current form it cannot accommodate the quantum of forecast growth

Figure 2.2: “Enhanced growth in new Strategic Outer London Development Centres” Spatial Development option



2 Managed strategic release of the green belt / open land

2.3.8 This approach was considered as an option as a few boroughs have brought forward through the development plan process local changes to Green Belt boundaries in line with London Plan policy. These have contributed to their new housing provision targets. However, at this stage these changes have not been sufficiently extensive to represent a strategically significant change to the overall approach taken by the London Plan. A paper⁴ by London Councils’ notes that there is a potential for more than 7,875 homes on the green belt within 10 ha of the existing 11 underground and railway stations in the green belt.

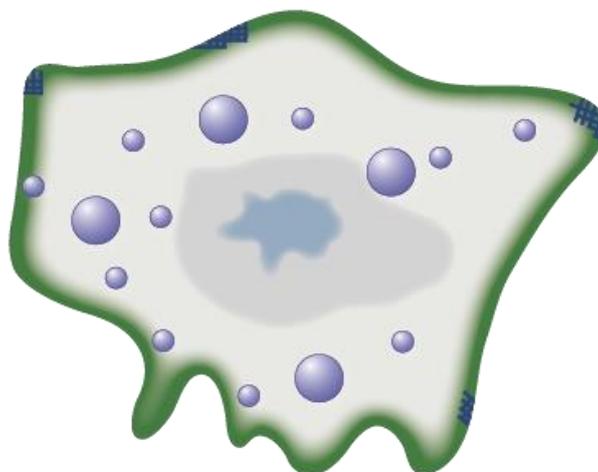
2.3.9 This option has been rejected because of:

- the uncertainty as to whether recent growth pressures will continue over the long term which could mean that the release of greenbelt / open land could be premature and lead to unsustainable forms of development;
- the amount of capacity already within the existing development pipeline⁵ compared to the relatively minor potential identified in the green belt; and
- the potential to secure more sustainable, further development within London’s boundaries without the need for strategically significant extensions into the London’s Green Belt and open spaces. The potential shown by London Councils is minor compared to overall need.

⁴ The London Housing Challenge. A London Councils Discussion Paper. London Councils. 2013

⁵ 198,000 homes as off 31 March 2012 (Annual Monitoring Report 9. GLA. 2013)

**Figure 2.3: 'Managed strategic release of the green belt-open land'
Spatial Development option**



3 Growth outside London

2.3.10 As outlined in the *Introduction* to the London Plan, the Mayor seeks to manage growth to ensure it takes place in the most sustainable way possible - within the existing boundaries of Greater London, and without encroaching on the Green Belt or London's other open spaces. However, historic migration patterns have generally shown some outwards migration beyond London's boundaries.

2.3.11 On-going engagement with authorities beyond London suggests that cumulatively they are not planning to bring forward capacity to address London based housing demand over and above that which can be accommodated through the current London Plan. Indeed there is evidence to suggest that they may be challenged to meet their own endogenous growth. Though the approach adopted in option 4 below seeks to accommodate as much of London's projected growth as possible, it does not completely and mechanistically rule out the possibility that there may be some additional pressure for the wider South East to take some of London's growth in the future. This will especially be the case if demographic and economic trends return to the pre-economic downturn trend of Londoners moving out of London to establish families, or older Londoners moving out of London to realise the equity in their homes. Uncertainty over long term future demographic and economic trends means that there is also uncertainty as to the extent of these pressures. The FALP will seek to resolve this through a commitment to continue to 'plan, monitor and manage' these trends and pressures, which is likely to entail a further alteration to/review of the Plan once the trends become more certain.

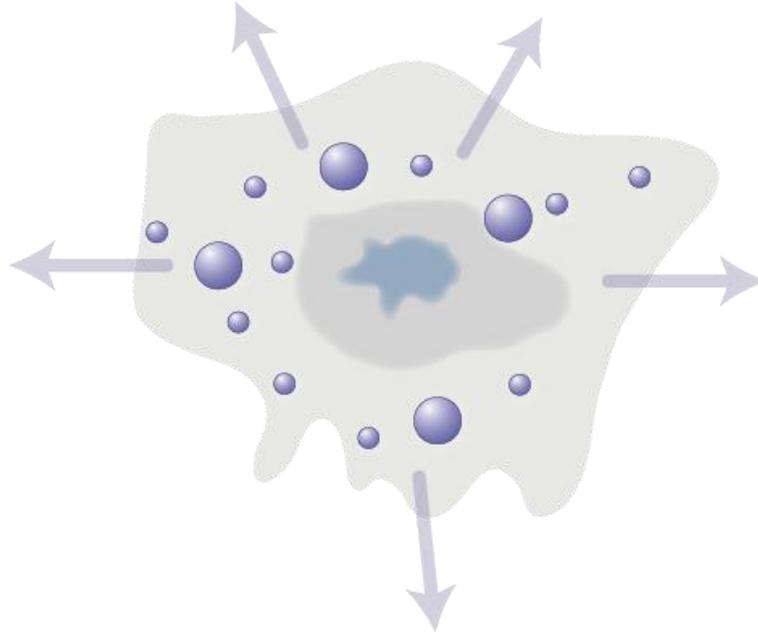
2.3.12 As above this option has been rejected because of:

- the uncertainty as to whether recent growth pressures will continue over the long term which might mean that it could be premature to pursue this option which could lead to unsustainable forms of development;
- the amount of capacity already within the existing development pipeline⁶; and

⁶ 198,000 homes as off 31 March 2012 (Annual Monitoring Report 9. GLA. 2013)

- the potential to secure more sustainable, further development within London's boundaries and without strategically significant extensions beyond London's boundary.

Figure 2.4: 'Growth outside London' Spatial Development option



4 Enhanced existing approach (Existing London Plan option 3 above) to accommodating growth within London's boundaries and without strategic extensions on to London's Green Belt/open land.

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

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

2.3.14 Rather than assuming that the implementation of the density policy should be based simply on the mid-point in the density range for a particular location, this option recognises that densities can vary with the variation in public transport accessibility encompassed within that range. This is a more realistic approach than that taken in the 2011 Plan, and is evidenced by the existing densities that are being delivered. In 2011/12, 40% of all residential units approved were within the density matrix range, 55% were above the range and 5% below the range⁷. For schemes with 15 units or more the percentage of schemes above the density range increases to 60% and those below

⁷ Annual Monitoring Report 9, 2011-12. GLA, 2013

the density range decreases to 3%. The tables (2.1 and 2.2) below show the historic density ranges approved for residential development in London.

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

2.3.16 This option is also prudent and ‘sustainable’ insofar as it more closely reflects the realities of implementation of density policy on a case by case basis. In many cases this has yielded developments which are above the density ranges identified generically for particular locations reflecting the opportunities offered by a more refined consideration of the context of sites. The figures for recent years also reflect improvements in quality of accommodation with the implementation of the Mayor’s Housing Standards. The Mayor will be carrying out further work to investigate the housing capacity of town centres which will support housing delivery as well as the viability and vitality of town centres.

Table 2.1 Residential approvals compared to the density matrix – all schemes

financial year	% of units approvals		
	within range	above range	below range
2004/05	31	62	8
2005/06	28	65	7
2006/07	36	60	4
2007/08	40	55	5
2008/09	41	53	7
2009/10	39	56	6
2010/11	37	58	5
2011/12	40	55	5

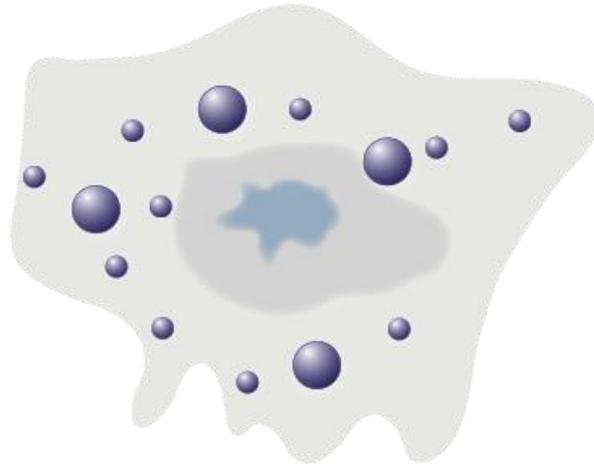
Source: London Development Database

Table 2.2 Residential approvals compared to the density matrix – schemes of 15 units or more

financial year	% of units approvals 15+		
	within range	above range	below range
2006/07	30	69	1
2007/08	36	63	2
2008/09	36	62	2
2009/10	35	63	2
2010/11	31	68	1
2011/12	37	60	3

Source: London Development Database

Figure 2.5: 'Enhanced existing approach' spatial development option



3 The Assessment Approach

3.1 The proposed approach

- 3.1.1 A Sustainability Appraisal, incorporating SEA of the London Plan and its alterations is required by the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment of Plans and Programmes Regulations 2004. The now repealed Government Office for London Circular 1/2008 (Strategic Planning in London) gave guidance on arrangements for strategic planning in London and outlined broad principles that underpin the proposed approach for the IIA. This included that:
- the Mayor should have regard to current Government guidance on good practice for sustainability appraisals; and
 - assessments 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.
- 3.1.2 The Planning Advisory Service has also published advice on SEA and SA of plans. The Government also recently published draft guidance on SEA and SA as part of its draft National Planning Practice Guidance⁸.
- 3.1.3 The guidance on SEA and SA has been reviewed and the Mayor will follow this guidance in the development IIA for FALP. The full approach proposed for the IIA of the FALP is outlined in figure 3.1 below. This is based on the five main stages of SA as described in guidance issued by the ODPM (2005) and the draft guidance on SA published as part of the National Planning Practice Guidance. Previous scoping reports prepared for past London Plans and their alterations and other Mayoral strategy assessments have also been reviewed to refine the approach.
- 3.1.4 The first stage (Stage A) of the SA process involves setting the context and establishing the baseline against which the FALP can be appraised. The key output of this first stage is this scoping report. This report will be developed further with feedback from the statutory and the IIA consultants.
- 3.1.5 The second stage (Stage B) of the SA process involves developing and refining alternatives and assessing their potential effects. This scoping report sets out (in Appendix 2) proposed alternatives which will be further developed and appraised following feedback from the statutory consultees and the IIA consultants. Appendix 2 shows the initial proposed alterations (as scoped out in Appendix 1) and potential alternatives. Both the proposed alterations and the alternatives may change during the appraisal process as the alterations are developed and finalised.
- 3.1.6 The scope of the IIA includes environmental, economic and social issues (including health, equality and community safety) to provide a wide ranging assessment of the potential effects of implementing the amended policies. In order to produce this scoping report, the SA process requires:
- a review of relevant **plans, programmes** and **strategies**, and links between them;

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/what-is-a-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/>

- the collation and analysis of relevant **baseline** information, including any **gaps** in the information;
- the identification of the **key issues**, potential **indicators** and potential **alternatives** that will inform the development of a set of sustainability objectives;
- the potential **implications** of **not introducing** the proposed **policies**; and
- the identification of proposed **objectives** of, and the **framework** to assess the proposed policies.

3.1.7 Whilst both the London Plan and the REMA are relatively new, data from the Census has been released providing more up to date information on London's population. In addition, the Government has introduced significant changes to the planning system, which are on going. Therefore whilst this IIA updates the baseline information, there is uncertainty over further Government announcements regarding the planning system and land use policies as well as funding for homes and infrastructure and their potential impacts. Any further changes announced during this process will be kept under review. This scoping report should be read in conjunction with the IIA for the London Plan⁹ and those for the REMA to the London Plan¹⁰.

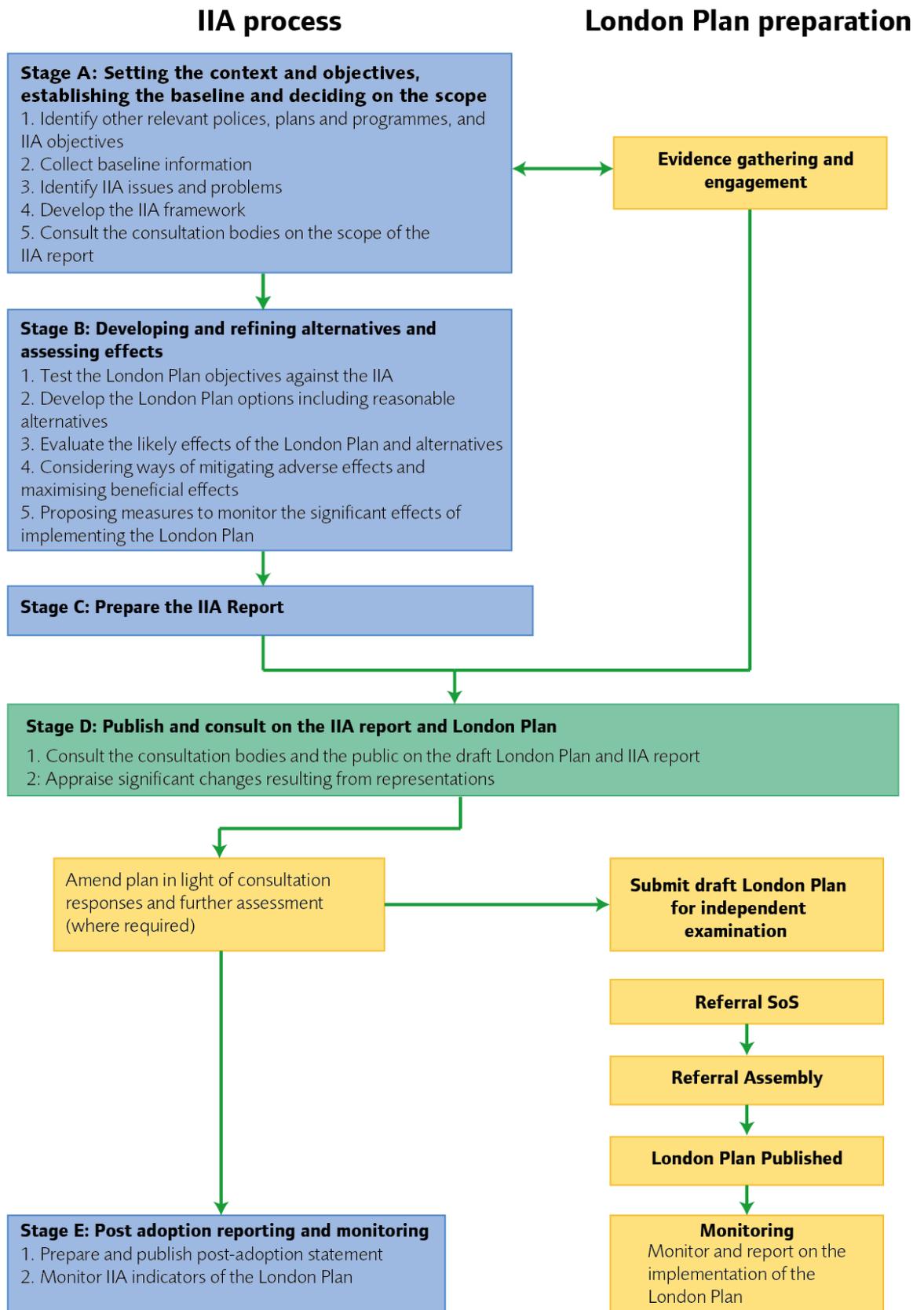
⁹ <http://www.london.gov.uk/shaping-london/london-plan/strategy/download.jsp>

¹⁰ The Scoping report for the Early Minor Alterations to the London Plan (Assembly and Functional bodies version) - <http://www.london.gov.uk/sites/default/files/early-minor-alteration-lp-scoping-report.pdf>

The Early Minor Alterations to the London Plan Scoping report addendum - <http://www.london.gov.uk/publication/early-minor-alterations-london-plan>

Revised Early Minor Alterations Supplementary Integrated Impact Assessment Report, including the Scoping Report - <http://www.london.gov.uk/sites/default/files/supplementary-IIA-LP-REMA-15Jun2012.pdf>

Figure 3.1: The assessment approach



3.1.8 The issues and objectives to be addressed by the IIA are informed by the SEA Directive. Annex I of the SEA Directive states that the assessment should include information on the “likely significant effects on the environment, including on issues such as:

- (i) biodiversity
- (ii) population
- (iii) human health;
- (iv) fauna;
- (v) flora;
- (vi) soil;
- (vii) water;
- (viii) air;
- (ix) climatic factors;
- (x) material assets;
- (xi) cultural heritage, including architectural and archaeological heritage;
- (xii) landscape; and
- (xiii) the inter-relationship between the issues referred to in subsections (i) to (xii).”

3.1.9 In accordance with the SEA Directive, the potential effects that may arise from the implementation of the FALP on each of the relevant issues identified above will be considered as part of the IIA approach (see Sections 5.2 to 5.7).

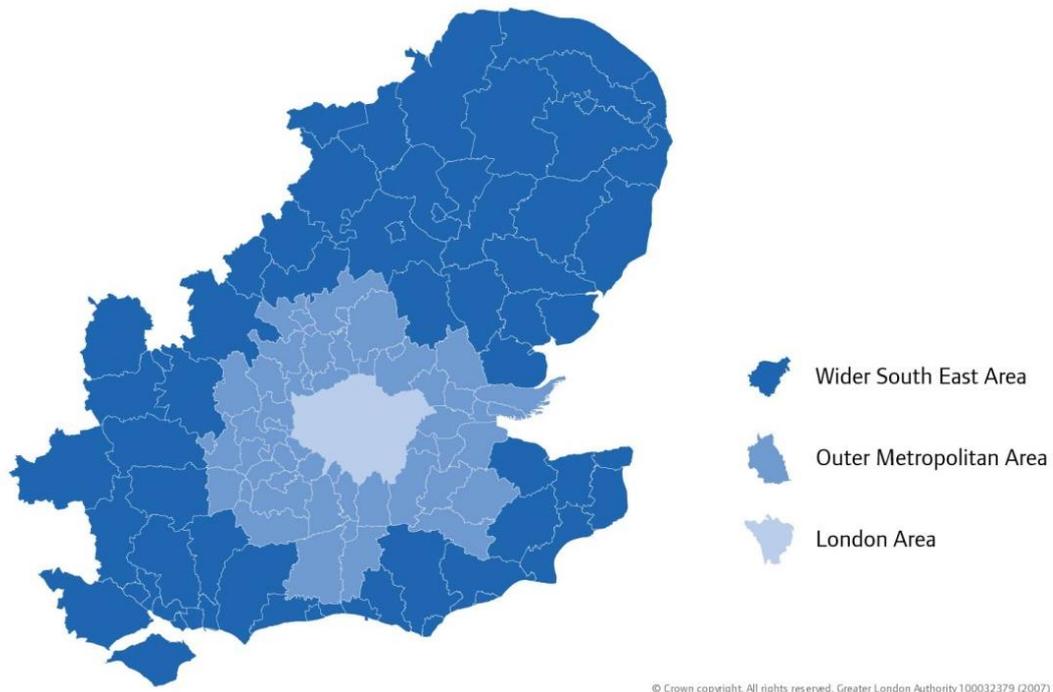
3.1.10 In addition to those issues identified by the SEA Directive, the SA process has been designed to cover wider social and economic issues such as the economy, society, education, skills, transport, equality and diversity. The GLA Act 1999, as amended also requires the GLA to have regard to:

- the effect on the health and health inequality of persons in Greater London;
- economic development and wealth creation;
- social development;
- equality of opportunity;
- the effect on climate change, and the consequences of climate change; and
- the achievement of sustainable development in the United Kingdom.

3.2 Geographic Scope of the IIA

3.2.1 The IIA will assess the potential impacts of the policies comprising the FALP in accordance with the objectives outlined in Table 6.1. The assessment will cover any geographical areas affected by such impacts within Greater London, and if appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions (for example, the outer metropolitan area and the interregional growth corridors). London in the context of the wider South East area is shown in map 3.1.

Map 3.1: London and the wider South East



3.2.2 The key geographic areas within the Greater London boundary are defined by the individual London boroughs (depicted in Map 3.2 below), and the areas of central, inner and outer London as identified in the London Plan (depicted in Map 3.3 below).

Map 3.2: Greater London and London Boroughs



Map 3.3: Central Activities Zone, Inner and Outer London



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Greater London Authority 100032379 (2009)

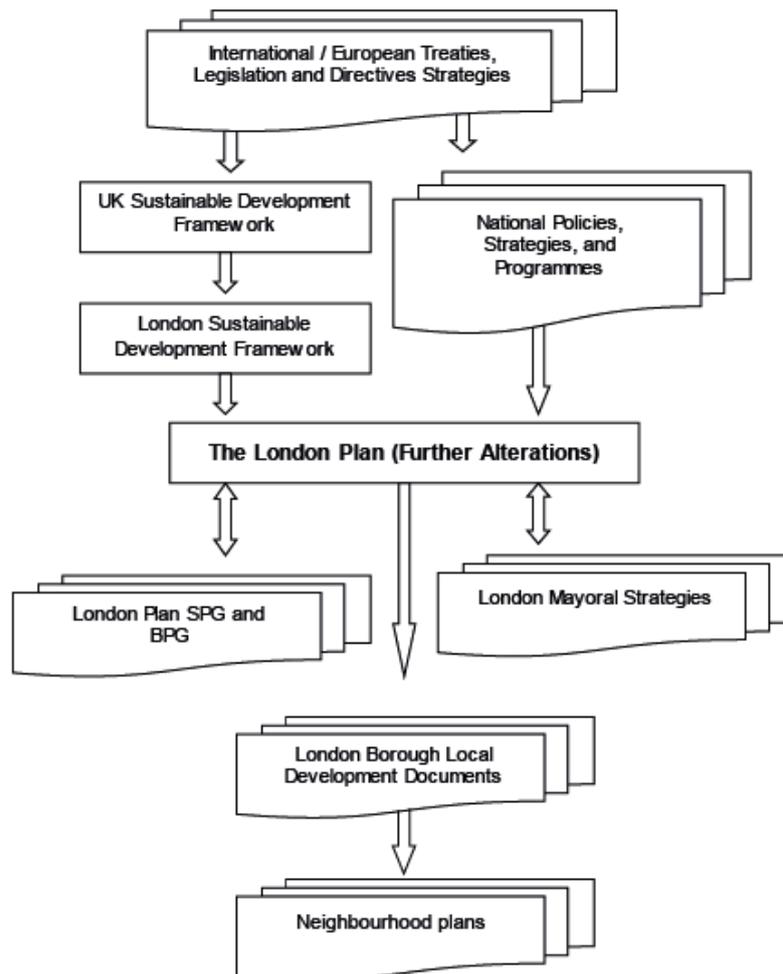
4. Review of plans, programmes and strategies

4.1 Relationship to other plans, programmes and strategies

4.1.1 This section of the IIA scoping report outlines the plans, programmes and strategies that have been reviewed as part of the IIA. This review ensures that the relationship the FALP have with other documents is recognised, and ensures that any relevant environmental protection and sustainability objectives contained within these documents are taken on board as required by the SA/SEA process. Although the documents outlined in Table 4.1 below are not part of the FALP's evidence base, they may also highlight appropriate baseline information and help inform identification of the key sustainability and equality issues. The key issues identified in the SEA Directive (see para 3.1.8) and wider sustainability objectives have been grouped into themes following the layout of the London Plan 2011.

4.1.2 The GLA has already considered a number of documents in the preparatory work for the FALP. However, to meet the IIA's requirements a broad range of documents need to be considered, in particular those international, national and regional documents that are likely to have relevant environmental protection and sustainability objectives. To summarise, the types of documents that influence (and are influenced by) the IIA of the FALP are outlined below in Figure 4.1.

Figure 4.1: Hierarchy of plans and programmes



4.2 Plans, programmes and strategies

4.2.1 The specific plans, programmes and strategies that are relevant to the FALP are listed in the following table.

Table 4.1: Relevant plans, programmes and strategies

Plan, Programme or Strategy
General
Strategic Environmental Assessment Directive 2001
Greater London Authority Act 2007. HM Government (2007)
Greater London Authority Act 1999. HM Government (1999)
The Planning and Compulsory Purchase Act. HM Government (2004)
The Planning Act 2008. HM Government (2008)
The Community Infrastructure Levy. Communities and Local Government (August 2008)
The Community Infrastructure Levy (Amendment) Regulations (2011) and (2012)
Localism Act 2011. HM Government (2011)
The Neighbourhood Planning (General) Regulations. HM Government (2012)
Growth and Infrastructure Act. HM Government (2012)
The National Planning Policy Framework. Communities and Local Government (2012)
National Planning Policy Framework Technical Guidance. DCLG (2012)
Draft National Planning Practice Guidance. Communities and Local Government (2013)
Mainstreaming sustainable development: the government's vision and what this means in practice. Defra (2011)
Securing the future: the UK Government sustainable development strategy. Office of the Deputy Prime Minister (2005)
The World Summit on Sustainable Development - Commitments arising from Johannesburg Summit. United Nations (2002)
Future We Want –Outcome document. UN Conference on Sustainable Development (2012)
A sustainable development framework for London. London Sustainable Development Commission. Greater London Authority (2003)

Plan, Programme or Strategy
General
The London Plan. The Mayor of London (2011)
The Mayor's 20:20 Vision. The Mayor of London (2013)
The Mayor's Supplementary Planning Guidance (various)
Annual Monitoring Report 9. Mayor of London. 2013.
London Plan Implementation Plan 1. Mayor of London. 2013.
Summary <p>These documents set out the international framework for sustainable development. These documents set the legislative and the broad framework for planning and sustainable development in the UK, England and specifically London. The Government has introduced and is introducing further guidance to liberalise and streamline the planning system. Its key document is the National Planning Policy Framework which introduced a presumption in favour of sustainable development.</p> <p>These documents set out the sustainability, legal and policy context for the alterations. In general they promote sustainable development to encourage growth and meet the needs of the local population.</p>

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

London's Places
Planning for schools development: statement. DCLG (2011)
Borough Development Plan Documents (various)
Opportunity Area Planning Frameworks (various)
<p>Summary</p> <p>The Government has introduced and is introducing further guidance to liberalise and streamline the planning system in order to stimulate town centres and encourage economic growth as well as increase the supply of housing. There is a current strong focus on improving struggling town centres and high street, including by perhaps encouraging more housing.</p> <p>The Mayor and the London Boroughs play a strong role in shaping their areas through borough development plan documents, and the Mayor through plans for opportunity areas, that are produced in conjunction with the relevant borough.</p> <p>These documents support the alterations through their support for shaping places to meet local demand and encourage regeneration. There has been strong recent focus on 'saving the High Street' and the proposed alterations also seek to ensure the proactive management of town centres, including through consolidation of existing floorspace and the delivery of housing both in Inner and Outer London.</p> <p>The London Strategic Housing Land Availability Assessment and London Strategic Housing Market Assessment which inform the number and type of housing required across London are being updated to inform the FALP.</p>

London's People
GLA Population Projections 2012 Round, Trend Based, Borough SYA. GLA (December 2012)
2011 Mid-Year Population Estimates. GLA (September 2012)
London Housing Strategy – draft for consultation. GLA (2013)
London Housing Strategy. GLA (2010)
Housing in London: the evidence base for the London Housing Strategy. Greater London Authority (2012)
Housing Standards Review Consultation. DCLG (2013)
Housing Standards Review: Towards more Sustainable Homes. DCLG (2013)
Greater London Strategic Housing Market Assessment 2008. Greater London Authority (2009)

London's People
Mayor's Housing Investment Taskforce Report. Great London Authority (2011)
Affordable Homes Programme Framework. Homes and Communities Agency, February 2011
London Assembly Planning & Housing Committee. Crowded houses. Overcrowding in London's social rented housing. GLA (2011)
Making London better for all children and young people: the Mayor's children and young people's strategy. Greater London Authority (2004)
Migration Indicators: June 2013. GLA (2013)
The London Plan: Ethnic Group Population Projections GLA (2010)
Planning policy for traveller sites. CLG (2012)
<p>Summary</p> <p>These documents provide the national and London framework for housing development, including affordable housing, as well as housing investment and ways of delivering more housing.</p> <p>These data and documents provide the evidence base to inform the growth that the alterations will have to plan for both in terms of overall population growth, types of population growth, specific needs of the local population as well as the projected number and types of homes required and supporting infrastructure.</p> <p>These documents support the alterations by providing guidance on how to address and plan for housing demand, including the types of housing that are required over the lifetime of the Plan, whilst ensuring policies are viable and deliverable. They promote high quality sustainable housing which is an essential part of the alterations given that housing in London tends to be delivered at a higher density.</p>

London's Economy
London's Economic Outlook: Spring 2013, Great London Authority (2013)
Raising the capital. London Finance Commission (2013)
Jobs and Growth Plan for London. GLA (2013)
Understanding the demand for and supply of visitor accommodation in London to 2036. GLA (2013)
London's Low Carbon Market Snapshot – 2013. London's Low Carbon and Environmental Goods and Services - Updated Report. K Matrix (2013)
Public Spending Priorities in London. GLA (2010)

London's Economy
London Labour Market projections. GLA (2013)
Labour Flows in London. GLA (2011)
Barriers to Housing Delivery. GLA (2012)
London Office Policy Review 2012. Ramidus Consulting Limited with Roger Tym & Partners (2012)
London industrial land demand and release benchmarks. Roger Tym & Partners with Jones, Lang LaSalle (2011)
London Industrial Land baseline URS, DTZ (2010)
The Mayor's Economic Development Strategy for London, Greater London Authority (2010)
PayCheck 2010. Greater London Authority (2010)
More residents, more jobs? The relationship between population, employment and accessibility in London. Greater London Authority (2005)
Regeneration, competitiveness and sustainable development. Greater London Authority (2004)
Delivering Power: The Future of Electricity Regulation in London's Central Business District. South East Economics and Stephen Jones Associates. (2012)
London Electricity High-level Working Group, Meeting papers. 2012-2013
Simplification Plan 2012-2013 Ofgem (2012)
Find out how we're keeping your lights on...Our Plan for 2015 – 2023. UKPN (2013)
<p>Summary</p> <p>These reports provide an update on the economic conditions and forecasts for London. They provide an important understanding of how much employment space and what type of employment will be required in London. They also outline the needs of the range of industries in London.</p> <p>These documents support the alterations by identifying how much employment and retail floorspace is required. They also set out the changing demands by the various office and retail sectors, encouraging some flexibility and a proactive approach to planning for employment and retail floorspace.</p>

London's Response to Climate Change
UK Climate Projections 2009. DEFRA (2010)

London's Response to Climate Change
Changes to Part L of the Building Regulations. DCLG (2013)
Planning practice guidance for renewable energy. DCLG (2013)
The Carbon Plan - reducing greenhouse gas emissions. DECC (2013)
The future of heating: a strategic framework for low carbon heat. DECC (2012)
Next steps to zero carbon homes: allowable solutions. DCLG (2013)
Zero-carbon non-domestic buildings: phase 3 final report. DCLG (2011)
Energy Act. HM Government (2011)
Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy. GLA (2011)
Evidence Base: Climate Change in the Further Alterations to the London Plan. Greater London Authority (2007)
Microgeneration strategy. DECC (2011)
Energy Planning- Monitoring the impact of London Plan Energy Policies in 2010. GLA (2011)
Cutting the Capital's Carbon Footprint - Delivering Decentralised Energy. London First, Buro Happold (2008)
Impact of London Plan on Energy Policies. South Bank University (2009)
District Heating Manual for London. GLA (2013)
London Decentralised Energy Capacity Study – Phases 1, 2, 3. GLA (2011)
RE:FIT. Mayor of London (ongoing)
RE:NEW. Mayor of London (ongoing)
DEPDU Programme. Mayor of London (ongoing)
The Green Deal. Government Programme (ongoing)
The Water Framework Directive. European Commission (2000)
The Floods and Water Management Act. HM Government (2010)
Water stressed areas: 2013 classification. Defra & EA (2013)

London's Response to Climate Change
Catchment Based Approach: Improving the quality of our water environment. Defra (2013)
Thames Estuary 2100 (TE2100). Environment Agency (2012)
National policy statement for waste water. Defra (2012)
UK marine policy statement. Defra (2011)
The marine planning system for England. Defra (2011)
Thames Tunnel: strategic and economic case, costs and benefits. Defra (2011)
Surface water management plan technical guidance. Defra (2010)
Water for people and the environment - Water resources strategy for England and Wales. Environment Agency (2009)
Water for life and livelihood. River Basin Management Plan Thames River Basin District. Environment Agency (2009)
Securing London's water future: The Mayor's Water Strategy. GLA (2011)
The London Catchment Abstraction Management Strategy. Environment Agency (2006)
The Thames Corridor Catchment Abstraction Management Strategy. Environment Agency (2006)
Making space for water: taking forward a new government strategy for flood and coastal erosion risk management in England. DEFRA (2005)
Thames Catchment Flood Management Plan. Environment Agency (2008)
The London rivers action plan. The River Restoration Centre. (2009)
Draft Water Resources Management Plan. Thames Water (2013)
Affinity Water. Our Plan for Customers & Communities. Draft Water Resources Management Plan. (2013)
Drain London Programme. GLA (ongoing)
Ramsar Convention on Wetlands of International Importance, especially waterfowl habitat (1971)
Bern Convention on the Conservation of European Wildlife and Natural Habitats. European Community (1979)
Bonn Convention on Conservation of Migratory Species. United Nations (1979)
Directive on Conservation of Wild Birds. European Commission (1979)

London's Response to Climate Change
Habitats Directive 1992
Conservation of Natural Habitats and Wild Fauna and Flora (the Habitats Directive). European Commission (1992)
The Natural Environment and Rural Communities Act (2006)
Wildlife and Countryside Act (1981)
Habitats and Wild Birds Directives: Simplification of guidance in England. Defra (2012)
Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Defra (2011)
Working with the grain of nature: a biodiversity strategy for England. DEFRA (2002)
Development Plan Policies for Biodiversity: Best Practice Guidance of The London Plan. Greater London Authority (2005)
Connecting with London's nature: the Mayor's biodiversity strategy. Greater London Authority (2002)
London's Biodiversity Action Plan. London Biodiversity Partnership (Ongoing)
Waste Framework Directive 2008
The Landfill Directive. European Commission (1999)
The Landfill (England and Wales) Regulations (2002)
Updated national waste planning policy: planning for sustainable waste management - consultation. CLG (2013)
Local Authority Collected Waste Generation from 2000/01 to 2011/12 (England and regions data). Defra (2013)
Local Authority Collected and Household Waste Statistics 2011 to 2012. Defra (2013)
Commercial and Industrial Waste Survey 2009. Final Report. Jacobs, Defra (2010)
Waste Strategy for England. DEFRA (2008)
Making Business Sense of Waste: The Mayor's Business Waste Management Strategy. GLA (2011)
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy. GLA (2011)
Managing risks and increasing resilience: the Mayor's climate change adaptation strategy. GLA (2011)
Greenhouse Gas Calculator for Municipal Waste. User Manual. SLR for GLA (2011)

London's Response to Climate Change
Capital Clean-up Programme. Mayor of London. (Ongoing)
State of the Environment report for London. Greater London Authority, Environment Agency, Natural England, The Forestry Commission (2011)
Stern Review - The Economics of Climate Change. Chancellor of the Exchequer (2006)
Rio Earth Summit, Agenda 21, Chapter 9: Protection of the atmosphere. UNCED (1992)
The UN Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol. United Nations (1999)
<p>Summary</p> <p>These documents represent the wide variety of international, European and UK laws and agreements on different aspects of the environment, including nature conservation. The reports and programmes on energy and carbon dioxide indicate the wide range of work the Government and the Mayor are doing to ensure appropriate energy infrastructure, reduce carbon dioxide emissions, retrofit energy efficiency measures which in turn have wider benefits such as improved air quality, better internal environmental and addressing fuel poverty.</p> <p>There are numerous reports on the water environment including ensuring London has an adequate water supply and the existing supply is used wisely, preventing flooding from all sources and improving water quality.</p> <p>The documents also outline strategies and measures to address pollution including air, water, light and waste to protect the environment and health.</p> <p>These documents support the proposed alterations by setting out the revised waste projections and setting out a framework for the provision of infrastructure. There are limited proposed alterations to the Climate Change policies in the Plan.</p>

London's Transport
Aviation policy framework. Department of Transport (2013)
Delivering a Sustainable Transport System. Department for Transport (2006)
Towards a Sustainable Transport System: Supporting economic growth in a low carbon world. Department for Transport (2006)
Eddington Transport Study – Advice to Government. Department of Transport (2006)
Mayor's vision for cycling. GLA (2013)
Safeguarded Wharves Review. Final Recommendation. Mayor of London. 2013.
River Action Plan. Mayor of London, TfL. 2012

London's Transport
Cycling Revolution London. TfL (2010)
Town centre study. TfL (2011)
A new airport for London – Part 1 and Part 2. GLA (2011)
The Right Direction. The Mayor's strategy to improve transport safety and security 2010-2013. Great London Authority, 2011
Mayor's Transport Strategy. GLA (2010)
Travel in London. Report 3. Transport for London (2010)
Transport for London Business Plan 2009/10 – 2017/18. Transport for London (2009)
Cycle safety action plan 2010. Transport for London (2010)
Residential Parking Provision in New Developments Travel in London Research Report. TfL (2012)
The relevance of parking in the success of urban centres. A review for London Councils. Sophie Tyler, Giles Semper, Peter Guest & Ben Fieldhouse (2012)
Summary <p>These reports and strategies set out national policies and the Mayor's priorities with regards to transport. They provide baseline information on transport.</p> <p>These documents support the alterations as they set out the Mayor's ambitions and priorities for cycling in London as well as large scale infrastructure required to support sustainable growth.</p>

London's Quality of Life
Sustainable communities Act 2007. HM Government (2007)
Mixed communities initiative. DLCC (2011)
Air Quality Framework Directive. European Commission (1996)
Draft noise action plans. Defra (2013)
Sounder city: the Mayor's ambient noise strategy. Greater London Authority (2004)
The air quality strategy for England, Scotland, Wales and Northern Ireland. Working together for clean air. DETR (2000)
Air pollution in the UK 2011. Defra (2012)

London's Quality of Life
Mayor's Air Quality Strategy. GLA 2010
Ancient Monuments and Archaeological Areas Act (1979)
The Planning (Listed Buildings and Conservation Areas) Act. HM Government (1990)
World Heritage for the Nation: Identifying, Protecting and Promoting Our World Heritage. Department for Culture, Media and Sport (2010)
Heritage Protection for the 21st Century: White Paper. Department for Culture, Media and Sport (2008)
Heritage Counts 2012. English Heritage (2012)
London view management framework: supplementary planning guidance. Greater London Authority (2011)
Capital Values: the Contribution of the Historic Environment to London. London Historic Environment Forum (2006)
Mayor's Cultural Strategy. GLA (2010)
Countryside and Rights of Way Act (2000)
A sporting future for London. Great London Authority, 2009
London's Great Outdoors Programme. Mayor of London (ongoing)
Capital Growth Programme. Mayor of London. (ongoing)
The Mayor's food strategy. Greater London Authority (2006)
The London Health Inequalities Strategy GLA (2010)
Joint Strategic Needs Assessments and Joint Health and Wellbeing Strategies – statutory guidance. Department of Health (2013)
Fair London. Healthy Londoners? London Health Commission (2011)
Mayor of London. Takeaways Toolkit. GLA (2012)
Health: Children and Young People. Meeyin Lam and Allan Baker, London Health Observatory. (2010)
Childhood Obesity in London. GLA (2011)
Young Londoners – Successful Futures: The Mayor's renewed agenda for children and young people. Great London Authority, 2010
Lifetime neighbourhoods. DLCC (2011)

London's Quality of Life
Do the Maths: Tackling the Shortage of School Places in London, London Councils (2013)
Mayor's Education Inquiry Report and Mayor's Response to Report. (2012)
Academies Act 2010. Department of Education, 2010
Valuing Older People: the Mayor's Older People Strategy. Greater London Authority (2006)
Summary of Social Trends 2008. GLA (2008)
Regeneration, competitiveness and sustainable development. Greater London Authority (2004)
Poverty: The Hidden City. Rachel Leaser, GLA (2011)
Poverty figures for London 2011/12. GLA (2013)
Equal Life Chances for All. The Mayor's Equality Framework. GLA (2012)
Mayor's Annual Equality Report 2011/2012. GLA (2013)
London Legacy Development Corporation. Inclusive Design Strategy. LLDC (2012)
London Legacy Development Corporation, Inclusive Design Standards. LLDC (2013)
Annual London Survey 2011. GLA (2011)
Planning (Hazardous Substances) Act 1990. HM Government 1990.
PADHI. (Planning Advice for Development near Hazardous Installations) HSE's land use planning methodology. Health and Safety Executive. 2012
<p>Summary</p> <p>These strategies promote improvement in various areas that will lead to the improvement in the quality of life for Londoners, including air quality, health, sport, equality, education, high quality housing.</p> <p>These documents support the alterations by setting out the priorities for social infrastructure to ensure growth is sustainable and designed to a high quality.</p>

4.3 Overall link of the proposed policy changes on wider plans, programmes and strategies

4.3.1 This section sets out how the proposed policy changes relate to wider national and London plans, programmes and strategies.

Housing

- 4.3.2 National planning policy requires the FALP to address the need for housing and broadly identify where and how it will be delivered. The 2011 Census provides an updated baseline for London's population and its make-up. Population and housing projections have been developed taking this into account; however beyond the short to medium term, there is considerable uncertainty over the likely outturn of these projections. This is partly because there has been a recent trend in internal migration of less outmigration from London compared to the historic trend. Other unknown factors include whether the significant growth in the older aged population will remain in London or follow historic trends and migrate out of London. Housing costs, household size and provision of jobs outside London are also influencing factors. The London Strategic Housing Land Availability Assessment, the London Strategic Housing Market Assessment, the Mayor's Housing Strategy and investment programme provide more detail on the type of housing needed and how and where it will be delivered. Further, the effects of national welfare reforms have not fully been realised. How household dependent on these benefits react to these changes will also have a bearing on the type of housing required, where it is needed and at what cost.
- 4.3.3 National policy has also liberalised the planning system to enable the change of use from office to residential without the need for planning permission. This may be extended to town centres and retail uses. Whilst this approach may deliver additional homes, there is no control over the quality and type of homes delivered. If the approach is extended to town centres, there is concern that it will limit the ability for a strategic review of retail demand and therefore the potential for the delivery of significant numbers of homes within town centres through intensive mixed use redevelopments.
- 4.3.4 Housing policy has a significant influence on the demand for other services, especially social services, places a demand on physical infrastructure and has a strong bearing on people's health and quality of life. House building and mobility in the housing market provide benefits to the wider economy. Given the higher densities that housing in London tends to be delivered at, the FALP seek to ensure housing is built to secure and high levels of amenity and sustainability.
- 4.3.5 The delivery of infrastructure, especially transport infrastructure will have a significant influence on the delivery of housing, and in particular where housing is delivered. Not only does improved transport infrastructure make an area more accessible, but the increase in land values can make the delivery of housing and its wider supporting infrastructure viable. Delivery of transport infrastructure is largely dependent on national, London and local policies and funding.

Employment policies

- 4.3.6 The employment data informs and provides projections for the number and types of jobs that will be required and provided in London. It identifies absolute employment growth for London but decline in some sectors. National planning policy aims to ensure sufficient employment space is provided over the plan period. However there are also national policies that are allowing the uncontrolled loss of office space in a large proportion of London.
- 4.3.7 Given the diverse skills base of the population it is essential a wide range of jobs are provided, including local jobs that can meet local demand for services. In addition to the

Mayor's schemes, many boroughs have local training and skills programmes to support local employment.

- 4.3.8 As per housing delivery the provision of transport infrastructure has a significant influence on the location of jobs and the types of jobs provided. Delivery of transport infrastructure is largely dependent on national, London and local policies and funding.

Town centres and retail space

- 4.3.9 There are significant changes forecast for town centres and high streets reflecting changes in consumer behaviour. There have been several national reviews into the 'High Street' and town centres. These have recommended a more flexible approach to land use planning in town centres to secure their long term viability. This has been supported by the Government through changes in national policy to enable certain changes of use without the need for planning permission. However, there is concern that this approach could result in the loss of retail floorspace that provides community benefits such as pubs or leads to the concentration of less desirable town centre uses associated with anti-social behaviour and deprivation such as betting shops and pay day loan companies. At a national level there is also support for the liberalisation of car parking policies in town centres. The potential for this in outer London is being reviewed as part of the alterations to policies on outer London.
- 4.3.10 National policy on land uses in town centres may be liberalised further to allow a change of use to housing without the need to obtain planning permission. In London, it is considered that there is potential for town centres to accommodate additional higher density housing. There is concern that a liberal, unplanned approach to change of use to housing will give rise to pepper-pot changes of use instead of a consolidated review and delivery of more significant amounts of housing.

Opportunity and Intensification areas

- 4.3.11 Opportunity and intensification areas are areas in London identified as having significant potential to deliver homes and jobs. Most are significant areas of brownfield land associated with previous industrial and transport uses. Some stem from the opportunity created by new regional and national transport infrastructure either proposed or being delivered such as Crossrail2 and HS2. Others have the ability to attract significant investment to fund the required infrastructure due to their central location. Some will require more support (both coordination and infrastructure) if they are to be delivered.
- 4.3.12 These areas will play a vital role in shaping London over the Plan period and delivering a large proportion of London's housing and employment demand. Given the likely densities to be delivered in these emerging areas, it is essential the London Plan policies and wider policies, especially of social infrastructure providers are applied as a whole to ensure a high standard of development to delivery places that enable a high quality of life.

Social infrastructure

- 4.3.13 There are significant changes taking place to the funding and delivery structures of many social infrastructure providers including the health and police service as well as those delivered by local authorities. The recent increase in population is already creating

additional demand for many of these services including schools and the health service. The alterations will need to consider the increasing demand for these services as well as the change in the way these services are provided, including the type of building / floorspace, multi-functional spaces and on going funding and management.

- 4.3.14 A level of protection, improvement or consolidation will still be required to ensure sufficient space is provided for these services to meet the growing demand. Given the growing demand for housing, it is likely the pressure on these spaces from higher value land uses will continue. Communities now have the opportunity to register any locally significant land uses as a 'community asset' under the Localism Act 2011, and this designation is being considered as a 'material consideration' by planning authorities.

Physical infrastructure

- 4.3.15 Physical infrastructure is essential to support the growth identified by the plans, programmes and strategies above. The promotion of London's infrastructure planning and delivery is an important theme of the Mayor's 2020 Vision. He considers that there is scope for improvement and intends to take a leading role in working collaboratively with the public, private and third sectors in London as well as with partners beyond its geographical boundaries to realise such improvements. A wide and complex range of stakeholders are involved in infrastructure planning, funding and implementation. The regulatory frameworks applied by the different regulators to determine infrastructure funding can have a significant impact on development. The Key Diagram in the London Plan 2011 notes the large scale transport infrastructure projects that are being or are likely to be delivered across London. There have been announcements for support in further transport infrastructure in London such as HS2, an extension to the Northern line and Crossrail 2. In addition the Mayor supports further infrastructure to support cycling across London.

- 4.3.16 The Mayor has also launched his 'Smart London' initiative¹¹ to promote the exploitation of new technologies, which will over time provide opportunities to make London's infrastructure more efficient and mitigate the impacts of demand growth. He has established a high level electricity working group to secure a resilient electricity network in London that is able to deliver connections and capacity timely and cost-effectively to ensure that London can compete with other world cities in terms of access to electricity supply and support for development and business growth where and when it is required. The Mayor has also applied to Ofgem for a new type of electricity supply licence which would enable the GLA to initially buy excess electricity produced by London's boroughs and public bodies before selling it on, at cost price, to other public sector organisations, such as Transport for London, the Met Police and NHS hospitals. If the scheme proves successful the Mayor plans to extend it to include private sector energy producers in London as well. Increasing revenues for smaller generators will improve the viability of local energy projects in London and spark an investment boom in the capital's low carbon energy infrastructure. In the short term, it could help bring in more than £300 million worth of investment for 22 heat and power projects already in the pipeline. In the longer term, it could help generate over £8 billion of investment and around 850 jobs a year until 2025.

¹¹ For details please see <http://www.london.gov.uk/priorities/business-economy/vision-and-strategy/smart-london>

- 4.3.17 Thames Water has set out their draft Water Resource Management Plan which sets out how it will ensure an adequate water supply to its parts of London up to 2050, and it is progressing with its Thames Tideway Tunnel. The Environment Agency has published a plan which sets out the strategic direction for managing flood risk in the Thames estuary to the end of the century and beyond.
- 4.3.18 Based on a recommendation by the London Finance Commission a long-term Infrastructure and Capital Investment Plan for London is being prepared, which will set out London's infrastructure needs and explore funding opportunities.

Design

- 4.3.19 The Localism Act 2010 and the NPPF support neighbourhood planning. The Mayor has been developing supplementary planning guidance to support his existing London Plan policies on neighbourhood planning and design at the community scale. Design should enable the flexible use of places and spaces by people over their lifetime. This approach is supported by many wider policy and guidance documents including those on lifetime homes, designing for accessible environments, designing for safe and secure environment. This is encompassed by the CABE and the National House Builders Federation's guidance and assessment tool, Building for Life. The proposed alterations seek to incorporate these principles into London Plan policy.

Noise

- 4.3.20 The Noise Policy Statement for England sets out the policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion. It sets out that all forms of noise including environmental noise, neighbour noise and neighbourhood noise should be considered and notes the links between noise and health and quality of life.
- 4.3.21 The NPPF states that planning policy should avoid the generation or exposure to noise, and where this is not possible to ensure its adverse effects are mitigated.
- 4.3.22 Londoners can have exposure to higher levels of noise given the density of development resulting in people living closer to each other, busier roads and the amount of plant. The proposed alterations will seek to update the existing approach to protect Londoners from noise pollution

Waste

- 4.3.23 The Department for the Environment, Food and Rural Affairs (Defra) produced new statistics for the likely generation of waste in the future. However the methodology does not suit the circumstances in London. Therefore, new waste projections for London will be developed using Defra's new national waste statistics but using the GLA's existing methodology for waste projections in London. The projections will take into account the population and business projections. This will support the Mayor and the boroughs meet the requirements of Planning Policy Statement 10 – Planning for Waste.
- 4.3.24 The inclusion of a carbon performance criteria is also in line with the 'waste hierarchy' set out in national guidance and will contribute to London meeting the Mayor's carbon

dioxide reduction target set out in his Climate Change Mitigation and Energy Strategy and the London Plan.

4.4 Potential implications of not introducing the policy

- 4.4.1 The SEA Directive seeks an assessment of the likely evolution of a policy area from the current situation without the implementation of the proposed plan, programme or policy alterations. The potential implications of not introducing the proposed policy changes have been informed by the baseline information and consideration of the wider plans and programmes and policy changes at national level.

Housing

Table 4.2: Potential implications of not introducing the housing policies

Theme	Potential implications of not altering the housing policies
London's Places	The boroughs may not reflect the need for housing in their Local Plans, potentially limiting or delaying the identification of land for housing and its subsequent delivery. The boroughs may not identify the potential of their town centres for higher density housing development, limiting the delivery of housing. Less housing in town centres would not enable an increased population to support the vitality and viability of town centres.
London's People	The boroughs may not identify the full need for housing in their areas potentially limiting its delivery, including specialist types of housing. It would be less likely housing will be delivered to the quality outlined in the alterations. The lack of appropriate housing delivery can have negative impacts on the quality of life.
London's Economy	The opportunity to intensify in town centres may be missed which could result in a lost opportunity to modernise/ redevelop commercial and community space and also a lower increase in population in town centres to support their vitality and viability. The potential lack of housing delivery can have negative effects on the construction sector of the economy.
London's Response to Climate Change	Not having an adequate housing supply to meet need could result in the loss of appeals, including potentially for housing developments in unsustainable locations such as on the greenbelt or areas with a low PTAL resulting in additional air pollution. It would be less likely housing will be delivered to the environmental quality outlined in the alterations. The outcomes of the HRA and RFRA could influence the location of housing development or require mitigation measures.
London's Transport	Not having an adequate housing supply to meet need could result in the loss of appeals, including potentially for housing developments in unsustainable locations that could rely more heavily on less sustainable modes of transport, increasing congestion.
London's Quality of Life	The potential lack of housing delivery could result in overcrowding, housing that is not affordable and housing that is located a long distance from people's work place. This would have a negative effect on Londoner's quality of life, health and

	potentially equalities across London.
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Employment

Table 4.3: Potential implications of not introducing the employment policies

Theme	Potential implications of not altering the employment policies
London's Places	Not updating the employment projections and ensuring appropriate and potentially flexible employment floorspace is planned for could result in insufficient employment floorspace being provided, in the long term effecting London's international and UK competitiveness.
London's People	There would be the potential for insufficient or inappropriate employment floorspace to be planned for which could result in fewer jobs or inappropriate jobs being provided.
London's Economy	This could result in insufficient or inappropriate employment floorspace be provided, in the long term effecting the general functioning of London and its international and UK competitiveness.
London's Response to Climate Change	In the long term this could result in employment floorspace being provided in unsustainable locations, including some distance beyond London, requiring access by unsustainable modes of transport.
London's Transport	In the long term this could result in employment floorspace being provided in unsustainable locations, including some distance from London placing additional demand on transport infrastructure.
London's Quality of Life	This could potentially result in the insufficient provision of jobs and the variety of jobs that people need affecting their ability to improve their quality of life. Longer travelling distances, especially by unsustainable modes of transport could result in poorer air quality.

Town centres and retail

Table 4.4: Potential implications of not introducing the town centres and retail policies

Theme	Potential implications of not altering the town centres and retail policy
London's Places	Not encouraging the proactive management of retail floorspace, and where appropriate, some release of retail floorspace for higher density housing could result in a poorer quality and inefficient town centre with shop vacancies and less provision of housing to meet overall demand.
London's People	This could limit the delivery of housing in town centres limiting London's ability to meet its overall housing demand.
London's Economy	This could result in underutilised floorspace in town centre which would be detrimental to its vitality and viability.

London's Response to Climate Change	The inefficient use of land in town centres is likely to place pressure on other land, perhaps in less sustainable locations such as those with a lower PTAL or in the greenbelt to deliver housing and other land uses.
London's Transport	An inefficient and lower density town centre is likely to require people to travel greater distances from their homes to wider retail services and entertainment uses.
London's Quality of Life	This approach could limit the efficient delivery of services within town centres potentially affecting its quality for users and limit the delivery of additional housing in town centres limiting the potential for improvements in quality of life for Londoners.

Opportunity and intensification areas

Table 4.5: Potential implications of not introducing the opportunity and intensification areas policy

Theme	Potential implications of not altering the opportunity and intensification areas policy
London's Places	Not updating the potential of these areas could limit the potential investment and result in these areas not delivering the full potential of housing, jobs and supporting infrastructure.
London's People	This approach could result in these areas not delivering their full potential of housing.
London's Economy	This approach could result in these areas not delivering their full potential of employment floorspace.
London's Response to Climate Change	This approach could limit the full potential of opportunity and intensification areas to meet growth demands and could result in unsustainable locations such as the green belt or areas of low PTAL being developed. The outcomes of the HRA and RFRA could influence the location of development or require mitigation measures.
London's Transport	Not updating the potential of these areas could limit the potential investment and result in these areas not delivering the full potential of development and therefore supporting infrastructure, including transport infrastructure.
London's Quality of Life	This approach could result in these areas not delivering their full potential of development limiting the benefits for existing and new communities.

Social infrastructure

Table 4.6: Potential implications of not introducing the social infrastructure policies

Theme	Potential implications of not altering the social infrastructure policies
London's Places	This approach is less likely to identify and acknowledge the demand for various types of social infrastructure so that

	additional infrastructure is not provided to meet demand.
London's People	This approach is less likely to result in the provision of infrastructure to meet the needs of the growing population.
London's Economy	The potential lack of local social infrastructure could result in London being a less attractive place to live and visit affecting its economy.
London's Response to Climate Change	This approach could result in the lower provision of open space per person placing additional strain on the biodiversity, urban greening and water store effect of existing open spaces.
London's Transport	The potential lack of local social infrastructure could result in Londoners having to travel further for services placing additional demand on transport infrastructure.
London's Quality of Life	The potential lack of local social infrastructure such as health services, sporting provision is likely to result in a lower quality of life for Londoners.

Physical infrastructure

Table 4.7: Potential implications of not introducing the Physical infrastructure policies

Theme	Potential implications of not altering the physical infrastructure policies
London's Places	This approach could result in the demand for physical infrastructure not being fully considered in the planning of an area and specifically in planning applications, detrimental to the functioning of an area and its capacity to support development.
London's People	This approach could delay the provision of essential physical infrastructure, resulting in the delayed provision of housing and/or result in additional costs to housing provision, affecting overall viability and the opportunity to provide other benefits.
London's Economy	This approach could delay the provision of essential infrastructure, resulting in the delayed provision of development and / or result in additional costs. In the long term this could affect London's competitiveness internationally and within the UK.
London's Response to Climate Change	This approach could result in unplanned individual solutions to infrastructure provision that could affect the viability of more strategic low carbon solutions.
London's Transport	This approach could result in the lack of funding for transport infrastructure placing additional burden on existing infrastructure, potentially resulting in the inefficient movement of people and goods. In the long term this could affect London's competitiveness internationally and within the UK.
London's Quality of Life	This approach could result in the delayed provision of development and / or result in additional costs, affecting overall viability and the opportunity to provide other benefits such as child play space, open space contributions, and improvements to the public realm.

Design

Table 4.8: Potential implications of not introducing the design policies

Theme	Potential implications of not altering the design policies
London's Places	This approach could result in the recent improved approaches to design and neighbourhood not being taken into account in local planning documents and in planning decisions. There would be less influence in the promotion of high quality local environment.
London's People	This could result in overcrowding and a lesser quality of housing provision, especially housing and spaces that provide flexibility over the lifetime of the occupiers.
London's Economy	This could result in a lesser quality of development and the public realm. If designing out crime is not fully considered, this could result in additional costs to businesses, individual and society through policing and insurance claims.
London's Response to Climate Change	No effect
London's Transport	This approach could result in less accessible, safe and attractive environments discouraging sustainable modes of transport such as walking and cycling.
London's Quality of Life	This approach could result in less accessible, safe and attractive environments discouraging walking and perhaps resulting in fear and enabling anti-social behaviour, affecting people's quality of life.

Noise

Table 4.9: Potential implications of not introducing the noise policy

Theme	Potential implications of not altering the noise policy
London's Places	This approach could result in areas of London exposed to unacceptable levels of noise.
London's People	This approach could result in housing schemes not fully considering and addressing the impacts of noise.
London's Economy	Not fully addressing the impacts of noise could result in a poorer environment and deter visitors to London detrimentally affecting the economy. This could place less burden on businesses and developers as their construction equipment and business operations such as running plant would have less stringent policy to comply with.
London's Response to Climate Change	No effect.
London's Transport	This would limit a policy approach that could affect some forms transport which a large generators of noise.
London's Quality of Life	This approach could result in areas of London exposed to unacceptable levels of noise, detrimentally affecting health and quality of life.

Waste

Table 4.10: Potential implications of not introducing the waste policy

Theme	Potential implications of not altering the waste policy
London's Places	This could result in the inappropriate amount of land being safeguarded for waste either preventing the use of sites for alternative uses such as housing, or resulting in the need to find additional waste sites in the future, perhaps in less sustainable or suitable locations.
London's People	This could result in the inappropriate amount of land being safeguarded for waste either preventing the use of sites for alternative uses such as housing.
London's Economy	This could result in the inappropriate amount of land being safeguarded for waste either preventing the use of sites for alternative uses such as economic generating activity, or resulting in the need to find additional waste sites in the future at an additional cost.
London's Response to Climate Change	This would not ensure the most carbon efficient use of the final waste product.
London's Transport	No effect.
London's Quality of Life	No effect.

5. Baseline information, key issues and indicators

5.1 Baseline information

- 5.1.1 An important part of the IIA scoping process is to identify the current baseline conditions relevant to the policies and any trends in those conditions.

Possible gaps in the information

- 5.1.2 A number of gaps have been identified in the existing baseline information collected for the scoping report. The reasons for these gaps may be that the information is currently not monitored or that it has not yet been reported on. Identifying these gaps at this stage provides an opportunity to develop methods for future monitoring. Also, as this is the preliminary stage in the SA process, it is possible that additional sources may be discovered through consultation. Should this be the case, the baseline will be updated accordingly.

Key Issues

- 5.1.3 Another element of the IIA scoping report is to identify the key issues arising from the baseline information, including any trends identified. Due to the short timeframes from the preparation of the baseline information for the 2011 London Plan to these further alterations, there has been insufficient time for any trends to have changed significantly, therefore the Key Sustainability Issues summarised in the scoping report for the London Plan 2011 are considered to still be relevant. A full list is provided in table 5.1. These Key Sustainability Issues have been updated to reflect any wider policy changes and carried forward to this scoping report. The Key Sustainability Issues for each of these are identified below each set of baseline data.

Table 5.1: Key Sustainability Issues for London

Key Sustainability Issues
<p>A. Development and Regeneration. The sustainable development and regeneration of London, including addressing areas of deprivation and generating a lasting and sustainable legacy from the Olympic Games, particularly for East London communities. The Opportunity and Intensification Areas offer significant potential for sustainable development to meet London's housing and employment needs.</p>
<p>B. Protecting Biodiversity. Biodiversity needs to be conserved and enhanced across London (from the central urban core through suburbia to the surrounding green belt) in ways that restore and promote its ecological function.</p>
<p>C. Managing Continued Population Growth. London's population is projected to continue to grow which means new homes jobs, and infrastructure need to be planned for in a sustainable way.</p>
<p>D. Improving and Protecting Health and Well-being. Poor health outcomes and a widening disparity of relative well-being across London, and the relative impacts on the capacity of Londoners' to engage economically and socially.</p>

Key Sustainability Issues

- E. Equalities.** The increasing disparity in quality of life across social groups and the impact of poverty on access to key social, environmental and economic infrastructure (for example: housing, transport, health care and education). There is also increasing polarisation of certain socio-economic groups within London.
- F. Delivering Appropriate Housing.** Affordability, level of provision, quality, sustainable design and location of housing in London, and its impacts on access, mobility, sense of place and resource use.
- G. The Changing Economy.** London has been impacted by the global recession and financial problems in Europe. London's unemployment rate has risen to over 8%. How London responds and emerges from the recession will have long term impacts on the region and the UK.
- H. London's World City Status.** The need to ensure London maintains its attractiveness to business and tourism to the benefit of all Londoners.
- I. Responding to Climate Change.** London's impact on the global climate, and the threat of current and expected climate change on London's population, biodiversity, built and natural environment, including the heat island effect and flood risk.
- J. Protecting Water Quality and Resources.** Population growth, lifestyle choices and climate change are all placing increasing demands on London's water quality and supplies. At the same time existing water resources need to be managed more effectively.
- K. Managing Waste.** Due to the volume of waste generated and put to landfill there is need for an integrated sustainable approach to managing waste in London, from reduction through to re-use, recycling and reprocessing.
- L. Increasing Transport Accessibility.** The need to reduce congestion and increase accessibility for all Londoners. There is a continued emphasis on travel by car rather than more sustainable modes of transport such as public transport, walking and cycling. There is also a need to reduce emissions from vehicles (to be addressed in the Mayor's Transport Strategy).
- M. Safeguarding (and enhancing) Heritage and the Historic Environment.** Due to competing land uses the quality of the cityscape and preservation of the historic environment may come under increasing pressure.
- N. Promoting Safety and Security.** Levels of crime and perceptions of safety from the perceptions of crime and its relationship to sense of place and community.
- O. Improving Access to Nature and Open Space.** There is need to improve the public realm and increase people's opportunity for contact with nature and London's rivers and open spaces.
- P. Improving Air Quality.** London's air is still polluted and is the worst of any city in the UK and amongst the worst in Europe. The primary cause of poor air quality in London is emissions from road traffic, although emissions from residential and workplace heating are also substantial.

5.1.4 The following table outlines the relationship the identified sustainability issues have with the issues that are required for consideration in Annex I of the SEA Directive.

Table 5.2: The relationship between SEA Issues and identified Sustainability Issues

Key SEA Issues	Key Sustainability Issues
Biodiversity	B, J and O
Population	C, D, E, F, and N
Human health	D, E, F, O and P
Fauna	B, I, J and O
Flora	B, I, J and O
Soil	B, I, K and O
Water	B, I and J
Air	I and P
Climatic factors	B, I, J, K and P
Material assets	A, F, H, I, L and N
Cultural heritage, including architectural, open spaces and archaeological heritage	M
Landscape	B, H, M and O

Indicators

- 5.1.5 Once the issues have been identified it is important that the IIA identifies indicators that can be used to monitor the adopted policies and address the issues. This scoping report sets out potential indicators to measure the effects of the policies below each set of Key Sustainability Issues.
- 5.1.6 To summarise the section below is set out in the following order:
- Baseline and trends
 - Possible gaps in the information
 - Key sustainability issues
 - Indicators
- 5.1.7 The London Plan was published in July 2011 and therefore it is too soon to fully monitor the impacts and trends of the Plan's policies, and to establish whether alterations are required to mitigate any unforeseen negative impacts of the published policies. However, the London Plan Annual Monitoring Reports show general trends for development and quality of life across London.

5.2 LONDON'S PLACES

Spatial vision

- 5.2.1 The London Plan introduced a new spatial vision for London with a greater focus on outer London, including through enhanced growth in new Strategic Outer London Development Centres. See section 2.3 for more detail. It also introduced specific policy on inner London for the first time, as well as maintaining support for the strategic and local functions of the Central Activities Zone.

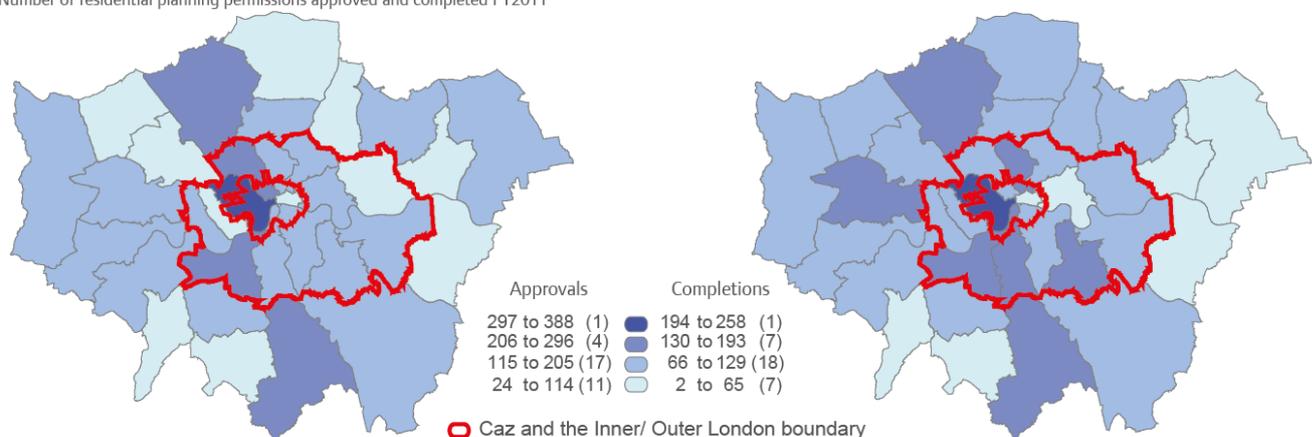
Table 5.3: Approvals and completions in London 2006/07 to 2011/12

Year	Approvals			Completions		
	Residential	Non-Res	Total	Residential	Non-Res	Total
2006/07	6247	1290	7537	4327	865	5192
2007/08	6862	1301	8163	4262	815	5077
2008/09	5560	1152	6712	4244	772	5016
2009/10	4519	1180	5699	3743	651	4394
2010/11	4781	1408	6189	2894	635	3529
2011/12	4929	1260	6189	3306	811	4117

- 5.2.2 As stated above, the spatial development model for London set out in the replacement London Plan was based on impact assessment work in conjunction with that of the Mayor's Outer London Commission. This amended the focus of development in Outer London including enhanced growth in new strategic outer London Development Centres. The FALP will consider the potential to implement the recommendations from the Commission's second report regarding car parking and densities in outer London and its emerging third report. This focuses on town centre renewal and redevelopment within the context of the twin challenges of population growth and increased internet shopping with reduced growth in demand for comparison goods floorspace.

Map 5.1 Number of Residential Planning Permissions Approved and Completed during 2011/12

Number of residential planning permissions approved and completed FY2011

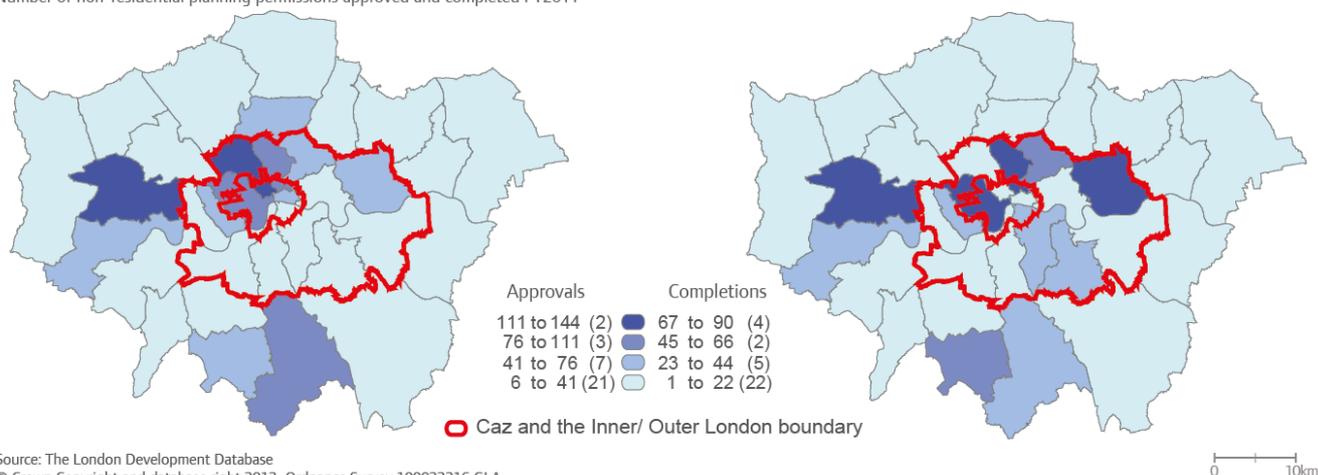


Source: The London Development Database
© Crown Copyright and database right 2013. Ordnance Survey 100032216 GLA

0 10km

Map 5.2 Number of Non-Residential Planning Permissions Approved and Completed during 2011/12

Number of non-residential planning permissions approved and completed FY2011



Regeneration and land use

5.2.3 The table above shows the number of planning approvals and development completions from April 2006/7 to March 2011/12. The number of approvals and completions can be useful to provide a snapshot of the density of activity in the land use and the development industry. The figures reflect the contraction in the economy.

Mixed and strong communities

5.2.4 Ten per cent of wards which had the most social housing in 2001 accommodated 20% of all new housing and 27% of new social housing completed between 2004/05 to 2008/09¹². London's legacy of mono tenure estates in some cases is thought to have reinforced concentrations of worklessness and deprivation. The REMA to the London Plan will further ensure mixed and strong communities by firstly seeking affordable housing is provided on-site, that is, in conjunction with market housing.

Brownfield development

5.2.5 London has consistently exceeded, by a significant margin, the national 60% benchmark for accommodating growth on brownfield sites. In terms of both site area and number of dwellings approved, 99% of new housing approvals in 2010/11 was on previously developed land and the figures for housing completions were slightly higher.

Table 5.4: Percentage of residential development on previously developed land within London

Year	% total units approved	% total units completed
2006/07	98.5	97.2
2007/08	97.1	96.5

¹² GLA, Housing in London 2010, October 2010

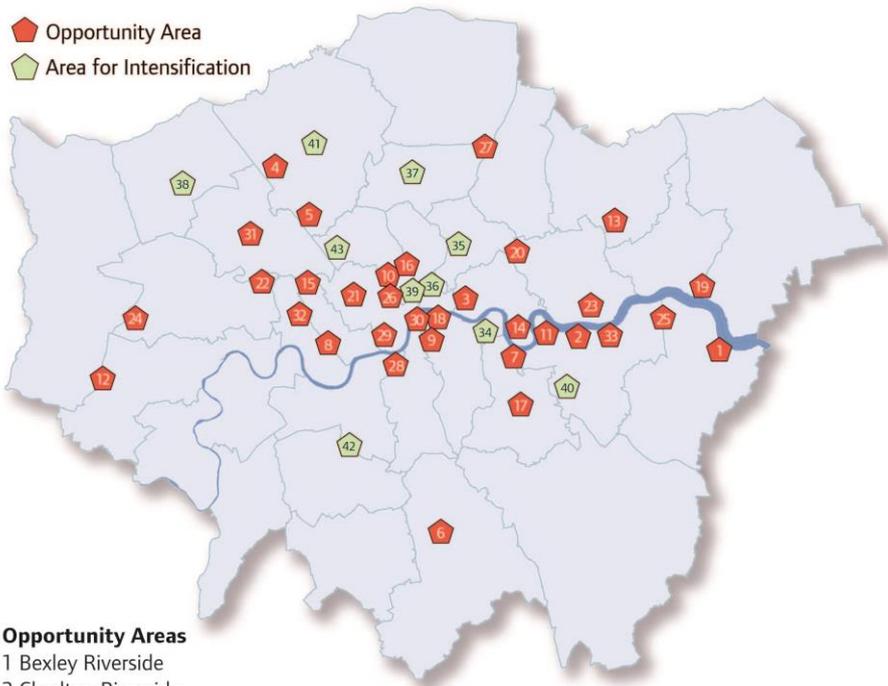
Year	% total units approved	% total units completed
2008/09	97.8	98.5
2009/10	96.7	98.7
2010/11	99.0	97.6

Source: London Development Database

Opportunity areas

- 5.2.6 The London Plan designates 33 Opportunity Areas and 10 Areas for Intensification. These areas generally have a large amount of brownfield land available to accommodate a significant amount of new housing, commercial and other land uses linked to existing or potential improvements to public transport accessibility. Opportunity Areas can generally accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two. The London Plan 2011 states that together the Opportunity Areas have a capacity for 490,300 additional jobs and 233,600 additional homes. These figures will vary as more detailed planning is done for each Opportunity Area. Emerging figures suggest a general increase in capacity in the Opportunity Areas. The importance of the Opportunity Areas and their development potential is further highlighted in the Mayor's 20:20 Vision. Given the need for housing in London, the potential to designate further Opportunity or Intensification Areas will be considered.
- 5.2.7 Areas of Intensification are typically already built up with good existing or potential public transport accessibility which can support redevelopment at higher densities. They have significant capacity to new jobs and homes, but lower than that of opportunity areas. The London Plan states that together the Areas of Intensification can accommodate 13,000 new jobs and a further 14,350 homes. Again, these figures will vary as more detailed planning is done for each Area.
- 5.2.8 Various guidance documents have been prepared for some of the opportunity areas either by the Mayor as an Opportunity Area Planning Framework or by the relevant borough, generally in conjunction with each other.

Map 5.3: Opportunity and Intensification areas



Opportunity Areas

- | | |
|--------------------------------------|---|
| 1 Bexley Riverside | 19 London Riverside |
| 2 Charlton Riverside | 20 Lower Lee Valley (including Stratford) |
| 3 City Fringe | 21 Paddington |
| 4 Colindale/Burnt Oak | 22 Park Royal/Willesden Junction |
| 5 Cricklewood/Brent Cross | 23 Royal Docks and Beckton Waterfront |
| 6 Croydon | 24 Southall |
| 7 Deptford Creek/Greenwich Riverside | 25 Thamesmead & Abbey Wood |
| 8 Earls Court & West Kensington | 26 Tottenham Court Road |
| 9 Elephant & Castle | 27 Upper Lee Valley
(including Tottenham Hale) |
| 10 Euston | 28 Vauxhall, Nine Elms & Battersea |
| 11 Greenwich Peninsula | 29 Victoria |
| 12 Heathrow | 30 Waterloo |
| 13 Ilford | 31 Wembley |
| 14 Isle of Dogs | 32 White City |
| 15 Kensal Canalside | 33 Woolwich |
| 16 King's Cross | |
| 17 Lewisham, Catford & New Cross | |
| 18 London Bridge & Bankside | |

Areas for Intensification

- 34 Canada Water
- 35 Dalston
- 36 Farringdon/Smithfield
- 37 Haringey Heartlands/Wood Green
- 38 Harrow & Wealdstone
- 39 Holborn
- 40 Kidbrooke
- 41 Mill Hill East
- 42 South Wimbledon/Colliers Wood
- 43 West Hampstead Interchange

Town centres and other retail centres

5.2.9 The 2013 Consumer Expenditure and Comparison Goods Floorspace Need in London indicates that London household expenditure on **comparison goods** retail is expected to grow at 3% per annum over the period 2011-2036 (down from the 4.3% per annum growth projected in the London Plan 2011).

5.2.10 London household expenditure on **convenience goods** retail is expected to grow at 2.2% per annum over the period 2011-2036 (down from the 1.5% per annum growth projected in the London Plan 2011).

5.2.11 A rise in **comparison goods** retail spend is expected in London from £18.6 billion in 2011 to £39.2 billion in 2036 (taking into account expenditure by London households, commuters from outside London and overseas/domestic tourists).

5.2.12 The table below shows the expected store closures nationally between 2012 and 2018. This shows the lowest decrease in London with 9%.

Table 5.5: Regional store closures and vacancy rates

Region	Total stores 2012	Total stores 2018	Store closures	% decrease
Wales	14,500	10,349	4,151	29%
North west	24,100	17,255	6,845	28%
East Midlands	20,950	15,294	5,656	27%
Yorkshire & Humberside	22,638	16,780	5,858	26%
North East	37,000	27,723	9,277	25%
West Midlands	24,400	18,384	6,016	25%
Scotland	24,885	19,050	5,835	23%
South West	23,660	18,150	5,510	23%
Eastern	23,600	18,484	5,116	22%
South East	39,197	34,055	5,142	13%
London	27,000	24,476	2,524	9%
Total	281,930	220,000	61,930	22%

Source: Retail Futures 2018, May 2013

Impact of the internet

5.2.13 ONS data shows that the share of retail sales via the internet rose to 10.7% at the end of 2012. Experian's central forecast for comparison goods retail sales via the internet is 21% by 2021 and a 'high' scenario of 28%. Some commentators (eg The Economist, June 2013) suggest that the share of retail spend via the internet could rise to 40%. This will have an impact on retail space, but there is considerable uncertainty. Growth in retail floorspace will continue to be monitored closely.

Table 5.6: Breakdown of growth of online retail

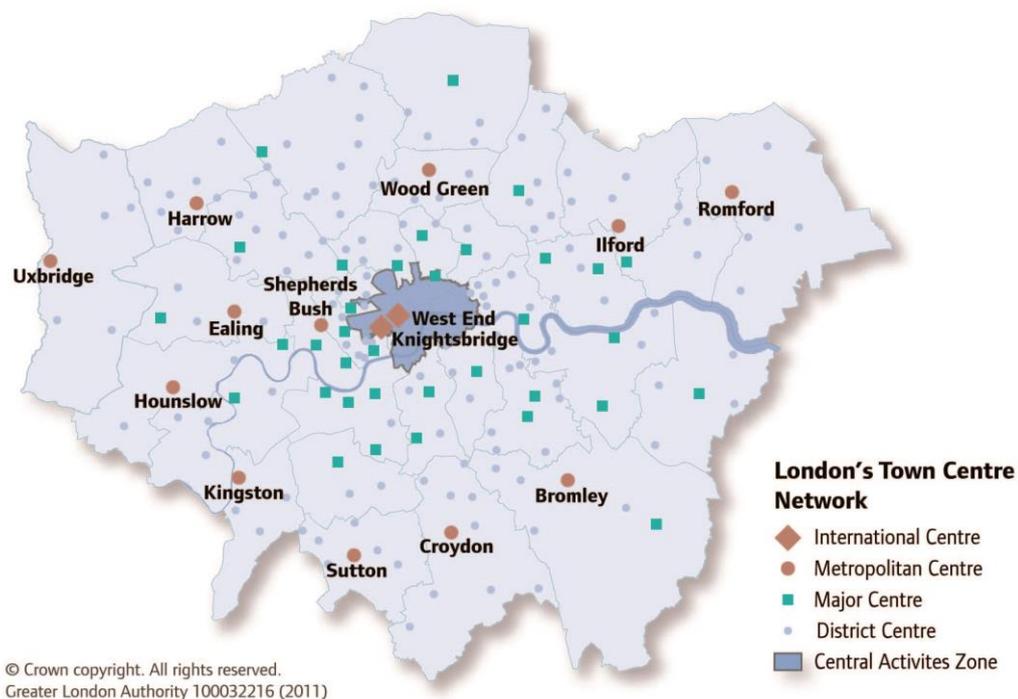
	2012	2018
Food online share	3.7%	9.5%
Non-food online share	19.2%	32.1%
All retail online share	12.7%	21.5%

Source: Retail Futures 2018, May 2013

Comparison goods retail floorspace demand

- 5.2.14 London is projected to have a **net comparison goods retail floorspace requirement** of at least **370,000 sqm** between 2011 and 2036 - taking into account growth in spending in London by residents, commuters and tourists and making allowances for growth in special forms of trading, retail floorspace efficiency and retail commitments in the planning pipeline (such as Brent Cross and Westfield London extensions).
- 5.2.15 In addition, the Mayor is leading on Town Centres Health Checks to review the designation of town centres and other retail centres based on the loss or increase of retail floorspace.

Map 5.4: London's town centres



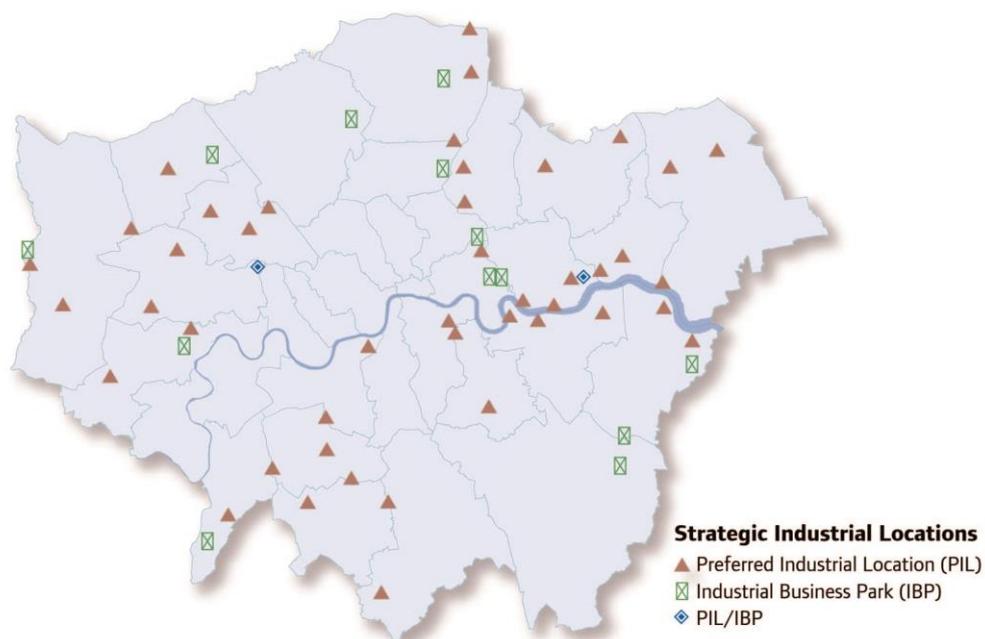
- 5.2.16 The Government has introduced changes to the General Permitted Development Order to enable limited extensions to certain land uses, including retail units to provide additional retail floorspace. Another amendment enables the change of use of a limited amount of floorspace between different use classes without the need for planning permissions for up to two years. In some areas of London this has led to concern regarding the further concentration of potentially anti-social land uses such as betting shops. This has led some boroughs to investigate using Article 4 Directions to limit some potential changes of uses without permission. The concentration of take-aways, especially near to schools is another land use of concern in certain boroughs. The Government's aim of this policy is to revitalise town centres.
- 5.2.17 In addition, the Government is consulting on further changes to the General Permitted Development Order to enable the change of use from retail to residential without the need for planning permission. The aim of this change is to increase the supply of housing and revitalise town centres. The Mayor's proposed alterations will review the role of town centres and will encourage the proactive management of floorspace in

town centres and encourage the provision of higher density housing to support the overall role of town centres.

Strategic industrial land

- 5.2.18 The 'London industrial land demand and release benchmarks' identifies that employment in the traditional industrial sectors in London fell by 35% between 1998 - 2008, which equates to a loss of nearly 100,000 jobs. This rate was much higher than the national rate of loss. Forecasts for these sectors show a continued loss, though at a reduced rate of decline. It is estimated that London will lose a further 85,000 jobs in the industrial production sectors over the period 2011-31¹³. Applying employment density and plot ratios, this is equivalent to the loss of 3.44m sqm of industrial floorspace or 821ha of industrial land.
- 5.2.19 However, the demand for land for more recent industrial land uses such as warehousing and logistics activity has been growing in London in past years and is projected to continue to grow. Growth is driven by the strength of consumer and business demand in London. The main consideration is the extent to which this demand is supplied from within London's boundaries or from outside.
- 5.2.20 The central scenario projections show demand for a net addition of 329ha for warehousing and logistics. Much of this can come from reconfiguring the redundant industrial production land for logistics need.
- 5.2.21 However, a significant proportion of London's industrial land is occupied by service sector activity. As London's service sector continues to grow it is likely that demand for industrial type land will grow.

Map 5.5: London's Strategic Industrial Locations



Source GLA: © Crown copyright. All rights reserved. Greater London Authority 100032216 (2011)

¹³ London industrial land demand and release benchmarks. Roger Tym & Partners with Jones, Lang LaSalle (2011)

Liveability

5.2.22 Almost eight out of ten Londoners (79%) are 'satisfied' with their neighbourhood as a place to live and just over one in five (22%) are 'very satisfied'. Over one in ten Londoners are 'dissatisfied' with their neighbourhood (13%)¹⁴. Levels of neighbourhood satisfaction have remained relatively consistent since 2001, with the exception of a low of 78% in 2003 and a peak of 86% in 2010¹⁵. For the last three years transport received the most nominations as being the best things about living in London. The variety of shops had the second most mentions, and had previously had the most nominations.

The Annual Survey of Londoners (2011) also noted differences across the various sub-groups of the London population:

- Satisfaction across age groups varies, people aged over 65 years are the least satisfied (75%), followed by those aged 25 to 34 years (77%).
- More affluent households tend to be more satisfied. 86% of affluent residents are satisfied compared with 74% of less affluent residents.
- People living in social housing are more likely to be the least satisfied (76%) compared with home-owners (82%).
- Those working are likely to be more satisfied than other groups by working status. People working part-time appear to be the most satisfied (85%).
- People with a disability or long-term illness are less likely to be satisfied (71% compared with 80% of those without a disability or long-term illness).
- Londoners from ethnic minorities¹⁶ have become less satisfied over the last year (73% are satisfied compared with 82% of White Londoners). For Asian and other ethnic communities this is driven by an increase of those who say they are neither satisfied nor dissatisfied, but for Black communities it is driven by an increase in dissatisfaction.
- The longer people have lived in London, the more disillusioned they appear to be (those living in the capital for eleven years or more are the least satisfied with 78% stating they are satisfied compared with 83% of people who have been living in London for less than five years).
- Satisfaction by constituency varies from high satisfaction in West Central (92%), to lower satisfaction at 61% in City & East and Greenwich & Lewisham.

5.2.23 Liveability is about creating places where London's communities will want to live and work for the long term. It ties in with the concept of Lifetime Neighbourhoods which was introduced in the London Plan, and more recently is strongly supported in the NPPF. Lifetime Neighbourhoods are designed to adapt and change to meet people's needs throughout their lives, enabling people to stay within communities for the long term. This is reflected in well planned and designed housing, places and spaces along with opportunities, in the widest sense, for employment and services and well developed places where consideration has been given to movement, form, views, open space and landscape. It also seeks to develop social character which is welcoming and fosters good relationships between people and encourages people to participate in society. The Mayor is preparing a Lifetime Neighbourhoods and Neighbourhood Planning SPG. This will include a strong element on social infrastructure.

¹⁴ GLA, Annual Survey of Londoners, 2011

¹⁵ GLA, Annual Survey of Londoners, 2011

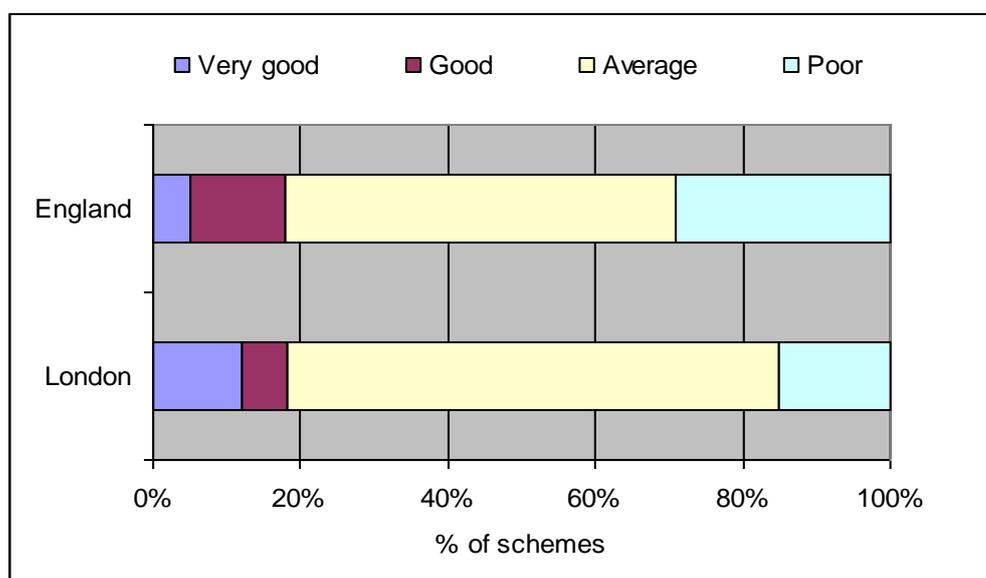
¹⁶ This includes people from Black, Asian and other ethnic minorities.

5.2.24 The challenge for the future is to produce more homes, better suited to current and future needs, at higher densities, in sustainable mixed communities, with appropriate social and physical infrastructure and minimal environmental impact. A key issue is ensuring this housing meets the variety of needs of Londoners, including affordability and accessibility.

Design and quality

5.2.25 In recent years, there has been concern that increasing the quantity of housing may be at the expense of quality. The design quality of new homes is better in London than elsewhere, but still not good enough overall.

Figure 5.1: Design ratings of new homes built between 2004 and 2007¹⁷



5.2.26 The Mayor initially sought to address this issue in the London Plan, which for the first time included minimum space standards for new homes, and in his London Housing Design Guide¹⁸. The new design standards show how high quality homes can be delivered, with generous space standards, even at relatively high densities. It places a greater emphasis on the home's connection to the local environment and on the flexibility to adapt to people's lifestyles and be fit for different life stages. The Mayor's design guide is being delivered for affordable housing and new standards are being applied to private sector housing through the London Plan and Housing Supplementary Planning Guidance.

5.2.27 New development in London is providing opportunities for the improvement of existing open spaces and the public realm as well as providing new public spaces. For example, several new public and green spaces will be delivered as part of the development of the King's Cross Central area. In addition, the Vauxhall Nine Elms Opportunity Area Framework identifies a new open space.

5.2.28 Given the higher density of housing delivered in London and the number of flats there is concern over the Governments Housing Standards review that could prevent the

¹⁷ Commission for Architecture and the Built Environment

¹⁸ GLA, London Housing Design Guide, August 2010

Mayor applying these standards to encourage sufficient space to be provided to meet the needs of for a range of occupiers.

Green infrastructure

- 5.2.29 Greenspace Information for Greater London (GiGL)¹⁹ has calculated the total area of open space in Greater London as 62,379.92 ha. This equates to 39.1% of the area of London. GiGL define open space as *‘undeveloped land which has an amenity value, or has potential for an amenity value. The value could be visual, derive from a site’s historical or cultural interest or from the enjoyment of facilities which it provides. It includes both public and private spaces, but excludes private gardens’*. This is similar to the definition of open space in the London Plan and extends beyond open space that is designated by the boroughs.
- 5.2.30 Of this open space nearly half (30,585.47ha) is identified as Sites of Importance for Nature Conservation (SINC).

Table 5.7: Sites of Importance for Nature Conservation (SINC) in London.

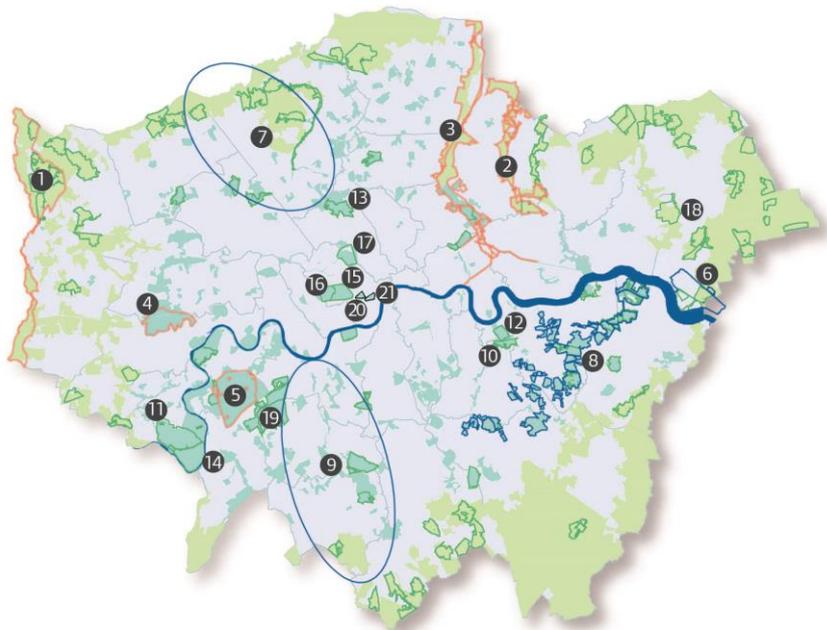
Grade of SINC	Total area (ha)	Percentage of London area
Metropolitan	16,197.83	10.2
Borough	12,614.36	7.9
Local	1,773.28	1.1

Source: GiGL

- 5.2.31 The Mayor, including through his London Plan takes an integrated approach to green and open spaces. The term green infrastructure refers to the network of all green and open spaces together with the Blue Ribbon Network that provides multiple benefits for Londoners. It functions best when designed and managed as an interdependent ‘green grid’ where the network is actively managed and promoted to support the wide range of functions it performs.

¹⁹ The capital’s environmental records centre

Map 5.6: London's strategic open space network

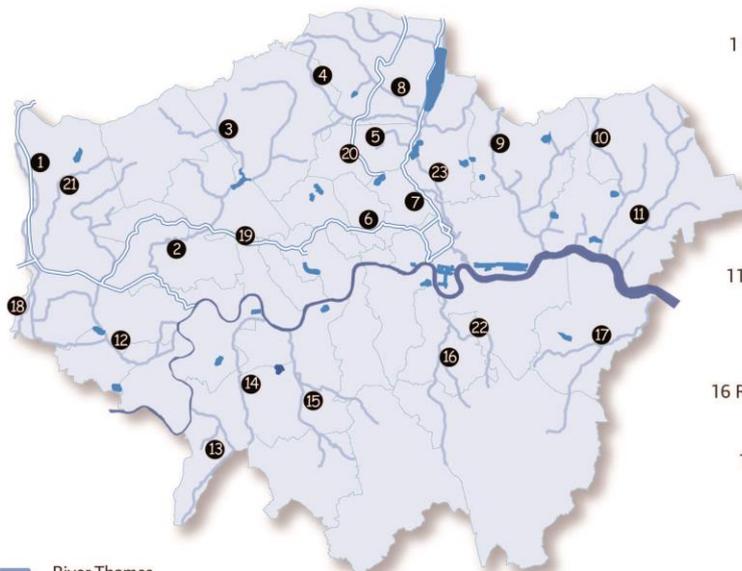


London's Royal, Regional and Metropolitan Parks

- | | | | |
|--|--|---|---|
| <ul style="list-style-type: none"> Metropolitan Open Land Green Belt Regional Parks | <ul style="list-style-type: none"> Regional Park Opportunities 6. London Riverside Conservation Park 7. Northern Area 8. South East Green Chain 9. Wandle Valley (boundaries under consideration) | <ul style="list-style-type: none"> Metropolitan Parks 10. Blackheath 11. Bushy Park* 12. Greenwich Park* 13. Hampstead Heath 14. Hampton Court Home Park 15. Hyde Park* 16. Kensington Gardens* 17. Regents Park* 18. Thames Chase Community Forest 19. Wimbledon Common | <ul style="list-style-type: none"> Other Royal Parks 20. Green Park* 21. St. James's Park* <p>* Indicates a Royal Park</p> |
|--|--|---|---|

Source: The GLA
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Map 5.7: Blue Ribbon Network



- 1 Grand Union Canal
- 2 River Brent
- 3 Silk Stream
- 4 Pymmes Brook
- 5 Moselle Brook
- 6 Regents Canal
- 7 Lee Navigation
- 8 Salmons Brook
- 9 River Roding
- 10 River Rom
- 11 Ingrebourne River
- 12 River Crane
- 13 Hogsmill River
- 14 Beverley Brook
- 15 River Wandle
- 16 Ravensbourne River
- 17 River Cray
- 18 River Colne
- 19 Paddington Arm
- 20 New River
- 21 River Pinn
- 22 River Quaggy
- 23 River Lea

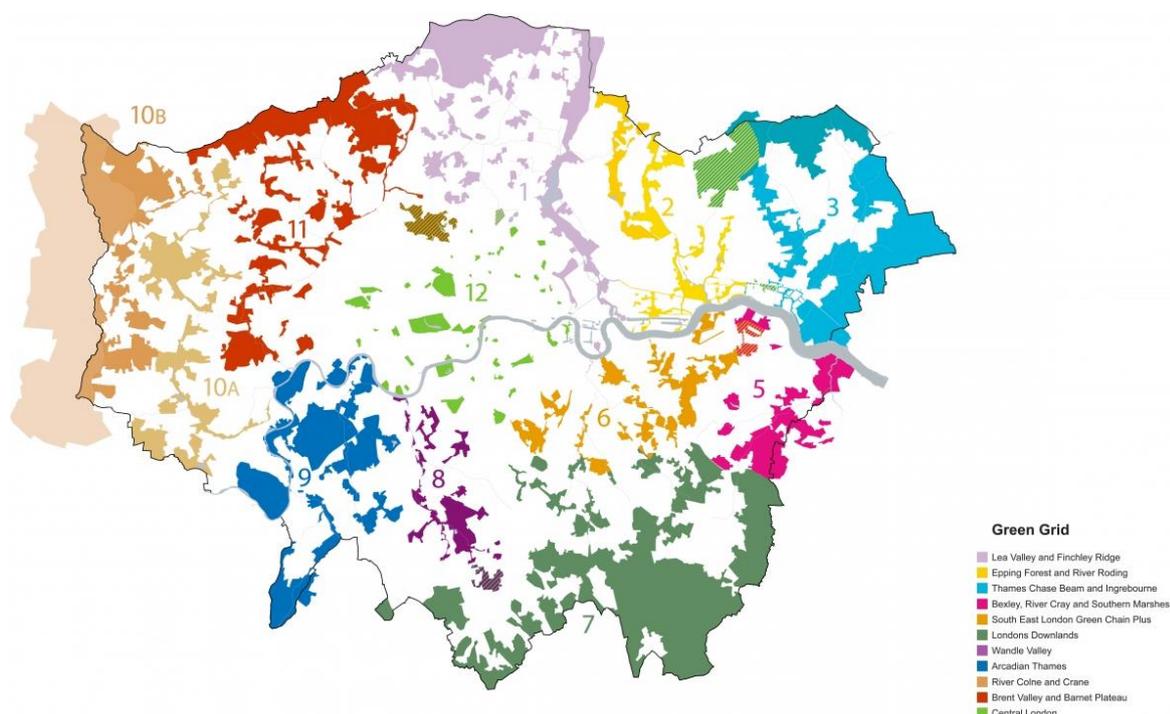
- River Thames
- Large Tributary Rivers
- Canals and River Navigation
- Large Lakes and Docks

Note: Not all tributaries are shown

Source Environment and Scientific Services, British Waterways
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5.2.32 The Mayor has supported the identification of 11 Green Grid Areas and the establishment of area-based partnerships (area groups) throughout London to promote cross boundary working. The area groups have developed a programme of projects and opportunities, set out in Area Frameworks, to enhance and extend the network. The Area Frameworks expand on the implementation points and strategic opportunities identified in the All London Green Grid Supplementary Planning Guidance. The regional park in the Wandle Valley is now fully established with a Trust overseeing the projects and any future development within the Park. Green infrastructure has strong links with social infrastructure. See the liveability section above and health and well-being and mental health in section 5.7 below.

Map 5.8: All London Green Grid



Open space and recreation Children and young people

5.2.33 The paragraphs above set out the amount and role of open space in London. Safe and stimulating play facilities are essential for children and young people to develop physically and socially. It can also help achieve other goals such as access to nature. Play London state that nearly half of children in London surveyed say they do not play out as much as they like. A third say they would play out more if it were safer. This is around 10% higher than the UK average²⁰. In 2012 the Mayor published his revised Play and Informal Recreation Supplementary Planning Guidance. Play spaces should also be inclusive and accessible.

5.2.34 Boroughs are also implementing initiatives to support children’s play. Hackney has 18 play streets, where local streets can be closed for a set period to enable children to play

²⁰ <http://www.londonplay.org.uk/index.php>

in them. Further play streets are emerging in Haringey, Islington, Croydon, Waltham Forest and Lewisham.

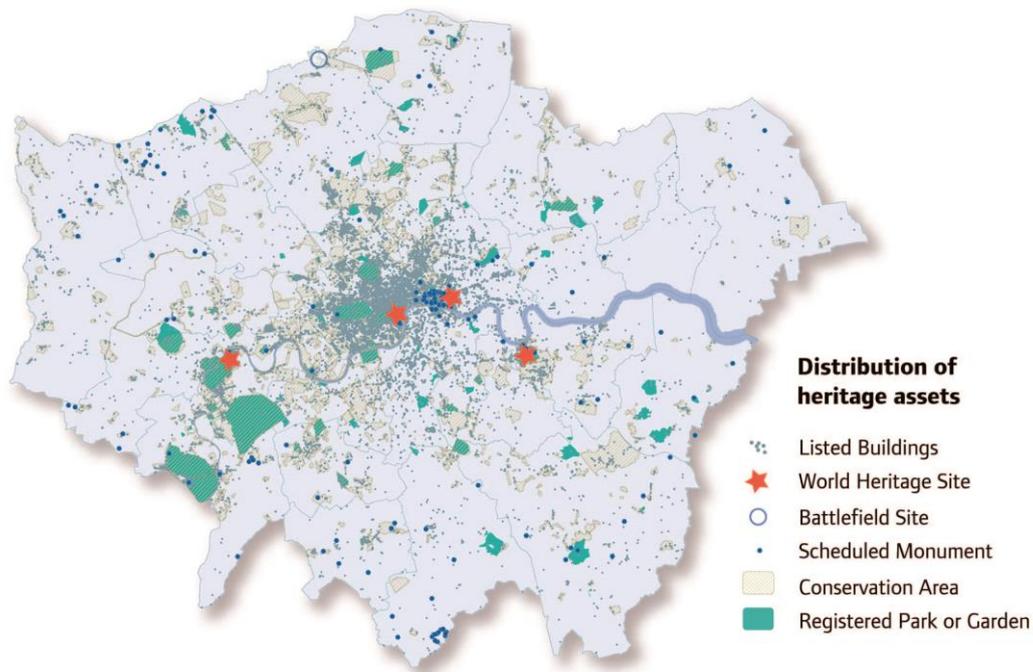
Historic environment

5.2.35 Heritage Counts London²¹ notes that:

- Four of England's 17 world heritage sites are in London – the Tower of London, Westminster Abbey, the Royal Botanical Gardens Kew and maritime Greenwich;
- There are 155 scheduled monuments in the capital;
- London has over 18,000 listed buildings, 998 conservation areas, 149 registered parks and gardens and one registered battlefield;
- There were at least 12.6 million visits to London's heritage sites in 2009/10; and
- English Heritage's staffed sites in London saw 375,000 visits in 2009/10 - a 17% increase on the previous year.

5.2.36 In 2011 an additional 58 additional heritage items were designated in London, with a further nine items given an upgraded listing²². Two additional historic parks and gardens were also designated.

Map 5.9: Spatial distribution of designated heritage assets



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Greater London Authority 100032216 (2011)

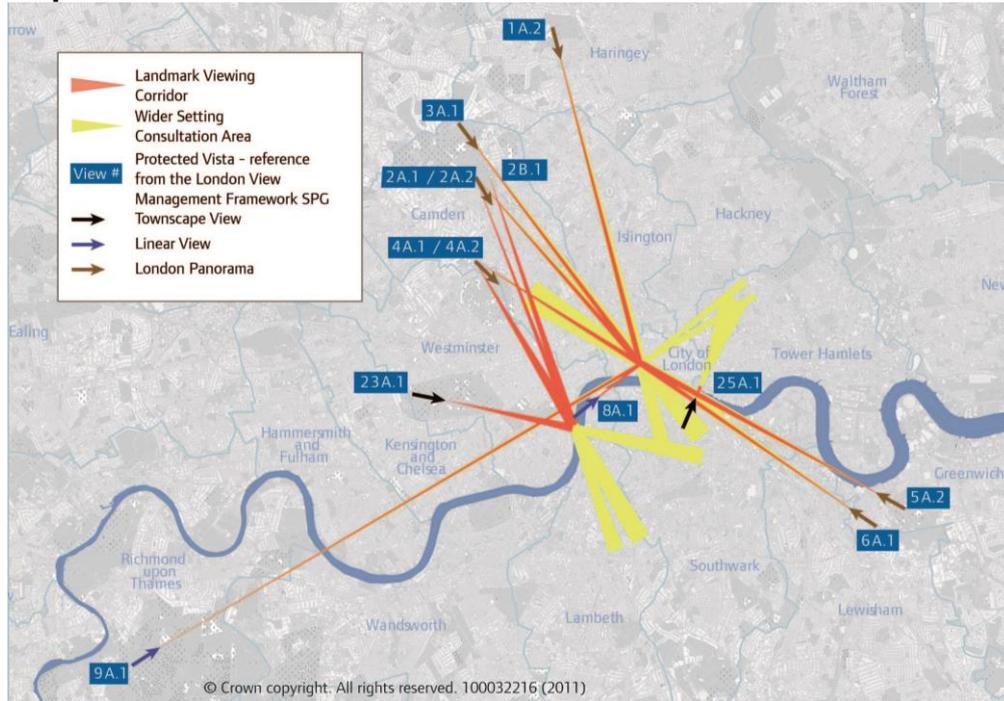
Source: Conservation areas, Landmark 2008.
All other data, English Heritage

5.2.37 London also has protected vistas designated through the London Plan. Protected vistas are designed to preserve the viewer's ability to recognise and appreciate a strategically important landmark from a designated viewing place.

²¹ Heritage Counts London, English Heritage 2010

²² The London List 2011. English Heritage 2011

Map 5.10: Protected views



5.2.37a Some London Boroughs also have local designations such as locally important and protected views and locally listed historic assets. The Boroughs designate Conservation Areas and generally have Conservation Area Statements and/or Management Plans to monitor and improve the historic value of these areas. Some boroughs implement Article 4 Directions to protect the appearance of the streetscape in these areas. The boroughs can also take a proactive approach to improving the value of historic assets by addressing assets that are on their Heritage at Risk registers.

5.2.38 English Heritage annually reports against a range of its indicators. In 2012 English Heritage reported²³ since 2005/6 the proportion of people across all ages and economic groups who report having visited a heritage site in the last year has increased significantly. Five socio-demographic groups which experienced an increase between 2005/6 and 2011/12 are:

- Black and ethnic minority groups (up 10.7 percentage points to 61.4%)
- Social rented sectors (up 9.2 percentage points to 55.6%)
- Lower socio-economic groups (up 6.1 percentage points to 63.2%)
- Those aged 75+ (an increase of 6.1 percentage points to 58.2%)
- People with limiting illness or disability (an increase of 3.1 percentage points to 67%)

5.2.39 There are no reported figures specifically for Londoners or London heritage sites. Although, between 2005/06 and 2011/12, heritage attendance increased significantly in London (up 4.9 percentage points to 68.6%²⁴).

5.2.40 In addition, there were approximately 720,000 empty dwellings in England in 2011, a drop of 2% on 2010. 279,000 of these are classed as 'long-term empty' meaning they

²³ Heritage Counts 2012. English Heritage 2012

²⁴ *ibid*

have been vacant for at least six months. This is one of the main reasons historic buildings become 'at risk'. The number of empty dwellings rose every year up to 2008, after which it has declined at a steady rate. This may be a combination of the slowing down of the property market since 2008 and concerted efforts by Government since 2010 to tackle the number of empty homes in England. There are no reported figures specifically for London.

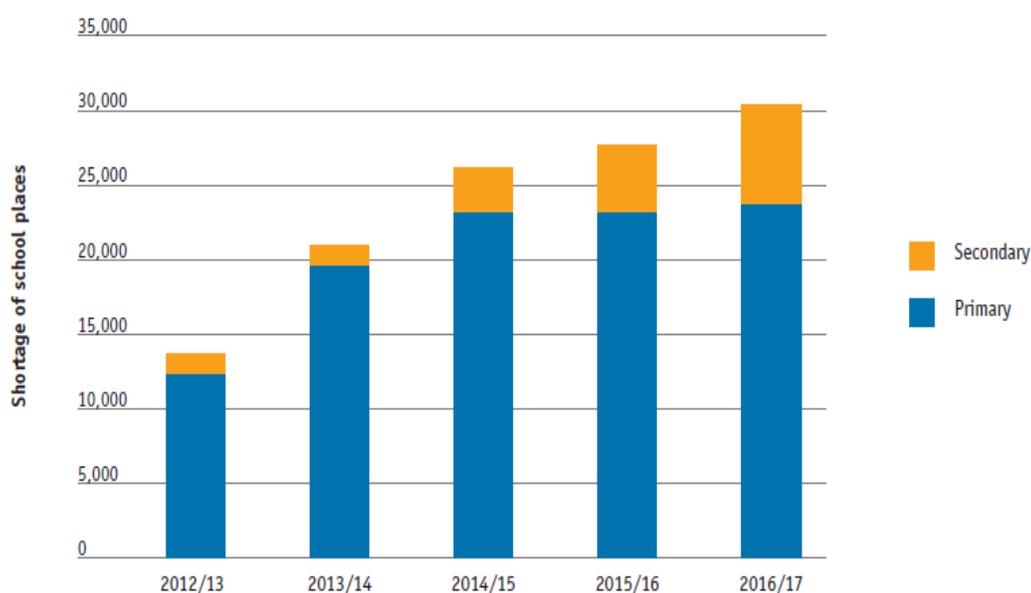
5.2.41 In 2012 the Mayor published his London World Heritage Sites - Guidance on Settings Supplementary Planning Guidance.

5.2.42 The Government is introducing changes to enable a more proactive approach to the management and therefore carrying out works to listed buildings as well as to generally simplify the consent regime. There is an ambition to see heritage items as assets that generate economic value.

Demand for school places

5.2.43 In 2011/12, London had just under 1.1 million children in its education system. This figure is set to grow year on year to approximately 1.25 million by 2016/17. Pupil numbers are growing at a faster rate in London than anywhere else in the country. Based upon current projections, London boroughs are facing a shortage of 118,000 primary and secondary school places up until 2016/17. While other areas also face shortages, the pressure on school places is at its most acute in London – 42% of all shortages in school places nationally will be found in London. Despite this, London will only receive 36% of the recent basic need capital allocation for 2013 to 2015.

Figure 5.2: Shortage of school places



Source: London Councils

Possible gaps in the information and implications

5.2.44 The London Plan has now been published for two years, however there has only be one year of reporting data through the Annual Monitoring Report and many developments being built today will have been permitted prior to its publication.

5.2.45 There have been significant recent changes to the planning system that will limits parts of London from protecting their office employment space, but it will result in more housing. However, it is uncertain what the quality of this housing will be. The changes will also temporarily limit the control boroughs have over the types of A Class uses in town centres where the use is less than 150sqm. These changes can have spatial implications for the distribution of land uses across London and could have sustainability implications depending on their location. They could limit the potential impact of the proposed alterations as planning permission will not be required for certain changes of use. Piecemeal changes of use would limit the potential for strategic development and regeneration.

5.2.45 Potential sustainability issues for consideration in the IIA

- Development and regeneration
- Managing continued population growth
- Housing
- Employment
- Liveability and place
- Equalities
- Heritage
- Open space

5.2.46 Potential indicators

- proportion of developments on previously developed land
- density of housing development
- loss of open space
- supply of new housing
- supply of affordable housing
- level of economic activity
- sufficient capacity of office floorspace
- sufficient supply of employment land
- employment in outer London
- quality of housing

5.3 LONDON'S PEOPLE

Population

5.3.1 Since the publication of the London Plan 2011 and REMA and the informing IIAs, the 2011 Census results have been published. These showed London's population significantly larger than had been projected.

5.3.2 The London Plan 2011 and its IIA set out how London's population has changed in the past and is projected to grow and change over the lifetime of the Plan, up to 2031. The

FALP will be based on the Census population figures and roll the projections forward to 2036.

- 5.3.3 The population of London on Census day (27 March 2011) was 8.2 million, an increase of 12% from 2001 when it was 7.3 million²⁵. London was the greatest-growing region across England, ahead of three regions that grew by 8% – the South East, East of England and East Midlands. By comparison the population across the whole of England and Wales increased by 7% to 56.1 million. This is the largest growth in population in any 10 year period since census taking began in 1801²⁶.
- 5.3.4 Most local authorities in London saw their populations increase between 2001 and 2011, although there was a decrease of 2.2% in Kensington and Chelsea. Nine of the 20 local authorities with the fastest population growth in England and Wales were in London, and Tower Hamlets and Newham were the only authorities in England and Wales to show growth of more than 20%, with the fastest growth of all being 26.4% in Tower Hamlets²⁷.

Density

- 5.3.5 The 19 most densely populated local authorities in England and Wales were in London, with Islington the most densely populated of all with 13,873 people per square kilometre. Bromley was the least densely populated with 2,060 people per square kilometre, which is still more than five times the average population density of England and Wales as a whole²⁸.

Age

- 5.3.6 The local authority in London with the largest proportion of people aged 65 and over was Havering with 18%; by contrast, only 6% of the population in Tower Hamlets were in this age group which is the lowest figure in London as well as in England and Wales. The largest proportion of people aged 19 and under in London (and England and Wales) is in Barking and Dagenham with 31%; by contrast, 11% of the population of the City of London is in this age group, the smallest proportion in England and Wales²⁹.
- 5.3.7 In London there was a 24% increase in under-fives compared with 2001, compared to a 13% increase for England and Wales. Barking and Dagenham has the highest proportion in this age group with 10%, and the City of London the lowest at 3%³⁰. The figure below shows the London's age structure by non-UK place of birth. This gives an indication of how the ethnic profile of London may change over the years.
- 5.3.8 The White British population had an older age structure than the London average. The group were under-represented in all age groups up to 45 years of age and then, in the older age groups, were over-represented³¹. The other White ethnicities have a very distinct migration-driven age-structure. This group includes many European-born migrants as well as a shrinking (since 2001) White Irish population. The distinctive

²⁵ Office of National Statistics, 2012

²⁶ *ibid*

²⁷ *ibid*

²⁸ *ibid*

²⁹ *ibid*

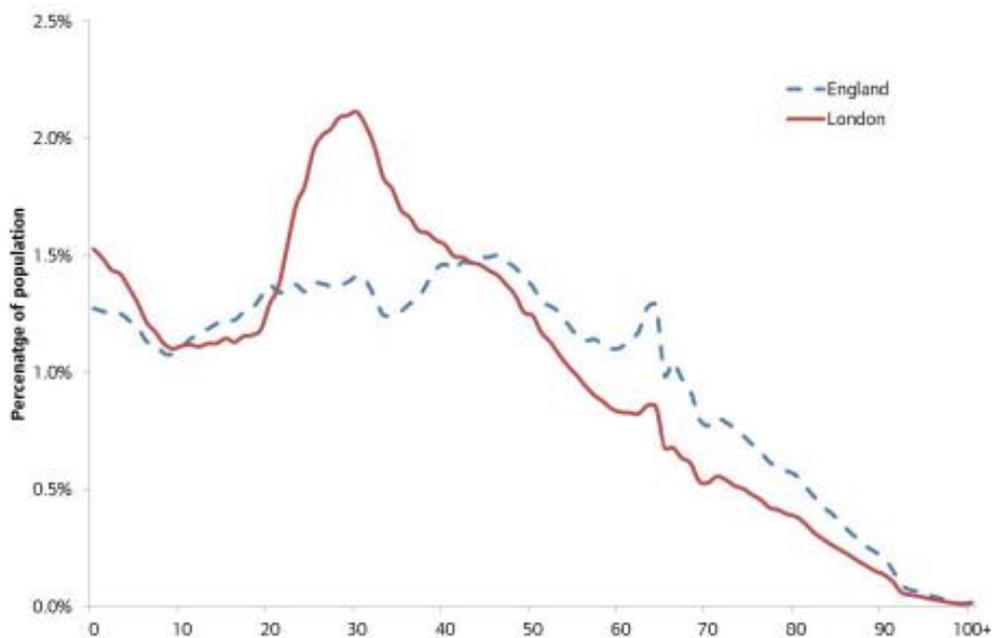
³⁰ *ibid*

³¹ Census information scheme. GLA 2013

feature of this group is the significant concentration of the population in the age bands between 20 and 44, with a particular peak between the ages of 25 and 34 and a steep decline from 40 onwards³².

5.3.9 The mixed ethnicity population was a very young population. Half (50.6%) of the Mixed ethnicity population were aged 0 to 19 and just 8.4% were aged 50 or over³³. The Asian population had an age structure which forms almost a mirror image of the White British population: a slight over-representation in the younger age groups is followed by an under-representation in older groups³⁴. In the black population of London the proportion of children was especially high and the numbers seen in the older age groups particularly low³⁵. The Arab population displays characteristics typical of the London population, but is younger³⁶.

Figure 5.3: Age structures of London and England, 2011



Source: Diversity in London GLA

³² ibid

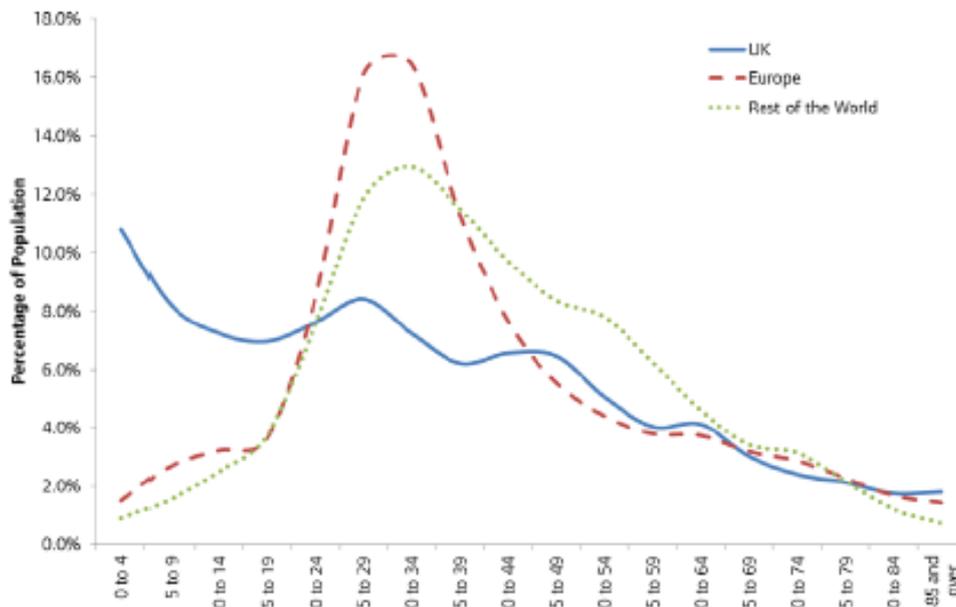
³³ ibid

³⁴ ibid

³⁵ ibid

³⁶ ibid

Figure 5.4 Age structure by region of birth in London, 2011



Source: Diversity in London GLA

Diversity

5.3.10 Greater London accounts for 41% of the all non-White British residents in England and Wales, whilst only comprising 14.5% of the national population³⁷. The proportion of white British fell by 14.4% between 2001 and 2011³⁸. The 'White Other' group, which contains many of the eastern European migrants increased by 49.4% and the Mixed ethnic group saw a 79.2% increase over the last decade³⁹. The 'other' category which includes the newly created Arab group more than doubled in 2011.

5.3.11 Eighteen out of the top 20 local authorities in the national rankings of proportion of residents that are non-White British, are London boroughs. For example in Newham and Brent over 80 % of the resident population is non-White. The number of London boroughs with more non-white residents than white residents is due to increase in the future. The least diverse boroughs are Havering and Bromley⁴⁰.

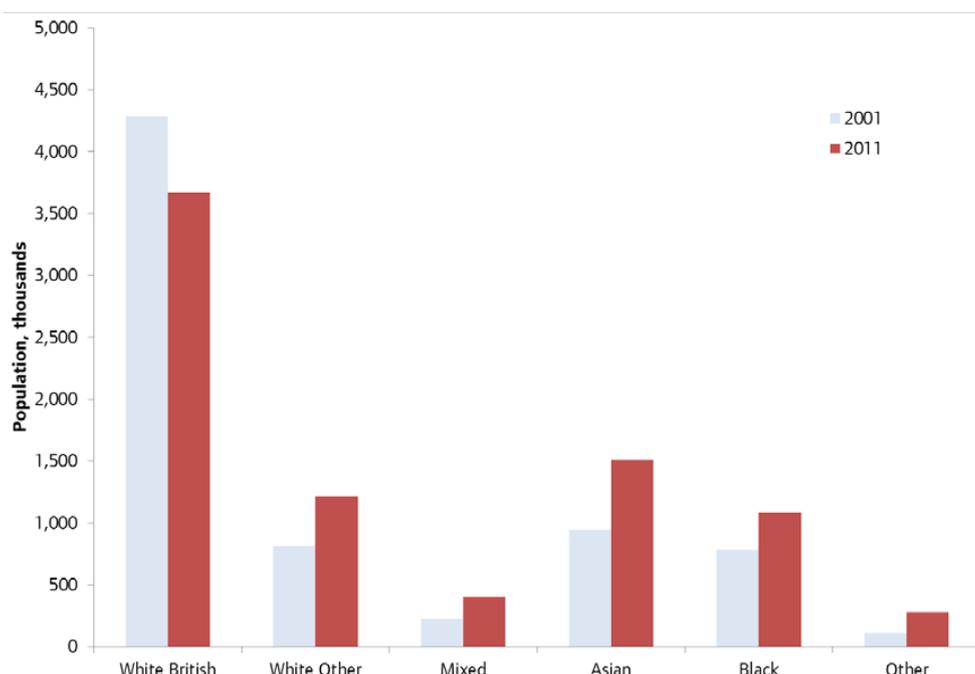
³⁷ Census information scheme. GLA 2013.

³⁸ *ibid*

³⁹ *ibid*

⁴⁰ GLA Intelligence Unit 2013

Figure 5.5: Ethnic Group populations in London, 2001 and 2011



Source: Diversity in London GLA.

Religion

5.3.12 In 2011, 52.9% of Londoners gave Christianity as their religion. This is a fall from 63.8% in 2001, but remains the largest religion in the capital. The second most common religion in London is Islam with 13.5% of Londoners. This is a rise from 9.3% in 2001. The following religions have the next largest representation – 5.5% Hindu, 2% Jewish, 1.7% Sikh, 1.1% Buddhist and 0.6% gave another religion⁴¹.

5.3.13 There has been a considerable change in the distribution of the population based on religious belief. In 2011 only Havering’s population (with a decrease from 82.6% in 2001) was more than 70% (70.3%) Christian compared to seven boroughs in 2001⁴². Islam has the seen the largest overall increase in people between 2001 and 2011 with Tower Hamlets having the largest Muslim proportion in England & Wales (40.8%) followed by Newham (34.2%) and Redbridge (24.9%)⁴³.

5.3.14 Harrow has the highest proportion of Hindus in London (26.9%), followed by Brent (19.1%) and Redbridge (12.1%). Barnet has the highest proportion of Jewish in London (16.6%), followed by Hackney (7%), Harrow (4.7%) and Redbridge (3.9%)⁴⁴.

5.3.15 Hounslow has the biggest proportion of Sikhs with 9.6%, followed by Ealing (8.5%), Hillingdon (7.1%) and Redbridge (6.7%)⁴⁵.

⁴¹ ibid

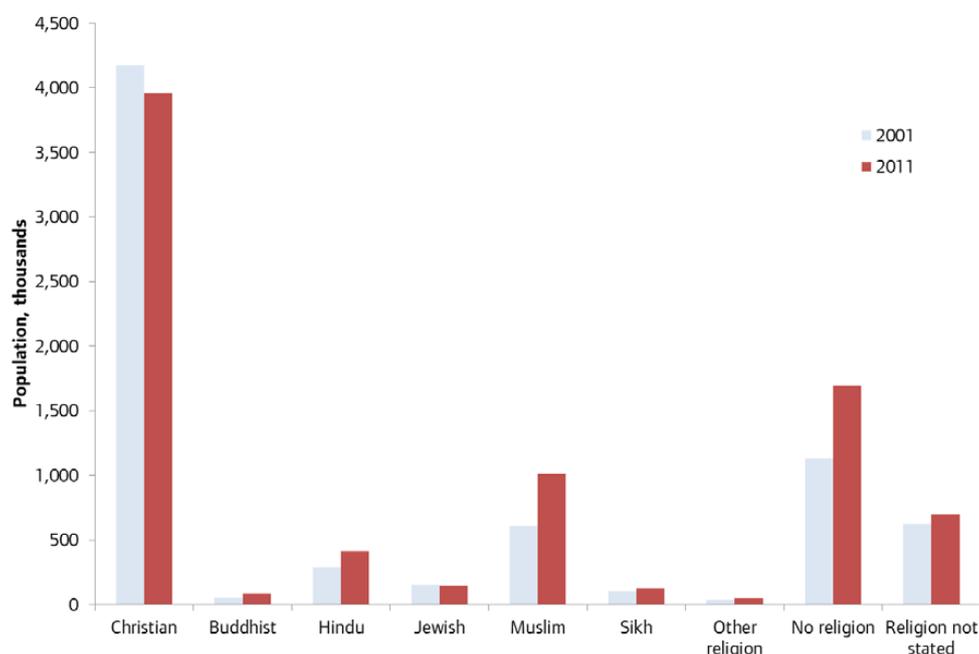
⁴² ibid

⁴³ ibid

⁴⁴ ibid

⁴⁵ ibid

Figure 5.6: Religious group populations in London, 2001 and 2011



Source: Diversity in London GLA

Households and tenure

5.3.16 In 2011 there were 3.27 million households in London, an increase of 250,200 (8.3 %) over the preceding decade. However, population has grown at a greater rate and as a result the average number of people living in each household in London (average household size) rose from 2.35 in 2001 to 2.47 in 2011⁴⁶. The City of London also had the smallest average household size in England and Wales, with 1.6 people. By contrast, Newham had an average household size of 3 people, the largest in England and Wales⁴⁷.

5.3.17 Between 1961 and 1981, both owner occupation and social renting were increasing. By 1981 private renting was the least common form of housing tenure with just 15.1% of households in London in private rent⁴⁸. Between 1981 and 1991 the pattern shifted slightly and while owner occupation continued to grow the proportion of households in the social rented sector shrank for the first time. Over the same period private renting continued to decline but the decrease was considerably less (-525,400 households for 1971-81 and -40,900 households for 1981-91)⁴⁹. Between 1991 and 2001 the rate of increase in owner occupation slowed while the proportion for households in social renting continued to fall.

5.3.18 The 2011 census data shows significant growth (65.5%) in the private rented sector so that it accounts for 26.4% of London's households⁵⁰. The other significant change was that for the first time the proportion of homes in owner occupation decreased. It fell back almost to 1981 levels (48.6% in 1981; 49.5% in 2011)⁵¹. The social rented sector

⁴⁶ Trends in Housing Tenure. GLA Intelligence. 2013

⁴⁷ London data store 2013

⁴⁸ Trends in Housing Tenure. GLA Intelligence. 2013

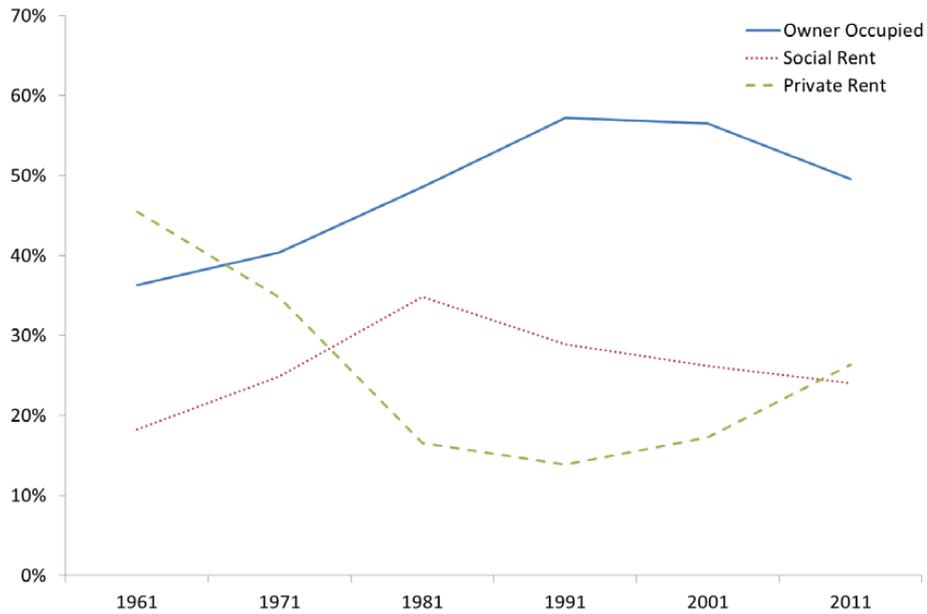
⁴⁹ *ibid*

⁵⁰ *ibid*

⁵¹ *ibid*

contracted again so that in 2011, for the first time since 1971, a greater proportion of households were privately rented than were socially rented.

Figure 5.7: Housing tenure in London, 1961-2011

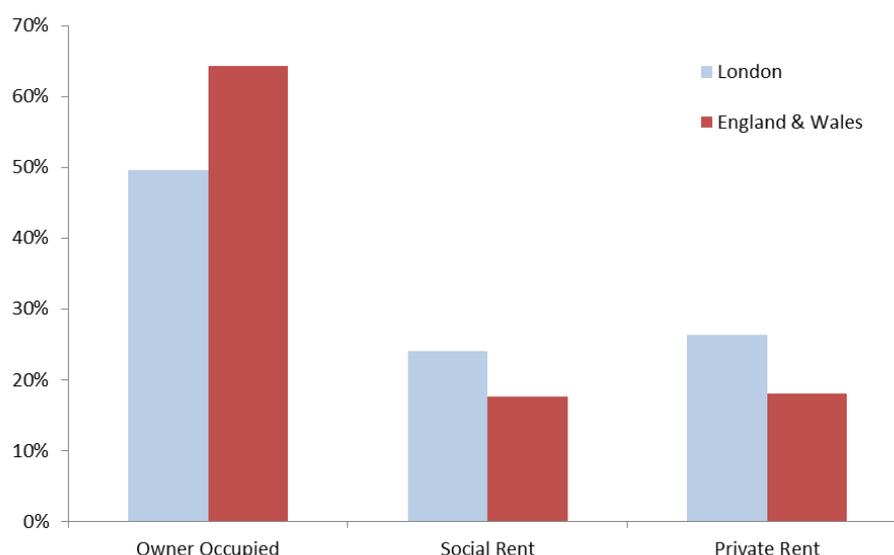


Source: Trends in Housing Tenure

5.3.19 Owner occupation is much less common in London than it is nationally. Just under half (49.5%) of the capital's households are owner occupied while nationally the proportion is almost two thirds (64.3%). As a result London has much more significant private rented and social rented sectors. Social renting in London accounts for 24.1% of households (17.6% in England & Wales) while private renting makes up the remaining 26.4% (18% in England & Wales)⁵².

⁵² *ibid*

Figure 5.8: Housing tenure in London and England & Wales, 2011



Source: Trends in Housing Tenure

5.3.20 Houses accounted for 70.3% of owner occupied properties and 23.9% of socially rented and 38.5% of privately rented properties⁵³. Owner occupied households were most likely to have less than one bedroom per person (76.5%) followed by social rented (63.7 %) and private rented (57.8%)⁵⁴. This reflects the higher likelihood of married, civil partnership and co-habiting couples to be owner occupiers. 34.6% of 'other' accommodation (including flats) were socially rented while 36.8% were privately rented⁵⁵.

Household Composition

5.3.21 Just over 44% of one person households were owner occupied in 2011 up from 30.7% in 2001. Individuals under 65 living alone were more likely to privately rent than those over 65, who were more likely to be in social housing or own their own home⁵⁶.

5.3.22 Just under 65% of married or civil partnership households were owner occupied while co-habiting couple households were 44.1% owner occupied⁵⁷. 49.4% of lone parent households were socially rented⁵⁸. The older a dependent child was the more likely they were to be living in a house as opposed to any other type of accommodation.

Ethnicity

5.3.23. The majority of households, in all ethnic groups in London, lived in accommodation that was neither overcrowded nor under-occupied, based on the number of bedrooms. Overcrowding was greatest in households whose head had Bangladeshi ethnicity at

⁵³ Census information scheme. GLA 2013

⁵⁴ *ibid*

⁵⁵ *ibid*

⁵⁶ *ibid*

⁵⁷ *ibid*

⁵⁸ *ibid*

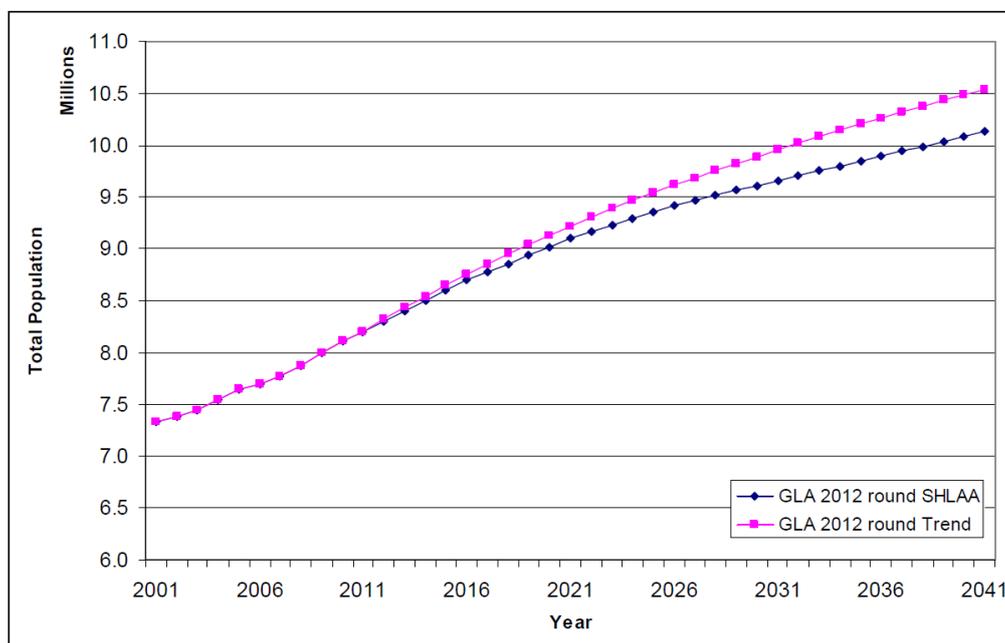
35.8% of households. This was followed by 27% of African, 25.5% of Pakistani and 20.5% of Gypsy and Irish Traveller households being overcrowded⁵⁹.

5.3.24 Just over 66% of Indian, 59.9% of White British, 52.1% of White Irish and 50% of Pakistani households were owner-occupied⁶⁰. The ethnicities with the highest percentage of households in socially rented accommodation are Black Other (52%), Mixed White & Black Caribbean (50%) and Bangladeshi (48.5%)⁶¹. Black Londoners headed 12.7% of all London households but represent 25.2% of socially rented households⁶².

Population and household projections

5.3.25 Given the increase in the base population, the population projections show a much higher levels of population growth than any previous projections produced by the GLA. The GLA has produced both SHLAA and trend based population projections. The SHLAA projections take into account development trajectories and therefore limit population growth, whilst the trend based projections are unconstrained. London’s population is projected to rise from 8.204 million in 2011 to 9.656 (SHLAA) or to 9.953 million (Trend) in 2031; increases of 1.452 and 1.749 million respectively⁶³. This compares to the 2011 round SHLAA projection of growth from 7.991 to 9.055 million, a change of 1.063 million, over the same period. These projections will be rolled forward to 2036 for the FALP.

Figure 5.9: Total Population of Greater London



Source: GLA 2012 round projections

⁵⁹ ibid

⁶⁰ ibid

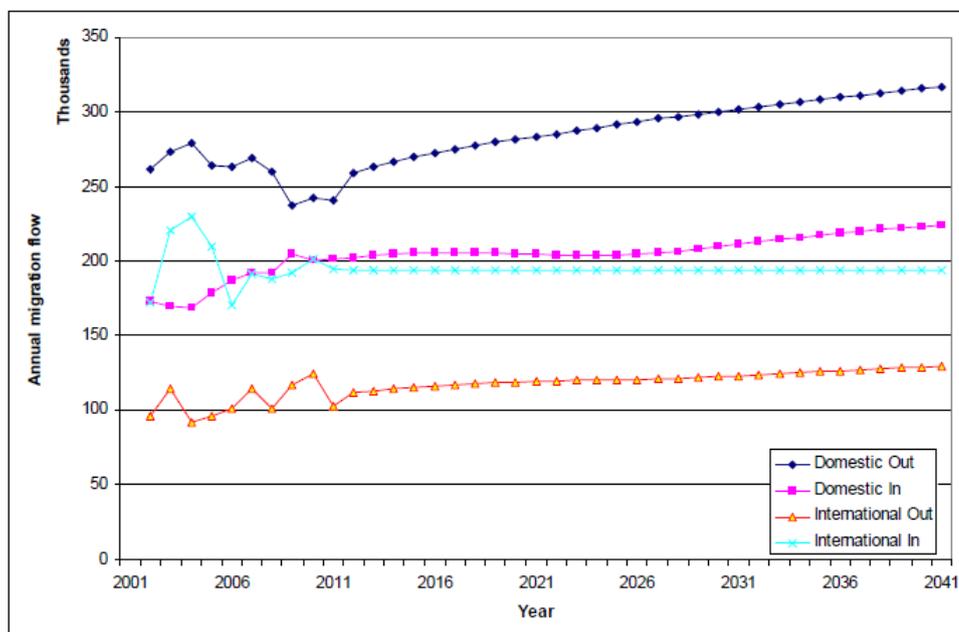
⁶¹ ibid

⁶² ibid

⁶³ GLA 2012 Round Population Projections. GLA Intelligence 2013

- 5.3.26 London’s population is growing due to both natural growth (the differential between births and deaths) and migration. Natural change is the largest contributor to population growth in London. Increases in births and declines in deaths since 2001 have led to a rise in natural change from under 45 thousand in 2001-02 to over 86 thousand in 2010-11⁶⁴.
- 5.3.27 Migration includes domestic (internal UK) flows and international flows. For the trend-based projection, domestic inflows are steady at around 205,000 until 2028. After this point the inflow rises towards 224,000 as a result of increasing population in the rest of the UK. Projected international inflow is held constant at 193,000, an average of the last five years of historic data. Both domestic and international outflows increase as the London population grows over time. Domestic outflows increase from 259,000 in 2011-12 to 317,000 in 2040-41. Over the same period, international outflow increases from 111,000 to 129,000⁶⁵. Due to the changes in EU legislation and the economic constraints international and domestic flows have been variable.
- 5.3.28 It is too early to tell if overall domestic outflow from London will return to historic levels and therefore have a longer term impact on the predicted overall population growth in London. Likewise for international migration. Despite a new cap on migration from non EU countries it is uncertain at what level international immigration will stabilise. Therefore for a number of reasons there is significant level of uncertainty around these current longer term trend projections.

Figure 5.10: Gross migration flows to and from Greater London – trend projection

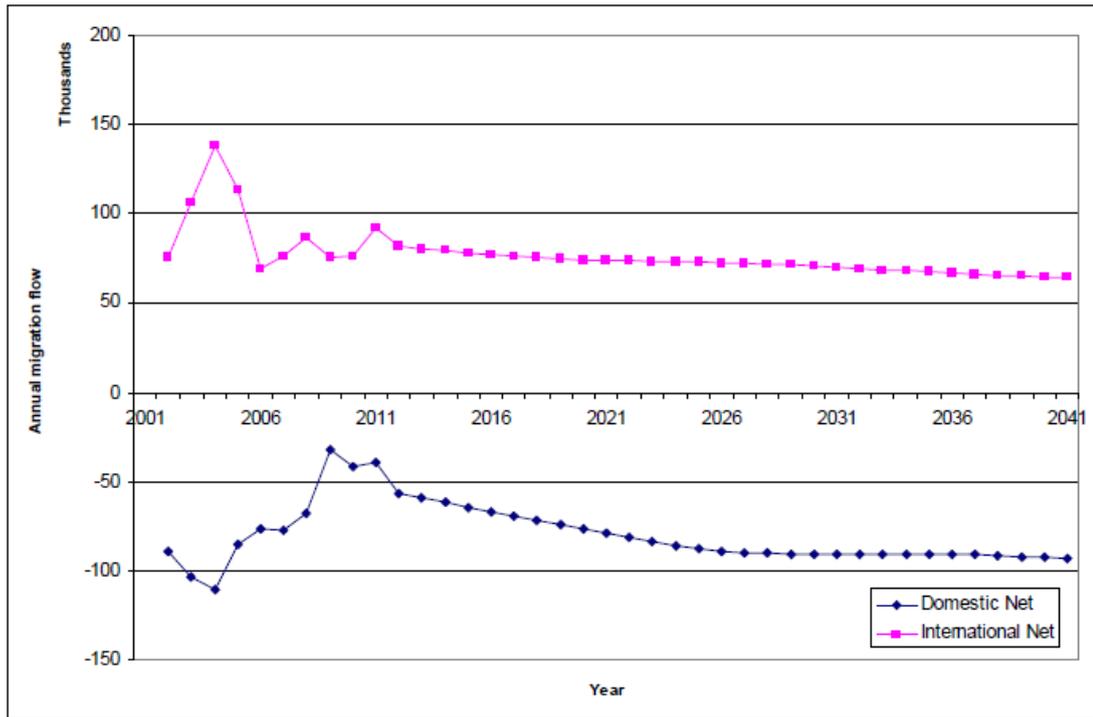


Source: GLA 2012 round projections

⁶⁴ ibid

⁶⁵ ibid

Figure 5.11: Net migration flows for London – trend projection



Source: GLA 2012 round projections

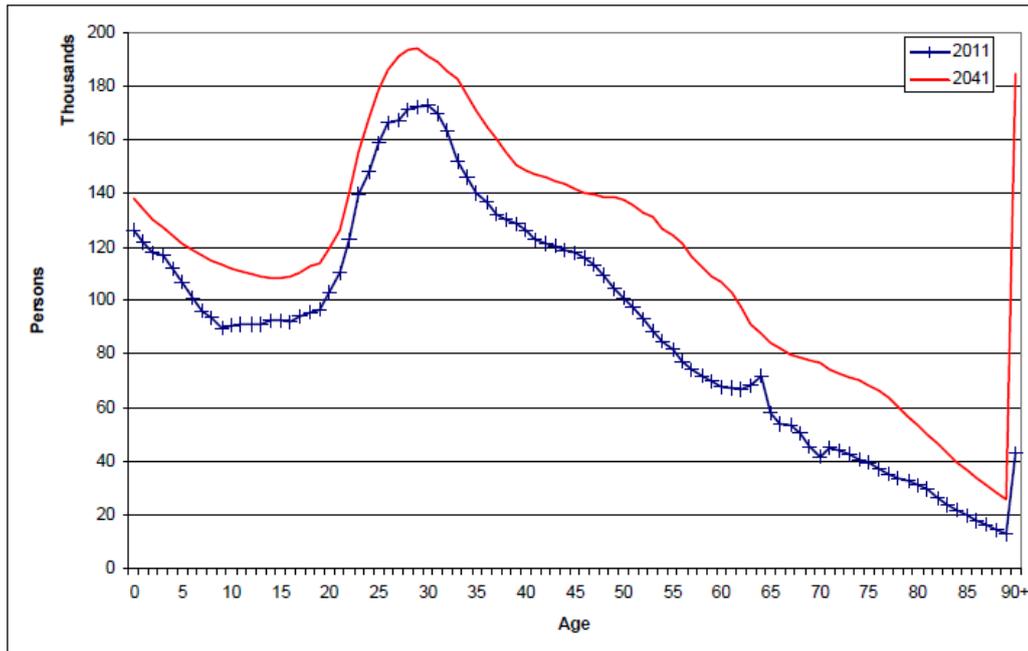
Age structure

5.3.29 The figure below shows the existing age structure and the change to 2041. There is a significant growth in the 65+ population projected growth from 900,000 in 2011 to over 1.5 million by 2041⁶⁶. This growth accelerates towards 2041 as the population of baby boomers begin to reach this age. Rises in the older age groups are accounted for by falling mortality rates and rising life expectancy. However, there is some certainty over this projection as historically some of the over 60s have moved out of London. There is also a projected increase in school-age children in London. This is a consequence of the boom in births from 2002 to 2011, coupled with recent trends of reduced migration outflows from London⁶⁷.

⁶⁶ ibid

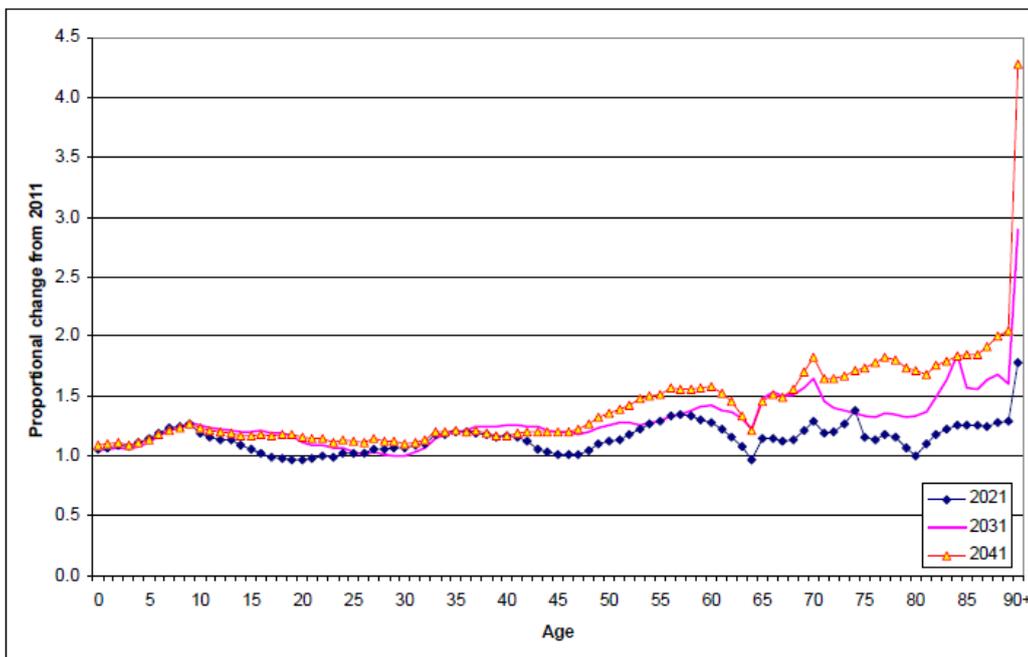
⁶⁷ ibid

Figure 5.12: Trend-based projection – London’s population age structure



Source: GLA 2012 round projections

Figure 5.13: Trend-based projection – London’s proportional changes in age structure relative to 2011



Source: GLA 2012 round projections

Households

5.3.30 This population projection leads to a household projection of 3,948,358 up from 3,278,345⁶⁸ to 2031. This projection is based on the work being carried out for the

⁶⁸ GLA Data Store 2013

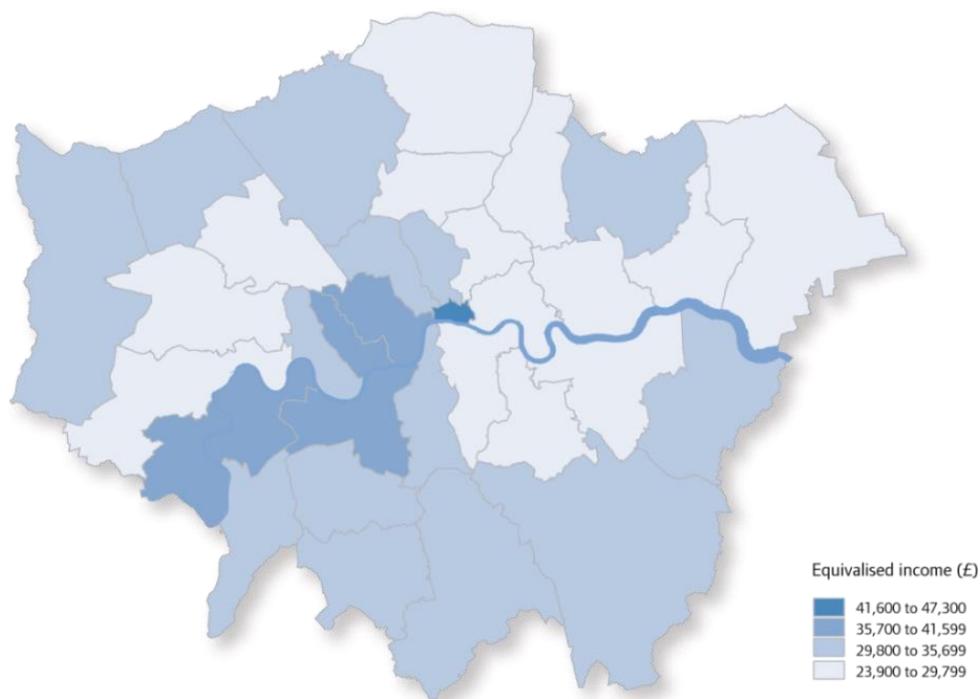
revised Strategic Housing Market Assessment (SHMA) and DCLG’s 2011 household characteristics. Without the constraints of housing delivery and cost, the GLA has projected that there would be 4,130,282 households⁶⁹. The Strategic Housing Market Assessment is also being updated and will roll these projections forward to 2036. This will provide information on the type of housing that is needed in London, including tenure or cost and the number of bedrooms.

Income

5.3.31 The 2010 data⁷⁰ on income shows very little change in recent incomes across London. Residents of 22 boroughs had small increases in their median equivalised income. At the same time 14 boroughs saw an increase by 1% in the percentage of population earning less than an equivalised £15,000.

5.3.32 The income distributions across London are shown below.

Map 5.11 Median equivalised gross annual household income, by ward (£)

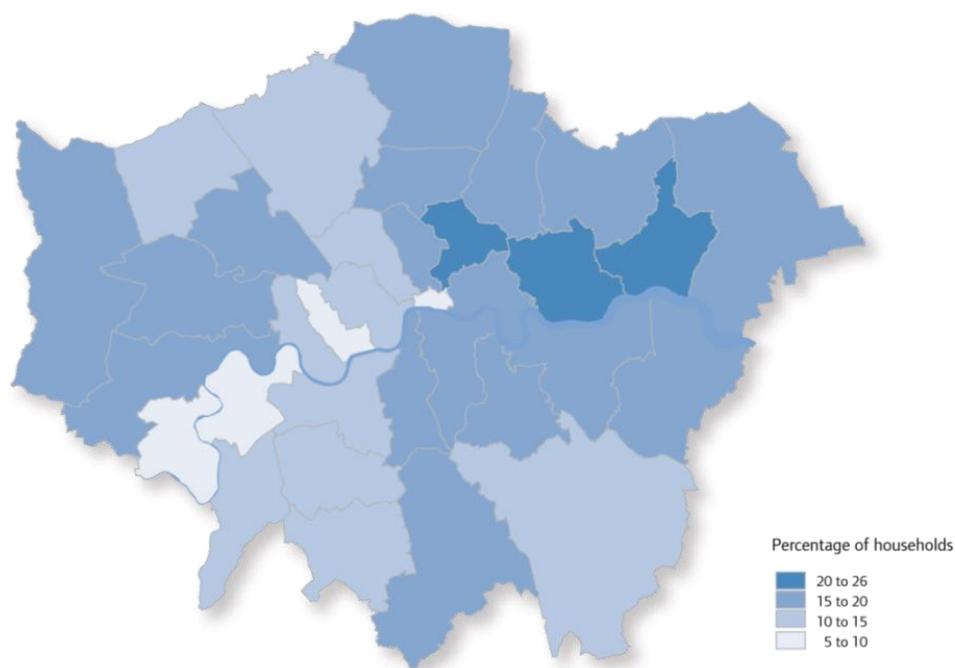


Source: Paycheck 2010; CACI
 © Crown copyright. All rights reserved. Greater London Authority 100032216 (2011)

⁶⁹ *ibid*

⁷⁰ PayCheck 2010. Greater London Authority, 2010

Map 5.11 Percentage of household with equivalised household income of less than £15,000 per year, by ward



Source: Paycheck 2010; CACI
© Crown copyright. All rights reserved. Greater London Authority 100032216 (2011)

5.3.33 The Annual Survey of Hours and Earnings by ONS shows for 2011 the adults of Kensington and Chelsea had the highest total hourly income at £21.57, followed by adults of Richmond at £19.30 and Westminster at £18.69. The boroughs with the lowest paid adults based on totally hour income were Barking and Dagenham at £11.75, Brent at £11.01 and Newham £10.13. This compares to a London average total hourly income of £14.30 and a UK average of £11.10. For London the average total hourly income for 2011 for men was £15.52 and for women £13.22.

Employment

5.3.34 Overall employment in London has fluctuated since the quarter April/June 2007. For May-July 2013 the number of adults employed in London was 3,819,020⁷¹. The employment rate has fluctuated by a few per cent since 2007 with a low of 67.6% for quarter May-Jul 2009 and a high of 70.9% in quarters March-May 2008 and April-June 2008. The latest rate May-July 2013 is 70.5%. This compares to a low of 70.2% in Jul-Sep 2011 for the UK and 70.4% in Jul-Sep 2011 and Sept -Nov 2011 for England⁷².

5.3.35 The employment rate for men in London during May-July 2013 was 77% and for women 63.9%⁷³.

5.3.36 The employment rate for white Londoners is 74.8% and for BAME 60.8%⁷⁴. This breaks down as follows:

⁷¹ London Labour Market Indicators. London data store 2013

⁷² *ibid*

⁷³ *ibid*

⁷⁴ *ibid*

Table 5.8. Employment rates by Ethnicity in London

Ethnicity	Employment rate
Mixed	58.6%
Indian	71.2%
Pakistani/Bangladeshi	53%
Black/Black British	60.7%
Other ethnic group	58.6%

Source: ONS

5.3.37 London is projected to have 5,756,867 jobs in 2036, up from the current 4,959,855 jobs⁷⁵.

Housing demand and delivery

5.3.38 The London Plan identifies London’s housing requirements in the capital as 34,900 per year. This figure will be updated for FALP based on a new London Strategic Housing Land Availability Assessment (SHLAA) and a new Strategic Housing Market Assessment (SHMA). The GLA report Housing: A growing city shows that there was a decline in the number of homes provided in London in 2009/10 through new development, conversions and changes of use, but this is a much smaller drop than other regions across England and represents 19% of the national housing supply. New build housing accounted for 81% of this supply with conversions representing 8% and 11% through changes of use. The decline in residential approvals appears to be abating, falling only 5% to 44,100 and close to the average for the last decade. With capacity for over 198,000⁷⁶ homes in the planning pipeline, London is well placed to tackle future housing needs as it emerges from the recession.

5.3.39 The delivery of new homes has been supported by the Government’s NewBuy scheme which enables purchasers to buy a newly built home⁷⁷ with a deposit of only 5% of the purchase price as long as it will be the purchasers primary residence, but does not need to be their first home. The maximum value of the property is £500,000.

5.3.40 Delivery of affordable housing comprising social rented and intermediate housing remained at record levels accounting for 37 % of conventional housing supply in London for the past five years, falling from 10,763 in 2008/09 to 8,087 in 2011/12. The table below sets out the number of additional new affordable dwellings.

Table 5.9 Net affordable housing completions in London 2007/08 to 2011/12

	Total net affordable conventional completions				
Year	2007/08	2008/09	2009/10	2010/11	2011/12
London	10,231	10,763	9,188	7,319	8,087

Source: London Development Database

⁷⁵ ibid

⁷⁶ At 31 March 2012, from Annual Monitoring Report 9

⁷⁷ From a builder taking part in the scheme

	Affordable as % of total net conventional completions (all tenures)				
Year	2007/08	2008/09	2009/10	2010/11	2011/12
London	36	37	37	39	38

Source: London Development Database

**Table 5.10 Housing Completion trends 2004/05 to 2011/12
(Net dwellings, conventional supply)**

Year	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12
Total	26,649	25,059	27,232	28,223	29,468	24,836	18,991	21,179

Source: London Development Database

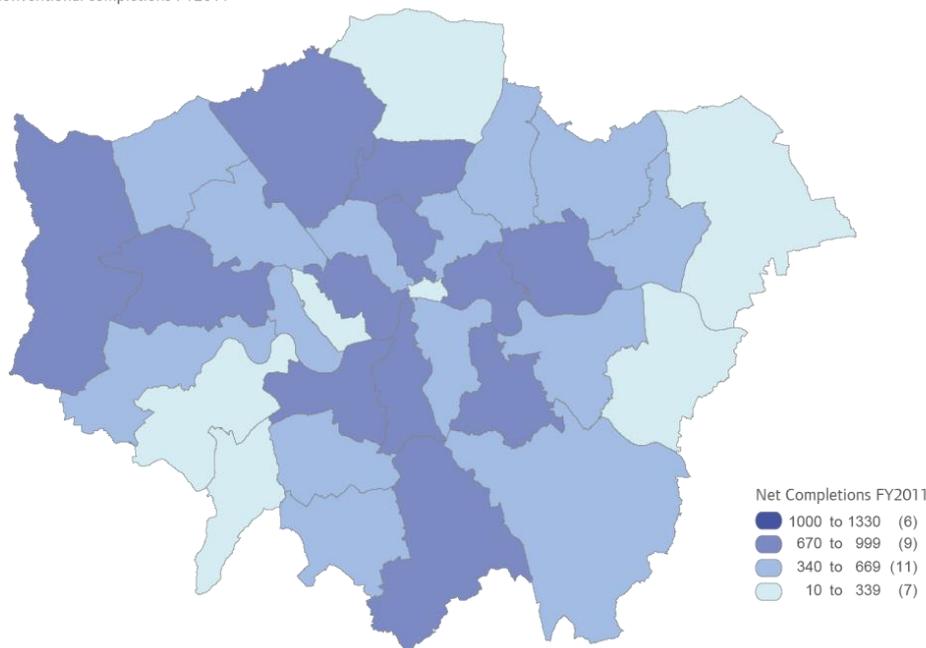
**Table 5.11 Residential planning approval trends 2004/05 to 2011/12
(Net dwellings, conventional supply)**

Year	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12
Approvals	55,466	53,003	57,822	80,445	47,375	45,595	47,980	77,715

Source: London Development Database

Map 5.12 Net completions 2011

Net conventional completions FY2011



Source: The London Development Database/ AMR 9
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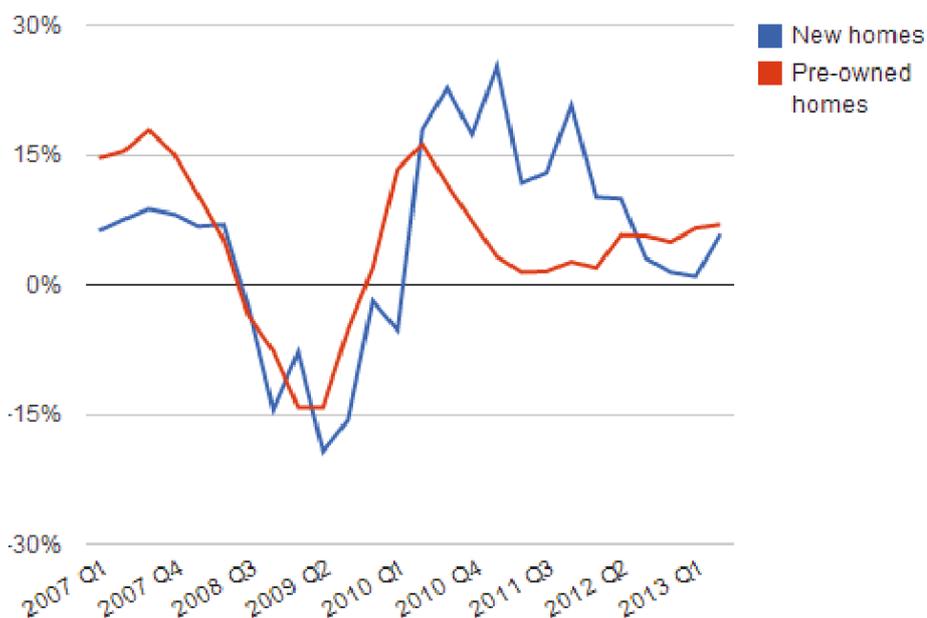
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Housing affordability

5.3.41 The data elsewhere in the report indicates that the economy is improving, but remains slow. On average incomes have not increased and unemployment remains relatively high. Despite this London's houses prices grew by 9.7% in the last year to June 2013,

the highest rate of annualised growth since August 2010⁷⁸. Average private rents also grew by at least 8% for homes of all sizes in London in the last year⁷⁹. At an average monthly cost of £1,300 for a two bedroom property, average private sector rents in London are around twice the national average⁸⁰.

Figure 5.14 : Trend in annual house price change, new and existing homes, London (mix-adjusted prices)



Source: GLA <http://data.london.gov.uk/housingmarket#indices>

5.3.42 The proportion of mortgages in arrears has steadied at a relatively high level of 1.4%⁸¹ but quarterly court orders for mortgage repossessions in London have fallen to nearly 1,000. However orders for landlord possession (both private and social) have risen to nearly 8,000⁸².

⁷⁸ House Price Index ONS

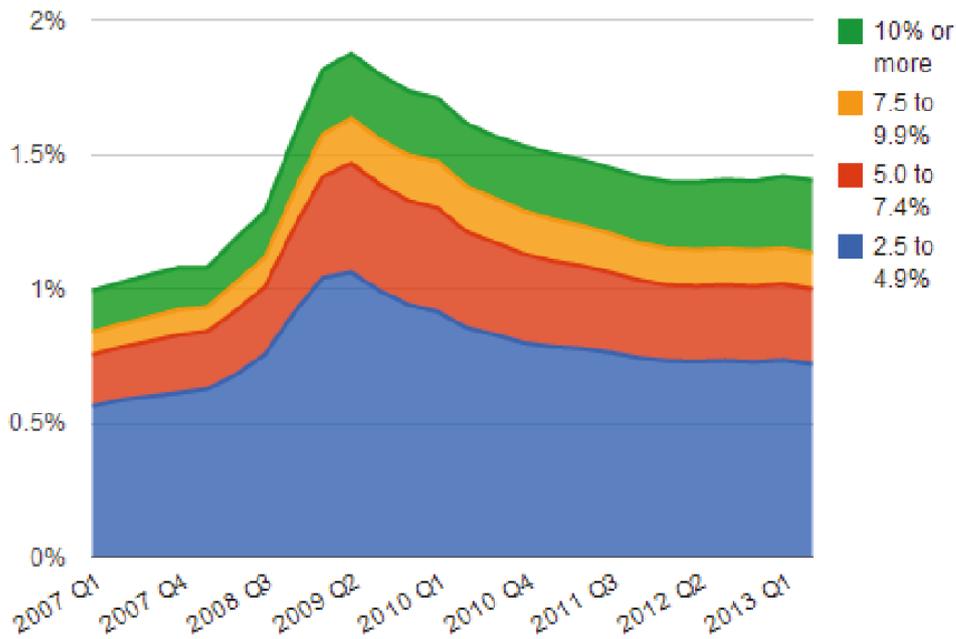
⁷⁹ VOA private rental Market statistics

⁸⁰ *ibid*

⁸¹ CML Mortgage Lending Statistics

⁸² Ministry of Justice, Mortgage and landlord possession statistics

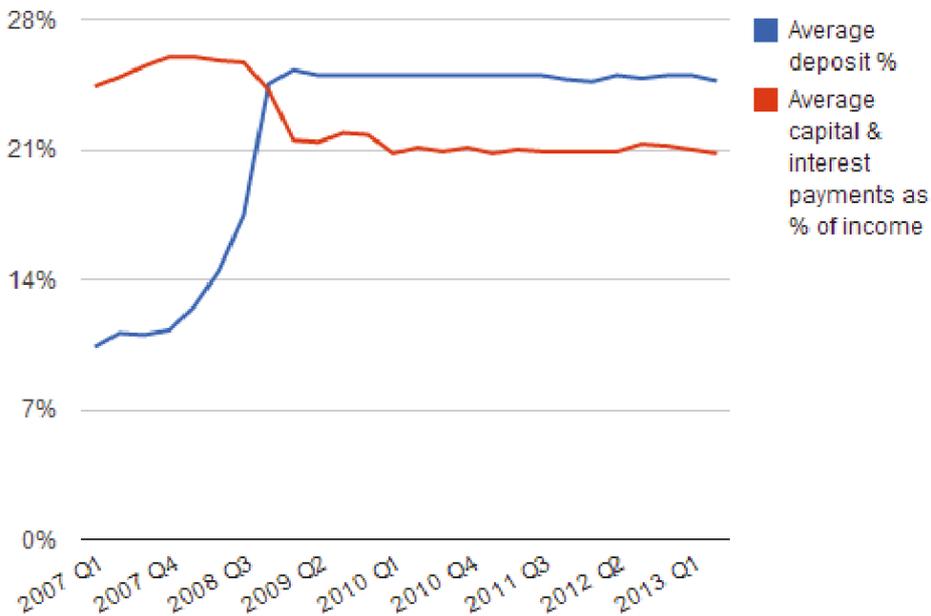
Figure 5.15 Mortgage arrears, by percentage of total balance in arrears, UK



Source: GLA <http://data.london.gov.uk/housingmarket#indices>

5.3.43 Recent months have seen little change in either average first-time buyer deposits or the mortgage payments as a share of income⁸³ and average interest rates remain historically low.

Figure 5.16: Average deposit requirement and interest repayments as a percentage of income for first time buyers, London

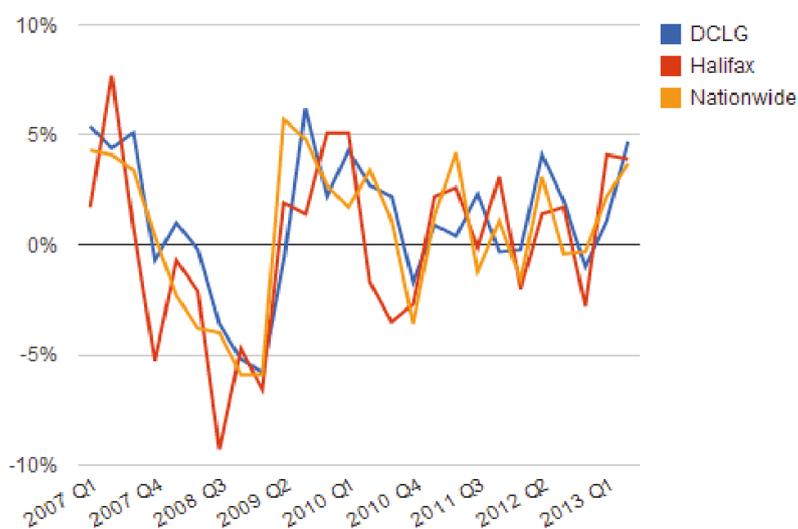


Source: GLA <http://data.london.gov.uk/housingmarket#indices>

⁸³ CML Mortgage Lending Statistics

5.3.44 Monthly home sales remain volatile and well below pre-recession levels⁸⁴. Loans to first time buyers increased in the last year but remain well below 2007 levels⁸⁵. This figure is likely to increase further due to help from the Government's Help to Buy mortgage guarantee scheme. This will enable purchasers to buy a property with a deposit of only 5% of the purchase price. It will be open to both first-time buyers and home movers, therefore potential helping any owners in negative equity. Although recent ONS data shows that house prices in England have exceeded their previous peak in January 2008 and with a maximum sale price of £600,000, in London this could limit its potential use by those wishing to move to larger properties.

Figure 5.17: Prices: Quarterly change in average London house prices - comparison of indices



Source: GLA <http://data.london.gov.uk/housingmarket#indices>

Possible gaps in the information and implications

- 5.3.45 With only a few years of a return to the historic trend of an increase in the overall outflow of people from London, it is too early to suggest if this will have a longer term impact on the predicted overall population growth in London. This could have longer term implications for housing demand in London as well as services including school places. If outflow from London returns to historic trend, housing demand in London is likely to decrease. In addition, long term trends in international migration could vary as Government policy changes on immigration and movements from Europe, which is uncontrolled fluctuate.
- 5.3.46 It is also unclear whether those aged over 60 will continue to leave London as they have done historically, or will choose to remain in the numbers projected. This would have an impact on the type of housing and service required in London.
- 5.3.47 The Government has implemented several schemes to support house building and for people to purchase properties. Changes in national housing and fiscal policy can affect housing delivery, especially of social housing as well as people's ability to buy

⁸⁴ ibid

⁸⁵ ibid

properties. Changes in international economic and political conditions also have a bearing on investment in London's development industry.

5.3.48 The private rented sector plays a large and increasing role in housing provision in London. There are some discussions on whether encouraging institutional investment in this sector could increase the delivery of more housing.

5.3.49 It appears the economy is improving but uncertainty can limit people's willingness to buy or move property, limiting movement in the housing market.

5.3.50 **Potential sustainability issues for consideration in the IIA**

- Managing continued population growth
- Improving and protecting health and well-being
- Equalities
- Delivering appropriate housing

5.3.51 **Potential indicators**

- density of housing development
- an increase in the supply of homes
- increased supply of affordable housing
- ratio of rent to household incomes
- housing stock by tenure
- number of overcrowded households
- number of homeless households
- quality of housing
- number of jobs provided in London
- number of people in work

5.4 LONDON'S ECONOMY

5.4.1 London is a global city competing for jobs internationally on one level, whilst also providing national and local opportunities. It provides a large proportion of the UK's finance and office jobs and also has a strong academic and research sector. However, it provides a relatively lower proportion of manufacturing and industrial type jobs.

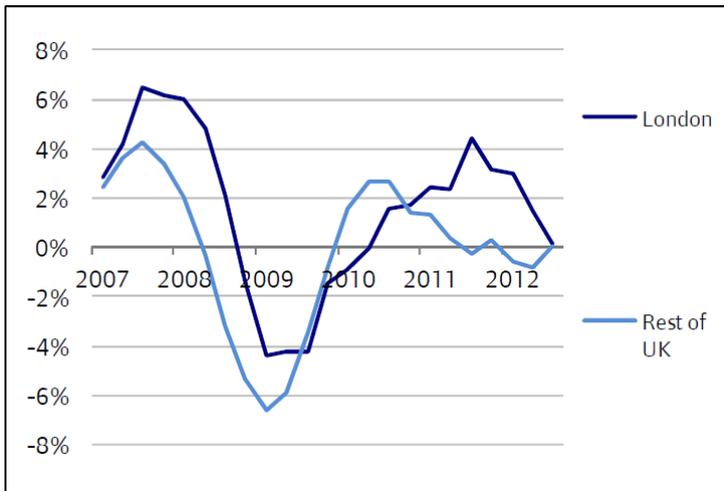
5.4.2 The London Plan 2011 and its IIA report show that London's economy and employment in London have changed significantly over the last 40 years. The employment projections in the Plan to 2031 are based on the assumption that London's economy will grow at the long term national average rate.

Growth

5.4.3 Experian data provided to GLA showed that there was zero real- terms economic growth in London and the rest of the UK in the 12 months to 2012 (Quarter 4)⁸⁶. However the most recent issue of London's Economy Today (September 2013) finds that London's growth in output increased to 1.1% in Q1 of 2013. Businesses also experienced an increase in their output of goods and services in August 2013. Overall London's economy remains weak, but shows signs of improvement.

⁸⁶ London housing market report, Quarter 4 2012. GLA 2013

Figure 5.18: Real GVA growth (year on year), London and rest of UK



Source: Experian data provided to GLA

Employment

- 5.4.4 The total number of jobs in London has increased by 3.9% over the last year, compared with a 1% increase for the UK overall. In the last quarter, the number of employee jobs increased whilst self-employment decreased. The number of jobs in London, both employees and self-employed has increased by 70,000 since the previous quarter (up 1.4%), meaning there was a total of 5,221,000 jobs in London in June 2013⁸⁷. For employees only the figure is 4,400,000. There has been an overall slow increase since September 2010, with a more dramatic increase since the end of 2012.

Figure 5.19: Workforce Jobs

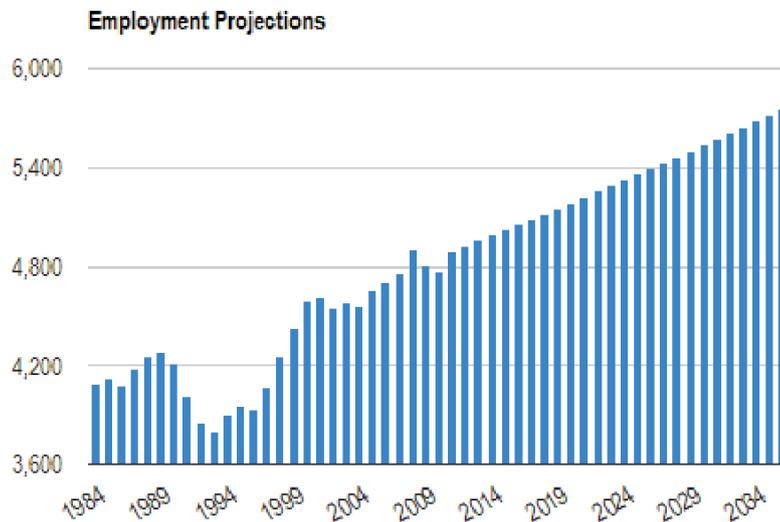


Source: NOMIS

⁸⁷ GLA data store 2013

5.4.5 The number of workers in London is projected to increase by almost 800,000 by 2036 (up 16%) compared with 2013. This is equivalent to about 35,000 more jobs each year⁸⁸.

Figure 5.20: Employment Projections



Source: GLA Economics

Projections

5.4.6 According to 2013 ONS data there were 4,208,000 (employee) jobs in London in 2011. This is projected to increase to 4,861,000 by 2036. Westminster provides the most number of jobs with 608,000 followed by the City of London with 361,000 jobs. These figures are projected to increase to 688,000 and 417,000, respectively.

5.4.7 The London Employment Sites Database (LESD) Final Report 2013 shows the boroughs with the largest development capacity in LESD 2012 are Tower Hamlets, Newham, City of London and Camden. These are also the boroughs with the largest office development pipeline.

5.4.8 The LESD also identifies sites with a planned capacity of over 18,000 industrial jobs. The largest gains are expected in Lewisham, Greenwich, Newham and Barking and Dagenham.

5.4.9 The LESD identifies capacity for over 65,300 new retail jobs in London. The largest growth is expected in Newham and many of these jobs came forward in 2011 with the opening of Westfield Stratford City. Other Boroughs with high retail capacity are Barnet, Southwark and Hammersmith and Fulham.

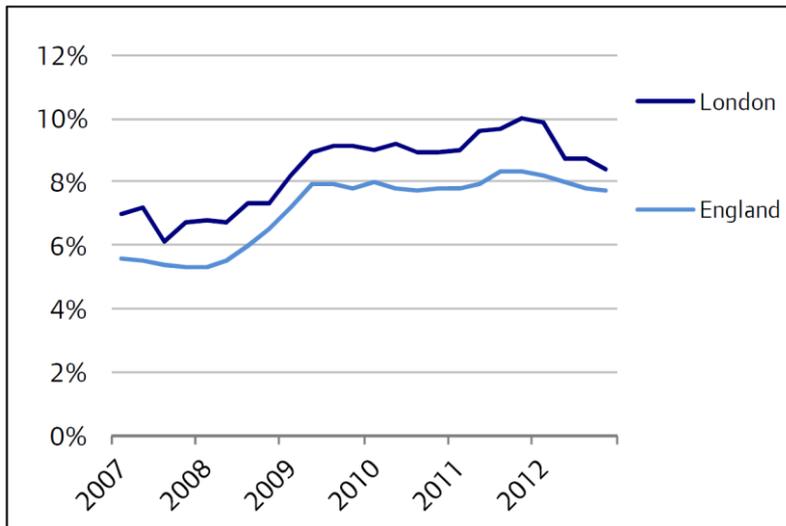
5.4.10 The LESD 2012 estimates that the Opportunity Areas (OAs) and Areas of Intensification (AOIs) will provide a total capacity of 463,500 jobs or 69% of the total LESD 2012. This is less than the capacity of 521,500 jobs in the LESD 2009.

⁸⁸ *ibid*

Unemployment

5.4.11 The London unemployment rate fell to 8.3% in July 2013, and equates to 359,000 people looking for work, about 17,000 less in July compared with the month previous⁸⁹. The unemployment rate in London is 0.6 percentage points lower than a year ago, with the UK as a whole experiencing a drop of 0.4 percentage points.

Figure 5.21: Quarterly unemployment rate (ILO definition), London and England



Source: ONS Labour Market Statistics

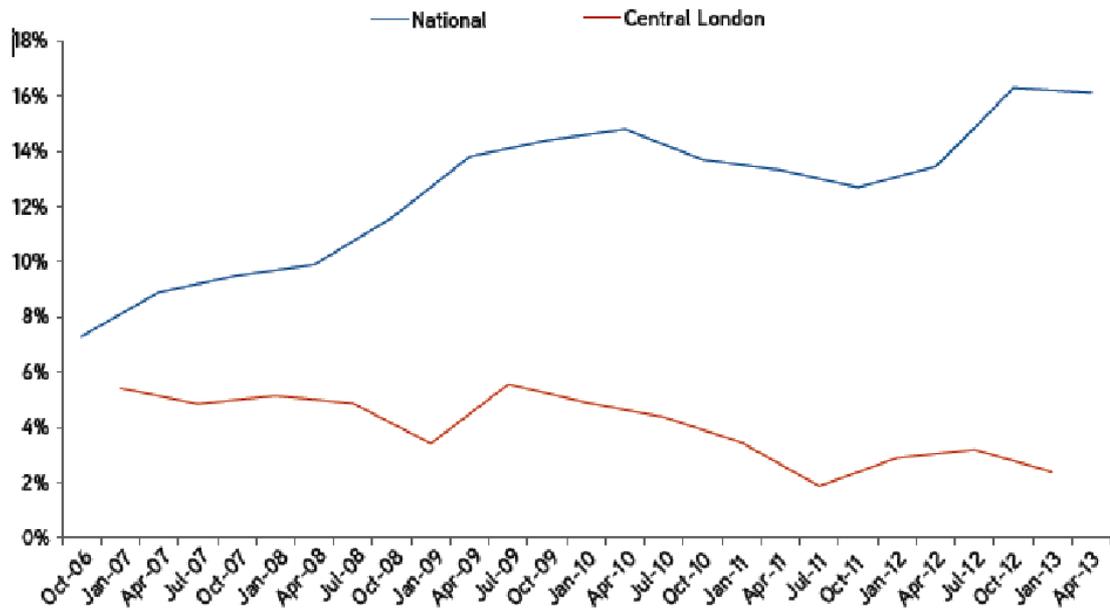
Retail

5.4.12 The demand for retail floorspace in London, and especially central London continues to be higher than the rest of the country. The 'gap' between UK and Central London void rates widened from 1.9% in January 2007 to 11.4% in July 2011. The gap reduced to 9.8% in January 2012, but despite voids increasing in London before stabilising, the gap to national voids increased again to 10.2% in July 2012.

5.4.13. Of 15 centres monitored since October 2008, Oxford Circus generally had the lowest void rate by floorspace and units, with only Kensington High Street performing better in one six month period. The highest vacancy rate was 1.3% of floorspace in October 2009. In the future, it is anticipated that there could be changes in the demand for floorspace. Partially in response to the projected increase in internet shopping there could be a significant contraction in the demand for extra floorspace for comparison goods.

⁸⁹ ibid

Figure 5.22: Number of vacant units as % of total number of units



Source: Colliers International

Possible gaps in the information and implications

5.4.14 As the available forecasts are relatively short term in this time of uncertainty it is too early to determine whether there have been any structural shifts in the economy beyond those identified in the London Plan. This could result in the uncertainty for the demand in certain types of employment space.

5.4.15 In addition, the economy is changing slowly. There is increasing demand for employment space in the technology sector. The GLA will need to continue to monitor the demand for various types of employment space to ensure appropriate employment space is protected and provided and a reasonable cost to ensure London remains internationally and UK wide competitive.

5.4.16 In 2013, the Government bought in permitted development rights to enable the change of use from office to residential without the need for planning permission, and require only prior approval. In London exemptions from these rights were extended to the Central Activities Zone, the Royal Docks, parts of Hackney and Kensington and Chelsea. Several London boroughs also sought exemptions but were unsuccessful. There is concern that given the current increase in house prices and the slow growth of the economy there will be a significant loss of employment floorspace that support the wider London economy and provide local jobs if the policy response is not planned as part of delivering residential- led mixed use intensification redevelopments. In the long term this could undermine London's economy, if when the economy improves employment space is too expensive due to scarcity. The GLA will monitor the loss of employment floorspace.

5.4.17 Potential issues for consideration in the IIA

- Development and regeneration
- Economic development
- Improving and protecting health and well-being
- Equalities

5.4.18 Potential indicators

- household income
- household expenditure on rent or mortgage
- loss of employment floorspace
- provision of employment space by type

5.5 LONDON'S RESPONSE TO CLIMATE CHANGE

- 5.5.1 The International Panel on Climate Change has recently released its latest report⁹⁰ on climate change. The findings state that the combined average land and ocean surface data show a temperature rise of 0.85°C over the period 1880–2012.
- 5.5.2 The computer climate simulations indicate that global surface temperature change for the end of the 21st Century is "likely" to exceed 1.5°C relative to the period 1850–1900 for all but one of the greenhouse gas emissions scenarios.
- 5.5.3 If carbon dioxide in the atmosphere doubles, it is likely to result in a change in the climate of between 1.5°C and 4.5°C. The lower bound of this range has fallen from 2.0°C compared with the IPCC's 2007 report.
- 5.5.4 The report suggests that sea level rise will proceed more quickly than it has done over the past 40 years. Global mean sea level rise for 2081–2100 is projected to be between 26cm (at the low end) and 82cm (at the high end), depending on the greenhouse emissions path this century.
- 5.5.5 The London State of the Environment Report 2011 provides a broad range of details for environmental conditions in London. This report was refreshed in 2013⁹¹ through an update of the indicators, where updated data was available. Also in 2013, the Environment Agency released updated London Borough Environmental Fact Sheets.
- 5.5.6 To support the London Plan 2011, a draft Sustainable Design and Construction Supplementary Planning Guidance was published for consultation in July 2013. The final document is likely to be published in 2014.

Greenhouse gas emissions

- 5.5.7 The London Energy and Greenhouse Gas Inventory (LEGGI) shows greenhouse gas emissions and energy consumption for London. LEGGI 2008 is a database of geographically referenced datasets of energy consumption within the Greater London area and estimates the quantity of resulting greenhouse gases (GHG) – carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆) – emitted into the air. It is the new method of measuring greenhouse gas emissions for London. Table 5.12 below shows the latest (2011) available emissions for carbon dioxide for London.

⁹⁰ Climate Change 2013: The Physical Science Basis. The International Panel on Climate Change. 2013

⁹¹ <http://data.london.gov.uk/documents/SOE-2013-report.pdf>

Table 5.12: Carbon dioxide emissions for London 1990 - 2011

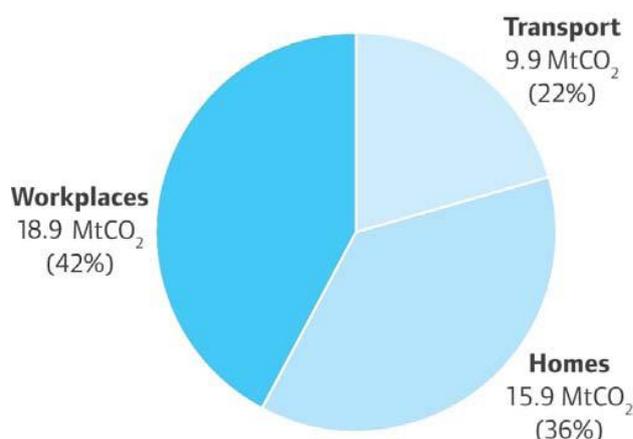
CO2 Emissions (MtCO2)						
1990	2000	2001	2002	2003	2004	2005
45.05	50.31	48.86	48.93	49.01	46.56	46.40

CO2 Emissions (MtCO2)						
1990	2006	2007	2008	2009	2010	2011
45.05	47.64	46.48	46.67	42.52	44.26	40.20

5.5.8 This confirms increases in greenhouse gas emissions during the 1990s generally followed by a stabilisation in emissions, with more significant drops in 2004, 2009 and 2011.

5.5.9 The chart below shows the share of emissions. They have decreased from the domestic sector, but increased in the commercial sector.

Figure 5.23 Percentage of carbon dioxide emissions by sector



5.5.10 In line with London Plan 2011 policy 5.2 regarding the carbon dioxide targets and carbon off-setting, several boroughs have established carbon-dioxide off-setting funds.

5.5.11 The Mayor's Climate Change Mitigation and Energy Strategy was published in October 2011. The Mayor has several projects aimed at reducing carbon dioxide emissions across London. These include:

- RE:NEW – to retro-fit domestic buildings
- RE:FIT – to retro-fit public sector buildings
- DEPDU – the GLA's Decentralised Energy Programme Delivery Unit is to provide services to help develop and bring to market decentralised energy schemes
- The Low Carbon Prize seeks innovative ideas from London's students to help slash London's CO₂ emissions by 60 % by 2025
- London Hydrogen Partnership is working to bring this technology forward in the capital so as to improve energy security and air quality, reduce greenhouse gases and noise, and support London's green economy.

Licence lite

- 5.5.12 The Mayor is the first authority in the country to apply to Ofgem for a new type of electricity supply licence. Initially it will allow the Greater London Authority to buy excess electricity produced by London's boroughs and public bodies before selling it on, at cost price, to other public sector organisations, such as Transport for London, the Met Police and NHS hospitals. If the scheme proves successful the Mayor plans to extend it to include private sector energy producers in London as well. Increasing revenues for smaller generators will improve the viability of local energy projects in London and spark an investment boom in the capital's low carbon energy infrastructure. In the short term, it could help bring in more than £300 million worth of investment for 22 heat and power projects already in the pipeline. In the longer term, it could help generate over £8 billion of investment and around 850 jobs a year until 2025.
- 5.5.13 Twelve boroughs already have schemes which could benefit. Together they are capable of generating around 76 megawatts of electricity – that's equivalent to the power used by about 76,000 homes. These types of schemes primarily heat local buildings through the electricity generating process. For example, Islington's Bunhill Heat and Power project uses a gas engine to warm hundreds of homes and local swimming baths. Westminster's Pimlico District Heating Undertaking heats thousands of homes, commercial premises and three schools through two gas engines.

Water supply

- 5.5.14 Thames Water has prepared its Resource Water Management Plan 2015-2040 which sets out how it will ensure that an adequate supply of water is maintained to its catchment, which includes most of London. Measures identified include trading less water to other providers, reducing leaks, metering. More long term measures could include treating and re-recycling waste water and building a reservoir. The GLA will aim to ensure that Thames Water takes into account the latest population projections.

Adaptation

- 5.5.15 Due to the long time scales associated with climate change we know that London will experience some of the impacts associated with the predicted changes to the climate. The London Plan sets out some of the effects anticipated due to climate change. These are based on the latest UK Climate Projections 2009 (UKCP09).

The Mayor's Climate Change Adaptation Strategy and Water Strategy were published in October 2011. The GLA has been working with the boroughs and the Environment Agency to identify areas with the potential to be susceptible to surface water flooding. This Drain London project is currently working on producing a series of maps to support project work on addressing the concerns. Strategies to encourage urban greening across London are also being developed, particularly community projects for street trees and for green roofs in the CAZ. Major green infrastructure projects are also being supported by the Mayor, for example in the Wandle Valley Regional Park.

Flooding

5.5.16 London has just over 536,000 properties in the floodplain. Around 30,000 of these are in areas which have a significant likelihood of flooding, mainly from rivers⁹². The Mayor's Drain London Project is finalising its mapping work. The London Regional Flood Risk Assessment is being updated to inform these alterations.

Water quality

5.5.17 Of the 47 rivers in London, one was classified as having 'good' ecological status, 30 as 'moderate' and 16, 'poor' (2009)⁹³. The water quality of the Thames Estuary is threatened by discharges of storm sewage and combined sewer overflows, which occur after heavy rainfall. On average, approximately 39 million tonnes of storm sewage are discharged into the Thames Estuary each year⁹⁴.

Waste

5.5.18 The London Plan seeks to support London in managing as much of its own waste as possible. The London Plan and the Mayor's Business and Waste Strategy for London include waste projections for London up to 2031.

Table 5.13: London's waste projections (tonnes pa)

Source	2020/21	2031
Municipal	4,709,000	5,108,000
Commercial / industrial	6,458,000	6,596,000
Construction and demolition	10,512,000	11,093,00

⁹² London's Environment Revealed. State of the Environment Report for London 2011. Data updates 2013. Environment Agency, Natural England, Forestry Commission England, Mayor of London. 2013

⁹³ ibid

⁹⁴ ibid

Figure 5.24: Waste streams

Figure 1 Proportion of waste streams by origin in London, 2008

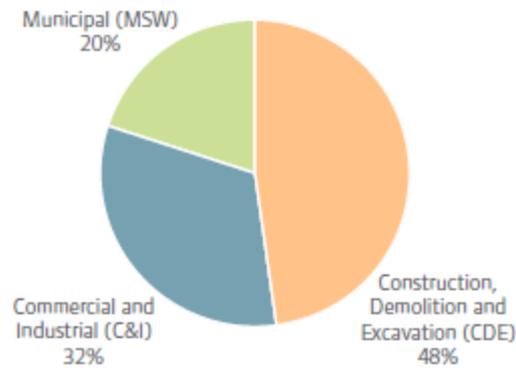
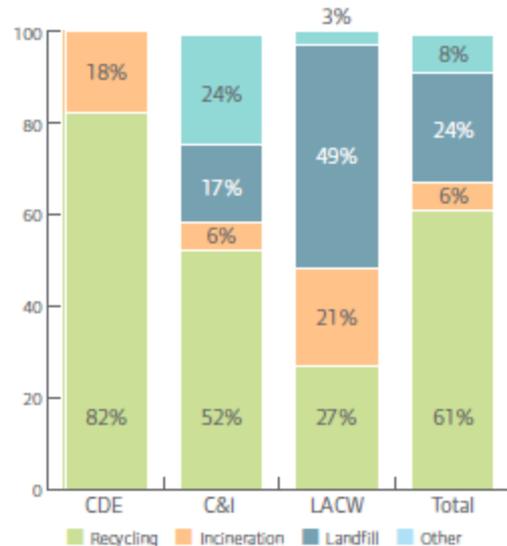


Figure 2 Breakdown of London's waste management methods



Source: Making Business sense of waste. Nov 2011

5.5.19 As part of the alterations these projections will be updated using the new data and rolled forward to 2036.

Possible gaps in the information and implications

5.5.20 It is not known how sustainable (eg energy and water consumption, use of materials) schemes of all sizes are across London. Whilst schemes are to comply with the Building Regulations and some boroughs seek compliance with other standards such as the Code for Sustainable Homes or the British Research Establishment's Environmental Assessment Model (BREEAM), there is no consistent monitoring of these standards across London, including completed developments.

5.5.21 In addition, there is evidence⁹⁵ that not all developments perform to the standards they are designed to. There are several monitoring projects to try to tackle this issue.

5.5.22 The Government is consulting on its Housing Standards Review. As published this would prevent London applying its carbon dioxide targets which seek a significant improvement beyond the Building Regulations. It is unclear whether this will also result in a decline in the investment in district heating and undermine Mayor's target that 25% of London's energy is generated locally by 2025. The consultation also recommends removing the Code for Sustainable Homes and preventing the specification of internal requirements. This could impact water efficiency, waste management, the use of sustainable materials and air quality.

5.5.23 The Government has also consulted on its proposals for the Allowable Solutions element of Zero Carbon which is due to come in for housing in 2016. As set out there is concern that in London this would result in less carbon dioxide savings on-site, and the

⁹⁵ Carbon compliance for tomorrow's new homes. A review of the modelling tool and assumptions. Topic 4 - closing the gap between designed and built performance. Zero Carbon Hub and NHBf. 2010

Allowable Solution payment would not be spent in London reducing London's ability to reduce its carbon emissions as well as invest in wider benefits such as reducing fuel poverty, low carbon energy infrastructure and air quality improvements.

5.5.24 It is uncertain how increasing energy prices and the change in the generation of energy will affect London's carbon dioxide emissions.

5.5.25 Due to these uncertainties over the Government's approach to how development can respond to climate change mitigation there are minimal alterations proposed to this section of the Plan.

5.5.26 **Potential issues for consideration in the IIA**

- Improving and protecting health and well-being
- Equalities
- Responding to climate change

5.5.27 **Potential indicators**

- development taking place on previously developed land
- level of green houses gases - carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆) - emitted into the air
- water consumption rates
- municipal waste levels, levels recycled or composted
- number of homes, developments approved in flood prone areas

5.6 **LONDON'S TRANSPORT**

The number of trips across London

5.6.1 The Annual Monitoring Report 9 2011/12 identifies that the total daily journey stages in 2011 were 29.9 million, up from 29.3 million in 2010, and 4.3 million higher than in 2001. Of these stages, 34% were by private transport, and 43% by public transport. Since 2001, use of public transport per head has grown by over 30%, and increased by over 3% in the latest year. In contrast, private transport use per head has decreased by 17% since 2001, and is down almost 2% in the latest year. Public transport use per head continues to grow at a faster rate than private transport, which continues to fall year on year.

5.6.2 The Emirates Air Line cable car service began in 28 June 2012. The number of passengers carried by this service peaked in mid August 2012 with the service carrying 180,804 passengers in a week. Figures were high for the four weeks of the Olympics and ParaOlympic Games. A year later the figures was 23,466, which represents one of the weeks with the fewest passengers for some time. The area serviced by the Emirates Air Line cable car is projected to provide a significant number of new homes and jobs in the future.

5.6.3 TfL has produced forecasts of trips for 2021 and 2031 that indicate the levels of growth from 2007 levels.

Table 5.14: Growth forecasts

Type of growth from 2007 base	to 2021 ⁱ	to 2031 ⁱ
Daily trips (with one end at home) within London	10%	17%
Daily public transport trips within London	17%	30%
Rail passenger kilometres	14%	32%
Underground passenger kilometres	18%	22%

(i) the percentage of motorised trips undertaken by public transport

Source: TfL

- 5.6.4 Table 5.14 above shows that despite the growth in trips, due to existing planned and funded transport infrastructure crowding levels on both rail and Underground services are forecast to reduce from the 2007 base to 2021 and then to increase to 2031. This reflects the impact of the additional committed schemes in the rail and Underground networks through to 2021 and the lower level of commitments beyond 2021⁹⁶.
- 5.6.5 Crossrail is under construction. A funding arrangement has been agreed for the Northern Line extension to Vauxhall Nice Elms. HS2, which extends beyond London's boundary is under development and proposals for Crossrail2 have been consulted earlier this year.
- 5.6.6 The number of trips made by bicycle continue to increase. There has been a 53% increase in the number of trips made by bicycle since 2001, increasing the share of trips made by bicycle to 1.9%.

Table 5.15: Cycle journey stages and mode shares, 2000 to 2011

Year	Daily Cycle stages (millions)	Cycle mode share (percentage)
2001	0.32	1.2
2002	0.32	1.2
2003	0.37	1.4
2004	0.38	1.4
2005	0.41	1.6
2006	0.47	1.7
2007	0.47	1.6
2008	0.49	1.7
2009	0.51	1.8
2010	0.54	1.9
2011	0.57	1.9

Source: TfL Planning, Travel in London

⁹⁶ Crossrail 2: Summary of Option Development. AECOM for TfL. 2013

Possible gaps in the information and implications

5.6.7 There is no uniform information as to cycle rates across individual boroughs. Given the strong increase measured across TLRN roads and strategic support for cycling this has no implication to the proposed change to cycle parking standards.

5.6.8 Potential issues for consideration in the IIA

- Managing continued population growth
- Improving and protecting health and wellbeing
- Equalities
- Delivering appropriate housing
- Responding to climate change
- Increasing transport accessibility
- Improving air quality

5.6.9 Potential indicators

- reduction in traffic
- increased modal share in cycling
- increased number of cyclists

5.7 LONDON'S QUALITY OF LIFE

Poverty

Child

5.7.1 Although rates have fallen, more than a third of London's children are in households with income below the poverty line. The poverty rate for children in London, after housing costs, remains higher than for any other region, but is at its lowest level for 16 years⁹⁷.

5.7.2 Child Poverty in the UK is measured as the proportion of children living in households with disposable income below 60% of the median of the national income distribution for households, after equivalisation (taking account of differences in household size and composition).

5.7.3 In the latest figures London has seen a decrease over the previous figures in the percentage of children in poverty, both before (2% lower) and after housing costs (1% lower), matching those seen in the national figures. While the percentage of London's children in poverty before housing costs is now below the UK-wide figure, after housing costs are taken into account, the London child poverty level remains very high – still above those seen at any point in the last 16 years nationally⁹⁸.

5.7.3 Children in certain ethnic groups, those with lone parents (mostly women) and in households with at least one disabled adult are more likely to be living in poverty. The highest rates in London were for children in Pakistani and Bangladeshi households (64%), and Black and Non-Caribbean households (56%). Overall in London 56% of

⁹⁷ Poverty Figures for London: 2011/12. GLA Intelligence. 2013

⁹⁸ *ibid*

children live in poverty. 54% of children with at least one disabled adult live in poverty, compared with 34% of children in households with no disabled members. There has been little change in these proportions⁹⁹.

- 5.7.4 The child poverty rate is much higher for those living in social housing (61%) and in private rented housing (57%) than those living in owner occupied housing (20%)¹⁰⁰.

Working age

- 5.7.5 The latest poverty figures show that working age poverty has decreased in line with the decrease in poverty rates among children in London. The proportions of people of working age in households in poverty are lower than for children. The latest figures for the London proportion of working age adults living in poverty using both the Before and After Housing Costs measures have fallen slightly, due to a decrease in Outer London, whereas the latest Inner London and national figures have stayed the same as for the previous year.

- 5.7.6 The gap between the child and working age poverty rates Before Housing Costs has remained constant, with the child poverty rates three percentage points higher than those for working age people both nationally and within London¹⁰¹. For the after housing costs measure the gap is greater in London than the UK average, with both Inner and Outer London poverty rates nine percentage points higher for children than working-age adults, whereas the UK difference is seven percentage points¹⁰².

Pensioner

- 5.7.7 Poverty among pensioners is higher than among people of working age but lower than for children on a before housing costs basis, and for the first time, the latest figures show lower rates of pensioner poverty in Inner London than in Outer London, using the before housing costs measure.
- 5.7.8 Poverty among pensioners in Inner London has fallen, but it is the only part of the UK where the pensioner poverty rate after taking housing costs into account is higher than using the before housing costs measure. In Outer London, the figures follow the national trend, with only marginal difference from the previous year's rates and with pensioners more likely to be in poverty using the before housing costs measure. London's overall pensioner poverty rates show a slight decrease on those for the previous year.
- 5.7.9 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%. A higher proportion of pensioners from BAME groups live in poverty (27-30%) and those living in social housing or private rented accommodation (both 32%) are twice as likely to be living in poverty than those in owner occupied housing (16%)¹⁰³.

⁹⁹ DWP, Households below Average Income Reports, April 2011

¹⁰⁰ DWP, Households below Average Income Reports, April 2011

¹⁰¹ Poverty Figures for London: 2011/12. GLA Intelligence. 2013

¹⁰² *ibid*

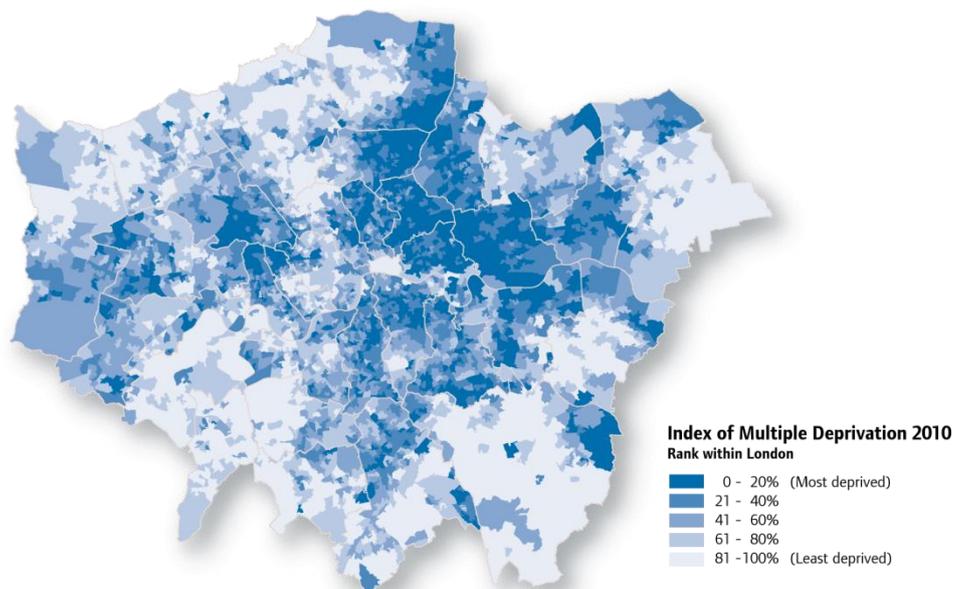
¹⁰³ DWP, Households below Average Income Reports, April 2011

5.7.10 The measure of material deprivation¹⁰⁴ for London pensioners shows that they are at a much higher risk than those elsewhere in the UK. The proportion of pensioners in Inner London suffering from material deprivation was higher than in any other region. It was twice that for Outer London, which was more than four times that of the East of England.

Indices of multiple deprivation

5.7.11 The latest (2010) data shows some minor changes to the indices of multiple deprivation in certain super output areas, but the general concentrations in parts of London remain the same as in the London Plan 2011 and its IIA.

Map 5.13 Indices of Multiple deprivation 2010



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

Housing need

5.7.12 For any given household size, overcrowding is higher in BAME households. This suggests that higher overcrowding rates among ethnic minority households have less to do with family size and more to do with poverty and housing costs¹⁰⁵.

5.7.13 Ethnic minority households are disproportionately likely to become statutorily homeless, reflecting in part greater exposure to risk factors such as poverty, deprivation and overcrowding. In 2010/11, Black or Black British households comprised 34% of those accepted as homeless compared to just 14% of the general population.

¹⁰⁴ Material deprivation for pensioners is a calculated score for people of pensionable age who are unable to afford various items or unable to take part in activities due to health/disability issues or because they have no-one to do it with or to help them. Included in the list are items such as at least one filling meal a day, being able to keep their home warm and in a good state of repair, having hair cut regularly, going out at least once a month and taking a holiday away from home

¹⁰⁵ GLA, Housing in London 2010, October 2010

5.7.14 Many local authorities and housing providers do not monitor sexual orientation of clients and there is therefore not a clear picture of the problems of homelessness amongst lesbians and gay men, nor their needs.

Gypsy and Traveller

5.7.15 The count of Gypsy and Traveller caravans on sites in London appears to fluctuate from year to year, due partly to real changes and partly as a reflection of gaps in the data. Due to high land costs, there are relatively few privately owned caravan sites in London compared to other regions. Around four fifths of caravans are on sites owned by councils or housing associations. The number of authorised pitches in London is estimated to have fallen from 545 in 2000 to 513 in 2010¹⁰⁶.

Homelessness

5.7.16 In London, the number of households accepted as falling within the homelessness duty was 4,230. This is an increase of 26% from 3,350 during the same quarter a year earlier and accounts for 31% of the England total. Conversely, the number of homelessness acceptances in the rest of England decreased by 3% from 9,520 during April to June 2012 to 9,230 during April to June 2013¹⁰⁷.

5.7.17 The main reason for the 'loss of last settled home' in London was the ending of an assured short hold tenancy at 1,450 (34% of acceptances). This is an increase of 78% from 810 (24% of acceptances) in the same quarter last year¹⁰⁸.

5.7.18 The number of households in temporary accommodation in London at 30 June 2013 was 41,250. This is an 11% increase compared to the same date in 2012 (37,190) and accounts for 73% of the total England figure. In contrast, there was only a 4% increase in the number of households in temporary accommodation in the rest of England, from 14,450 to 14,960 in the current quarter¹⁰⁹.

5.7.19 The number of households in B&B accommodation in London as at 30 June 2013 was 2,280, an increase of 9% from 2,100 at 30 June 2012, and accounting for 53% of the total England B&B figure¹¹⁰.

5.7.20 The Localism Act 2011 allows authorities to place homeless households into private rented sector and places a re-application duty on them if a household becomes unintentionally homeless again within two years. Q2 of 2012 was the first quarter for which DCLG collected figures from local authorities on the operation of this new duty. Overall, for all of England, after rounding, 80 re-application decisions were made. Twenty of these were households that were accepted as being unintentionally homeless and in priority need, 20 cases related to households that were eligible but intentionally homeless, 30 cases were eligible but not homeless and 30 cases were ineligible¹¹¹. A fuller picture is expected to emerge over the next few quarters.

¹⁰⁶ CLG, Count of Gypsy and Traveller caravans. Estimate of authorised pitches provided by the London Gypsy and Traveller Unit

¹⁰⁷ Statutory Homelessness: April to June Quarter 2013 England, DCLG 2013

¹⁰⁸ *ibid*

¹⁰⁹ *ibid*

¹¹⁰ *ibid*

¹¹¹ *ibid*

5.7.21 There are a number of issues regarding temporary accommodation which can include its insecurity and affordability, its condition and its location – some households are placed outside their own local authority area. Families in temporary accommodation can also face several moves which can be disruptive. All of these factors can have an impact on physical and mental health.

Rough sleeping

5.7.22 The Mayor set a target in the draft London Housing Strategy 2010 that by the end of 2012 no one will live on the streets of London, and no individual arriving on the streets will sleep out for a second night. He launched the London Delivery Board to help meet this target and action initially focussed on a group of 205 long term entrenched rough sleepers. Over three quarters of this group have left the streets but the remaining group has a range of complex problems including health needs which need individual approaches.

5.7.23 In 2012/13, in London, 6,437 people were seen sleeping rough. This represents a 13% rise when compared to 2011/12. 61% of people were seen sleeping rough just once during the year. This compares to 58% of people seen just once in 2011/12 and 49% in 2010/11¹¹².

5.7.24 In 2012/13 4,353 people were seen rough sleeping for the first time this year. This compares to 3,825 in 2011/12, an increase of 14% (the previous year-on-year increase was 62%)¹¹³. Since April 2011, extended coverage by outreach teams and the introduction of public helplines for reporting rough sleepers, provided as part of the Mayor's No Second Night Out initiative, have meant that new rough sleepers are more likely to be contacted on the first night they spend on the streets. This is part of the reason for an increase in new rough sleepers recorded on CHAIN¹¹⁴, but also why an increasing proportion of new rough sleepers are seen only once.

5.7.25 In London 1,413 people rough sleeping had also been seen sleeping rough in 2011/12. This compares to 1,199 in 2011/12, and represents a rise of 18%. It is important to note that people falling into the stock category may have only been seen sleeping rough a small number of times, but with a significant interval between periods on the street.

5.7.26 Less than one in 10 people (8%) were seen rough sleeping more than 10 times. A small group of people were seen very regularly with 29 people seen more than 50 times in the year (compared to 34 people in 2011/12).

Gender

5.7.27 Twelve per cent of rough sleepers seen were female and 88% male.

Age

5.7.28 The rough sleepers seen in London had the following age profile:

¹¹² Street to Home. CHAIN Annual Report 1st April 2012 - 31st March 2013. Broadway. 2013.

¹¹³ *ibid*

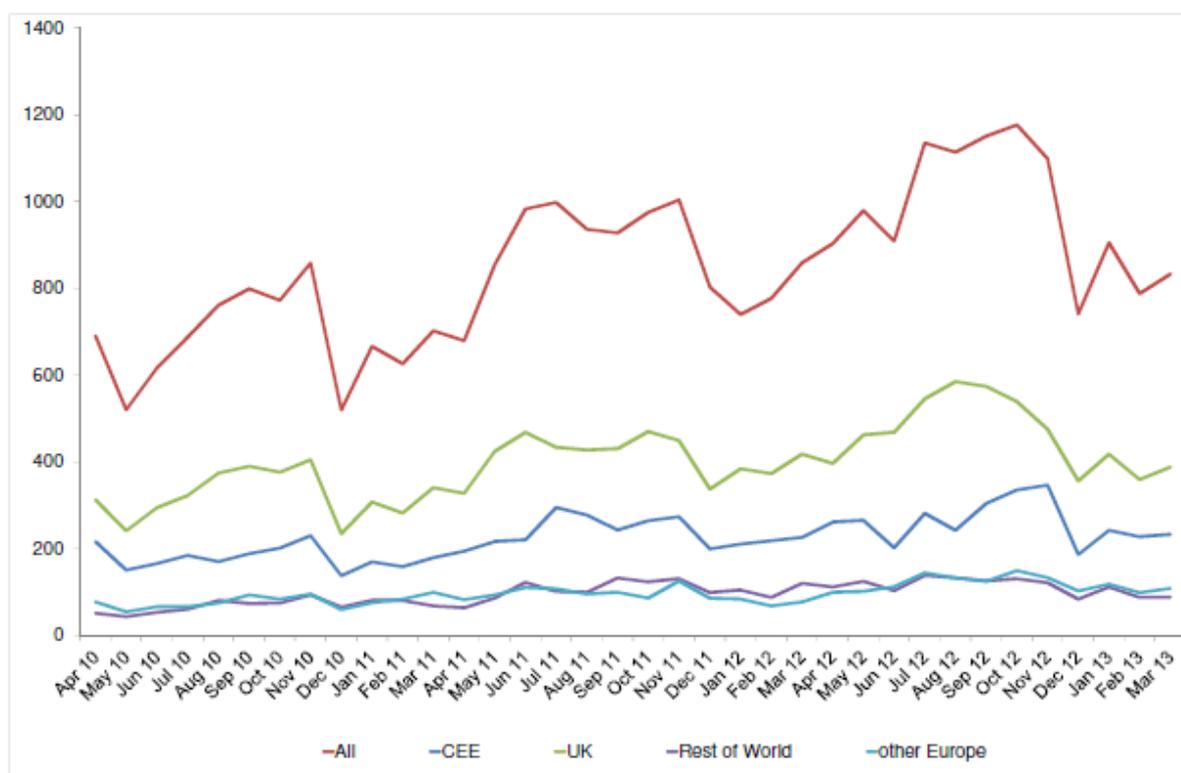
¹¹⁴ Combined Homelessness and Information Network, a database commissioned and funded by the GLA and managed by Broadway Homelessness and Support.

- 58% of people seen sleeping rough in 2012/13 were aged 26-45. This is consistent with the previous three periods.
- 11% of people contacted in 2012/13 were aged 25 years or under, six of whom were aged under 18 years, down from 14 people under 18 years old were seen in 2011/12.
- 9% of people seen rough sleeping in 2012/13 were aged over 55 years, which is also consistent with the previous three years.

Origin of rough sleepers

5.7.29 The graph below shows the origin of rough sleepers since April 2010.

Figure 5.25 Origin of rough sleepers in London



Source: http://www.broadwaylondon.org/CHAIN/Reports/S2h2013/Street-to-Home-report-2012_20132.pdf

- 5.7.30 Prior to being seen rough sleeping, the most common last settled base had been – in private rent accommodation (35%), in the family home (24%), staying with friends (9%), local authority accommodation (5%), hostel (5%) and prison (3%)¹¹⁵.
- 5.7.31 The most common reason for leaving their last settled base was relationship breakdown (18%), eviction (17%), seeking work (15%), asked to leave (5%), left prison (3%), bereavement (2%), seeking work – from outside UK (2%), loss of job (2%)¹¹⁶.
- 5.7.32 The proportion of people seen sleeping rough from the UK who have had experience of the armed forces has remained consistent over the last three years, at 3-4%¹¹⁷.

¹¹⁵ Street to Home. CHAIN Annual Report 1st April 2012 - 31st March 2013. Broadway. 2013

¹¹⁶ *ibid*

London distribution

5.7.33 In 2012/13, the highest number of rough sleepers were contacted in Westminster, where there had been an increase in numbers until 2011/12. In 2012/13 there was a drop of 4%. Westminster was followed by Lambeth which saw a 88% increase overtaking Camden and Southwark for the number of rough sleepers seen¹¹⁸.

Health

5.7.34 Rough sleeping is not only a result of housing costs and availability. Often an integrated approach is needed with the health and social services. Of the people sleeping rough 41% of respondent needed support for problems with alcohol, 28% for drugs problems and 44% had mental health problems. 31% of respondent did not require support for any of these problems¹¹⁹.

5.7.35 A national audit of the health and wellbeing of homeless people carried out by Homeless Link¹²⁰ found that:

- 8 out of 10 homeless clients have one or more physical health need and over half have a long term physical health need
- 7 out of 10 clients have one or more mental health need
- In the past 6 months, 4 in 10 have been to A&E at least once and 3 in 10 had been admitted to hospital
- Almost 1 in 3 regularly eat less than 2 meals per day
- Over half the clients in the audit use one or more types of illegal drugs and around a quarter were engaged in some form of treatment or support

Life expectancy

5.7.36 The life expectancy at birth of Londoners is slightly higher than elsewhere in the country, for men it is 78.3 years-old in London (78.2 in the UK) and for women it is 82.9 (82.3 in the UK).¹²¹ However there is considerable difference between boroughs, and even more between wards. Men in the City of London and Kensington and Chelsea have the highest life expectancy at 83.8 years and 83.2 years, respectively. Men living in Islington have the lowest life expectancy at 75.7 years.

5.7.37 Women in Westminster and Kensington and Chelsea have the highest life expectancy at 88.6 years and 88.2 years respectively. Women living in Lewisham and Newham have the lowest life expectancy with 80.8 and 81.1 years, respectively.

¹¹⁷ *ibid*

¹¹⁸ *ibid*

¹¹⁹ *ibid*

¹²⁰ Homeless Link, The Health and Wellbeing of people who are homeless: evidence from a national audit – interim report, 2010

¹²¹ London data store 2013.

Health and well-being

- 5.7.38 Five per cent of Londoners reported Bad or Very bad health. Gypsy and Irish Travellers had the highest rates of poor health for all age groups with 15% reporting Bad or Very bad health¹²².
- 5.7.39 For residents aged over 50, over 45% Gypsy and Irish Travellers reported Bad or Very bad health. For this age group, the next highest rates of poor health were for Bangladeshis, Arabs and Pakistanis. Less than 2% of residents aged 16 to 34 reported Bad or Very bad health while 17% of those over 64 years old did¹²³.
- 5.7.40 Females had higher rates of poor health than males for all age groups except those aged 0 to 24¹²⁴.

Disability by ethnic group and age

- 5.7.41 Seven per cent of London residents reported that a long term health problem or disability limited their day-to-day activities a lot and over 7% were limited a little. Fifteen per cent of Gypsy and Irish Travellers and 12% of White Irish were limited a lot, while 11% of White Irish and 9% of Gypsy and Irish Travellers were limited a little¹²⁵.
- 5.7.42 Eighteen per cent of London residents who had never worked said their health was Bad or Very bad. Amongst occupational groups, 'routine occupations' had the highest rate of Bad or Very bad health at 11%. For higher managerial and administrative occupations it was 2%¹²⁶.
- 5.7.43 Twenty-five per cent of those that had never worked said their day-to-day activities were limited a lot. The lowest rate amongst occupational groups was 3% for higher managerial and administrative occupations, while the highest rate was for 'routine occupations' at 15%.

Health inequalities

- 5.7.44 In February 2010 the Marmott Review¹²⁷ published an independent review into health inequalities for England. The Review concluded that reducing health inequalities will require action on six policy objectives including giving every child the best start in life, creating fair employment and good work for all and ensuring healthy and sustainable places and communities.
- 5.7.45 The objectives relating to creating and developing healthy and sustainable places and communities include recommendations to develop common policies to reduce the scale and impact of climate change and health inequalities; to improve community assets and reduce social isolation for all. Policy recommendations include:

¹²² 2011 Census Release 3.2b. Key Facts on health for ethnic groups and NS-SeC. GLA Intelligence Unit. 2013.

¹²³ *ibid*

¹²⁴ *ibid*

¹²⁵ *ibid*

¹²⁶ *ibid*

¹²⁷ The Marmot Review, Fair Society, Healthy Lives: strategic review of health inequalities in England post 2010, 2010

- Prioritising policies and interventions that reduce both health inequalities and mitigate climate change for all in society by:
 - improving active travel
 - improving the availability of good quality open and green spaces
 - improving the access to healthy food
 - improving the energy efficiency of housing
- Fully integrating the planning, transport, housing and environmental health systems to address local health issues
- Supporting locally developed and evidenced community regeneration programmes that:
 - remove barriers to community participation and action
 - reduce social isolation

5.7.46 The Marmott Review also set out a range of indicators to assess performance improvement. These include greater accessibility to active modes of travel, such as walking and cycling in all areas, a reduction in local concentrations of fast food outlets and improved food options in local shops, affordability of fuel for those in poverty, increased opportunities for participation and community activity among local residents.

Mental health

5.7.47 Levels of mental wellbeing also vary by deprivation and ethnicity within London. In the city as a whole, 16.3% of people were found to have symptoms of low mental wellbeing. In the least deprived neighbourhood areas of London, this figure was only 12.5% compared to the most deprived areas where 20% of people had a low level of mental wellbeing¹²⁸.

The physical quality of homes and public space

5.7.48 The health impacts of poor quality housing on physical and mental health are well documented. The London Health Inequalities Strategy notes that 'poor quality housing can lead to severe health consequences. Cold, damp, mould and poor maintenance are linked to physical and mental illness including respiratory conditions, anxiety, depression and, in extreme cases, hypothermia'¹²⁹

5.7.49 The English Housing Survey¹³⁰ found that nationally, the proportion of all households living in homes with significant disrepair has reduced substantially from 15% in 2001 to 7% in 2011, indicating an overall improvement in the way dwellings have been maintained by owners and landlords on a day to day basis. Moreover for the oldest households (those where the oldest person was aged 85 or over) the improvement was particularly pronounced, falling from 20% in 2001 to 9% in 2011.

5.7.50 Households living in poverty were more likely (33%) to live in poor housing than households not in poverty (30%). In particular, they were more likely to live in homes with damp problems and significant disrepair than other households.

5.7.51 Some 15% of households that included one or more people with a long term limiting illness or disability felt that their current home was not suitable for their needs.

¹²⁸ London Health Commission, Fair London, Healthy Londoners?, March 2011

¹²⁹ GLA, London Health Inequalities Strategy, April 2010

¹³⁰ DCLG, The English Housing Survey 2012

Households headed by an ethnic minority were also more likely to live in homes with problems related to damp and disrepair, to live in areas with problems in the local environment, and to live in overcrowded conditions¹³¹.

- 5.7.52 Between 2001 and 2011, there was a significant improvement in the energy efficiency of homes generally. This improvement was particularly marked among older households aged 75 or over. In 2001, 16% of such households lived in homes with poor energy efficiency compared with 5% in 2011. However older people were still more likely to live in homes with poor energy efficiency than younger groups¹³².
- 5.7.53 The immediate environment and the quality of green space in and around housing, makes an important contribution to local well being and is in crucial in fostering a sense of neighbourhood and contributing to people's quality of life. The majority of households (88%) surveyed in the national Housing Survey 2012 were generally satisfied with their local area although a higher proportion of owner occupiers (90%) were satisfied than private renters (86%) and social renters (81%). In addition, a smaller proportion of owner occupiers (6%) expressed dissatisfaction with their local area than private renters (8%) and social renters (12%).

Noise

- 5.7.54 Noise can affect health and quality of life. Exposure to noise from road traffic affects around 3.2 million people in the capital, with levels of 55 decibels or more represents 'significant community annoyance'. This is around 42% of the population. Around 29,000 are exposed to levels over 75 decibels. Fewer people in the capital are exposed to noise from railways, with around 453,000 exposed to levels of 55 decibels or more and only 2,000 people exposed to over 75 decibels¹³³.

Air quality

- 5.7.55 London's air quality has improved dramatically since the 1950s when legislation was introduced to tackle the smogs experienced in the capital. Despite this, air pollution is still an issue for Londoners and continues to affect health and everyday quality of life.
- 5.7.56 Poor air quality can cause serious health problems and reduce quality of life and most air quality legislation in Europe and the UK is derived from health evidence provided by the World Health Organisation (WHO).
- 5.7.57 In 2010 the Mayor published a study which estimated that the equivalent of 4,300 deaths per year in London are attributable to long-term exposure to PM_{2.5} (which is widely acknowledged as being the pollutant which has the greatest effect on health)¹³⁴. Its impacts are most severely felt by vulnerable people such as children, older people and those with existing heart and lung conditions. In addition, people living in areas

¹³¹ *ibid*

¹³² *ibid*

¹³³ GLA, Environment Agency, Natural England, Forestry Commission England, London's environment revealed, June 2011

¹³⁴ Institute of Occupational Medicine, Report on estimation of mortality impacts of particulate air pollution in London, 2010.

near major roads – which are often some of the most deprived parts of London – are exposed to particularly high levels of pollution¹³⁵.

- 5.7.58 In June 2012 the World Health Organisation (WHO) confirmed that fumes from diesel engines are carcinogenic. Its research determines that exposure can cause lung cancer and possibly tumours to the bladder.
- 5.7.59 The EU Air Quality Directive of 2008 sets standards for a variety of pollutants that are considered harmful to human health and the environment. These standards include limit values which are legally binding and must not be exceeded. The Directive has been transposed into English law by the Air Quality Standards Regulations 2010 and the Mayor's Air Quality Strategy seeks to meet the requirements of the 2010 regulations and conforms to the assessment criteria set out within them.
- 5.7.60 The London Plan includes a policy seeking developments to be 'air quality neutral' in order to prevent the worsening of air quality from developments. This is supported by wider policies to minimise emissions as well as Supplementary Planning Guidance on how to implement 'air quality neutral' and to minimise dust and emissions during the construction and demolition phase of schemes. The latest version of the London Atmospheric Emissions Inventory estimates that construction and non-road mobile machinery account for around 15% of particulate matter (PM₁₀) and 12% of nitrogen oxide (NO_x) emissions.

Community safety

- 5.7.61 The Annual Londoners Survey 2011 found that 35% of Londoners are worried about crime in their neighbourhood – a decrease from 43% in 2010¹³⁶.
- 5.7.62 The Survey also found that people living in social housing are less likely to feel safe in their neighbourhood (70%) than private tenants (89%) or home owners (79%). Burglary remains the main reason for Londoners feeling unsafe (38%) although people are less worried about this now than they were in 2010 (42%). There is also a relationship between satisfaction with neighbourhood and how safe people feel at night – 81% of those satisfied with their neighbourhood feel safe at night compared with 64% of people who are dissatisfied¹³⁷
- 5.7.63 Research¹³⁸ on behalf of Stonewall found 1 in 8 (13%) of lesbian, gay and bisexual victims have had their homes, vehicle or property damaged. Disabled people were almost twice as likely to be victims of vandalism (19%) compared to 10% of people who do not have a disability.

5.7.64 Potential sustainability issues for consideration in the IIA

- Development and regeneration
- Improving and protecting health and wellbeing
- Equalities
- Delivering appropriate housing
- Responding to climate change

¹³⁵ GLA, Mayor's Air Quality Strategy, 2010

¹³⁶ GLA, Annual London Survey, 2011

¹³⁷ GLA, Annual London Survey, 2011

¹³⁸ Homophobic Hate Crime. The Gay British Survey 2013. Stonewall. 2013

- Increasing transport accessibility
- Promoting safety and security
- Improving air quality

5.7.65 **Potential indicators**

- reducing the gap between life expectancy at birth between areas of regeneration and the rest of London
- reducing the gap between the age standardized death rate from coronary heart disease per 100,000 population in Areas for Regeneration and the average in London
- net increase in the proportion of London residents working in London
- an improvement in the percentage of pupils obtaining 5 or more GCSEs at grades A-C in Areas for Regeneration relative to the LEA as a whole
- decrease in overcrowding in all tenures across London
- improved air quality - level of CO2 emissions, nitrogen dioxide (NO2), particulate matter (PM10s)
- indices of deprivation – skills training

6. ASSESSMENT FRAMEWORK

6.1 Introduction

6.1.1 This section describes the proposed assessment framework for undertaking the IIA. This section also presents the proposed sustainability objectives and guide questions to inform the assessment of the FALP. These sustainability objectives enable consideration to be given to environmental, economic and social factors. The consideration of cumulative effects in the IIA report is also highlighted within the methodology.

6.2 Sustainability Objectives

6.2.1 The establishment of appropriate objectives and guide questions is central to the assessment process and provides a way in which the performance and effect of further alterations can be identified and described. Using objectives ensures that each topic area required by the SEA Directive is addressed and provides a framework which guides the assessment of the FALP, enabling the likely effects of its implementation to be identified.

6.2.3 An objectives-led approach is considered to be most suited to assessing the FALP as it enables assessment of the extent to which the elements of the alterations contribute towards each objective rather than if it will meet prescribed targets. It is therefore more qualitative and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more limited and restrictive at this strategic level. This approach would also ensure consistency with the IIA for the London Plan 2011 and its REMA.

What are Sustainability Objectives?

'Objectives specify a desired direction for change and how they should focus on *outcomes*, not how the outcomes will be achieved (e.g. not specifying targets). They should focus on the ends rather than the means; on the state of the environment rather than the pressures on it. For instance, they should focus on "improving biodiversity" or "improving access", rather than say establishing wildlife areas or protecting rail corridors' (Therivel, R. (2005) *SEA in Action*).

6.2.4 The proposed sustainability objectives described in this section have been informed by the examination of baseline information, the identification of the key sustainability issues for London and the review of plans and programmes. They are based on the objectives used for the IIA of the current London Plan.

6.2.5 Broadly, the objectives present the preferred social, economic or environmental outcome, which usually involves the minimising of detrimental effects and the enhancement of positive effects where relevant. They were developed to allow for a comprehensive appraisal of the likely effects of the implementation of the London Plan 2011 by covering the relevant social, economic and environmental aspects. They were updated for REMA and have been reviewed again to reflect changes in legislation and in any social, economic or environmental policy.

6.2.6 The guide questions have been developed to provide full coverage of the aspects that should be considered with regards to the likely effects arising from the implementation of the FALP. They are not designed to be read as targets or aims with which to achieve the objective. These have also been reviewed to reflect changes in legislation and in any social, economic or environmental policy.

6.2.7 Statutory Compliance that underpins the proposed objectives and as such this has not been reflected individually in the objectives or guide questions. The objectives and guide questions listed in Table 6.1 have been reviewed following the consultation period and updated.

Table 6.1 Key Sustainability Objectives for the IIA

Key Sustainability Objectives	Guide Questions	SEA Topic Requirement
<p>1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.</p> <p><i>Relates to Issue*:</i> A</p>	<ul style="list-style-type: none"> • Will the regeneration have benefits for deprived areas? • Will it help to make people feel positive about the area they live in? • Will it help to create a sense of place and ‘vibrancy’? • Will it help reduce the number of vacant and derelict buildings? • Will it make the best use of scarce land resources and reuse brownfield sites? • Will it minimise impacts of development on the environment? • Will it help address contamination, including of land? 	<p>Material Assets, population</p>
<p>2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.</p> <p><i>Relates to Issue*:</i> B</p>	<ul style="list-style-type: none"> • Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)? • Will it improve the quality and extent of designated and non-designated sites? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Will it protect and enhance the region’s waterbodies to achieve a good ecological status? • Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment? • Will it bring nature closer to people, especially in the most urbanised parts of the city? • Will it promote respect and responsibility for the wise management of biodiversity? • Will it improve access to areas of biodiversity interest? • Will it enhance the ecological function and carrying capacity of the green space network? • Will it promote a network of green infrastructure? 	<p>Biodiversity, Fauna, Flora, Soil, Water, Landscape</p>
<p>3. Health and Well-being. To maximise the health and wellbeing of the population and reduce</p>	<ul style="list-style-type: none"> • Will it help reduce poverty and the impact of income inequality? • Will it help reduce health inequalities? • Will it help improve mental and emotional health? • Will it improve access to high quality public services 	<p>Population, Health</p>

<p>inequalities in health.</p> <p>Relates to Issue*: D</p>	<p>(including health facilities)?</p> <ul style="list-style-type: none"> • Will it help reduce the misuse of substances? • Will it help people to live an inclusive and active lifestyle? • Will it promote a sense of well-being? 	
<p>4. Equalities. To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.</p> <p>Relates to Issue*: E</p>	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas and communities most affected? • Will it remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination? • Will it promote a culture of equality, fairness and respect for people and the environment? • Will it, in particular address the housing, cultural, social and employment needs of those with protected characteristics? • Will it reduce the level of crime experienced by those with protected characteristics? • Will it promote adequate accessibility, in particular for older or disabled people? 	<p>Population, Health</p>
<p>5. Housing. To ensure that all Londoners have access to good quality, well-located, housing that is affordable.</p> <p>Relates to Issue*: C, F</p>	<ul style="list-style-type: none"> • Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate social, physical and environmental infrastructure are in place for new residents? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it increase use of sustainable design and construction principles? • Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? • Will it ensure homes are well located in relation to flood risk? • Will it promote the increased supply of housing? 	<p>Population, Health, Material Assets</p>

<p>6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p> <p><i>Relates to Issue*: C, G</i></p>	<ul style="list-style-type: none"> • Will it help generate satisfying and rewarding new jobs? • Will it help to provide appropriate employment in the most deprived areas and stimulate regeneration? • Will it help reduce overall unemployment, particularly long-term unemployment? • Will it help to improve learning and the attainment of skills? • Will it encourage the development of healthy workplaces? • Will it provide employment in accessible locations? 	<p>Population, Material Assets</p>
<p>7. Stable Economy. To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use.</p> <p><i>Relates to Issue*: H, G</i></p>	<ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it help to diversify the economy? • Will it support and prevent the loss of local businesses? • Will it encourage business start-ups and support the growth of businesses? • Will it encourage ethical and responsible investment? • Will it help reduce levels of deprivation? • Will it support the development of green industries and a low carbon economy? • Will it support other niche or emerging sectors of the economy? • Will it help maintain London as an internationally competitive city? • Will it support the infrastructure required by a growing and changing economy? 	<p>Population, Material Assets</p>
<p>8. Flood risk and Climate Change Adaptation. To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.</p> <p><i>Relates to Issue*: I, J</i></p>	<ul style="list-style-type: none"> • Will it protect London from climate change impacts? • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it manage existing flood risks appropriately, including taking opportunities to reduce existing flood risk and avoid new flood risks? • Will it minimise and manage the effects of surface water flooding? • Will it help London function during periods of drought? • Will it help avoid overheating in the built environment? • Will it support social and physical infrastructure to be resilient to climate change impacts? • Will it minimise the health impacts due to the impacts of climate change? • Will it contribute to ensuring an adequate water supply to London, including by using existing water resources efficiently? 	<p>Climatic Factors, Water, Biodiversity</p>
<p>9. Climate Change Mitigation and Energy. To ensure London contributes to global climate change</p>	<ul style="list-style-type: none"> • Will it help minimise emissions of greenhouse gases? • Will it help London meet its emission targets, including through off-setting existing emissions? • Will it avoid exacerbating the impacts of climate change? • Will it increase the proportion of energy both purchased 	<p>Climatic Factors, Material Assets</p>

<p>mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.</p> <p><i>Relates to Issue*: I</i></p>	<p>and generated from renewable and low carbon sustainable resources?</p> <ul style="list-style-type: none"> • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency? • Will it support low and renewable infrastructure? • Will it support community energy projects? 	
<p>10. Water Quality & Water Resources. To protect and enhance London’s waterbodies and the Blue Ribbon Network.</p> <p><i>Relates to Issue*: J</i></p>	<ul style="list-style-type: none"> • Will it improve the quality of water bodies? • Will it reduce discharges to surface and ground waters? • Will it promote sustainable urban drainage? • Will it improve the water systems infrastructure (e.g. water supply/sewerage)? • Will it reduce abstraction from surface and ground water sources? • Will it reduce water consumption? • Will it help to meet the objectives of the Water Framework Directive? 	Water
<p>11. Waste. To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.</p> <p><i>Relates to Issue*: K</i></p>	<ul style="list-style-type: none"> • Will it help minimise the production of waste? • Will it help minimise resource use? • Will it promote reuse and recycling (e.g. in the design of buildings and spaces, etc)? • Will it enable the sorting and handling of waste and recyclable products? • Will it help to promote a market for recycled products? • Will it promote resource recovery from waste? 	Population, Material Assets
<p>12. Accessibility and Mobility. To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).</p> <p><i>Relates to Issue*: L</i></p>	<ul style="list-style-type: none"> • Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will it help to provide a more integrated transport service from start to finish (i.e. place of residence to point of service use or place of employment)? • Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce road traffic accidents, especially involving cyclists? • Will it improve physical access to the transport system as well as buildings and spaces. 	Population, Health, Air, Climatic factors

<p>13. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.</p> <p><i>Relates to Issue*: M</i></p>	<ul style="list-style-type: none"> • Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential, including their settings? • Will it conserve and enhance the townscape/cityscape character? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it support and enhance heritage? • Will it improve the wider built environment and sense of place? • Will it conserve and enhance local character? • Will it protect important views across London? • Will it protect and enhance public spaces including historic parks and gardens? 	<p>Cultural Heritage (including architectural and archaeological heritage), Landscape</p>
<p>14. Liveability and Place. To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p> <p><i>Relates to Issue*: H, N</i></p>	<ul style="list-style-type: none"> • Will it create and sustain vibrant and diverse neighbourhoods and communities and encourage increased engagement in recreational, leisure and cultural activities? • Will it increase the provision of culture, leisure and recreational activities? • Will it support the provision of quality, affordable and healthy food? • Will it provide opportunities for people to choose an active and fulfilling life? • Will it increase the provision of key services, facilities and employment opportunities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it protect and enhance the provision of open space? • Will it help reduce actual levels of crime and antisocial behaviour? • Will it help reduce damage to the physical and natural environment? • Will it help reduce the perception of crime in an area? • Will it help reduce actual noise levels and disturbances from noise and other nuisance? • Will it protect and improve existing quality of life? • Will it help reduce the risk of terrorist attack? 	<p>Population, Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
<p>15. Open Space. To protect and enhance natural open space in London.</p> <p><i>Relates to Issue*: O</i></p>	<ul style="list-style-type: none"> • Will it protect and enhance areas of open space? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? • Will it address areas with deficiencies of access to open space? • Will it promote an appropriate range and type of open space uses? • Will it increase Londoners access for recreational purposes? 	<p>Biodiversity, Flora, Fauna, Landscape, Health</p>

	<ul style="list-style-type: none"> • Will it promote urban greening? • Will it promote and support the function of the Blue Ribbon Network? 	
<p>16. Air Quality. To improve London's air quality.</p> <p><i>Relates to Issue*:</i> <i>P</i></p>	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce exposure to poor air quality? • Will it reduce emissions of greenhouse gases? • Will it help to reduce emissions of PM10 and NO2? • Will it reduce emissions of ozone depleting substances? • Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2010?) 	Air, Health

* These objectives relate to a number of sustainability issues (presented in Section 5.1), however, only the principle issues are listed.

6.2.8 The sustainability objectives are based upon previous SA/IAs of the London Plan and have been updated to reflect the experience of past assessments and the set of sustainability issues identified in Sections 5.2 to 5.7. They also reflect the Mayor's new duties under the Equality Act 2010 as well as wider London Plan policies and the Mayor's wider strategies.

6.3 Options and Alternatives

6.3.1 Sustainability Appraisal guidance sets out that options and alternatives to the proposed policy approaches need to be identified during the development of the proposed policies, including alterations. The initial proposed alterations (preferred options) to the London Plan 2011 are set out in Appendix 1. These are initial considerations that reflect the changing baseline information, trends and changes to national policy. These initial proposed alterations will evolve during the development of FALP and will be informed by the full IIA. An initial consideration of the proposed changes has been made to determine whether it is considered the proposed change will have a substantive effect on the overall objective of the policy. For example, factual updates that do not change the overall objective of the existing London Plan 2011 policy have been scoped out as not requiring to be appraised.

6.3.2 In line with SEA/SA guidance alternatives to the preferred options have also been developed. These are based on previous experience and the wider policy context. The alternative options outlined in Appendix 2 are based on initial proposed policies which will be subject to appraisal and review during the development of FALP and will be refined by the independent consultants and appraised in the full IIA report.

6.4 Methodology

6.4.1 The IIA report will contain the necessary information to make it statutory compliant with the relevant legislation including:

- the European Directive 2001/42/EC, the GLA Act 1999 (as amended) in relation to sustainability (economic and social) and environmental assessments
- the Equality Act 2010 and GLA Act 1999 (as amended) in relation to equalities duties
- the GLA Act 1999 (as amended) in relation to the duty to reduce health inequalities

- Crime and Disorder Act 1998 (s17) and the Police and Justice Act 2006 in the relation to community safety

6.4.2 It will consist of sections that provide information describing the context of the assessment, including:

- an overview of the proposed FALP,
- an overview of any alternative options considered,
- consideration of the Sustainability Appraisal
- a summary of the methodology for undertaking the assessment,
- the assessment itself, and
- the conclusions and recommendations arising from the assessment process.

6.4.2a The appraisal process will inform the development of the proposed policies and alterations. It will highlight whether there are considered to be any positive or negative effects resulting from the proposed policy changes, including significant effects. This process will subsequently inform whether any mitigation measures are required to address any potential negative effects of the proposed policy changes.

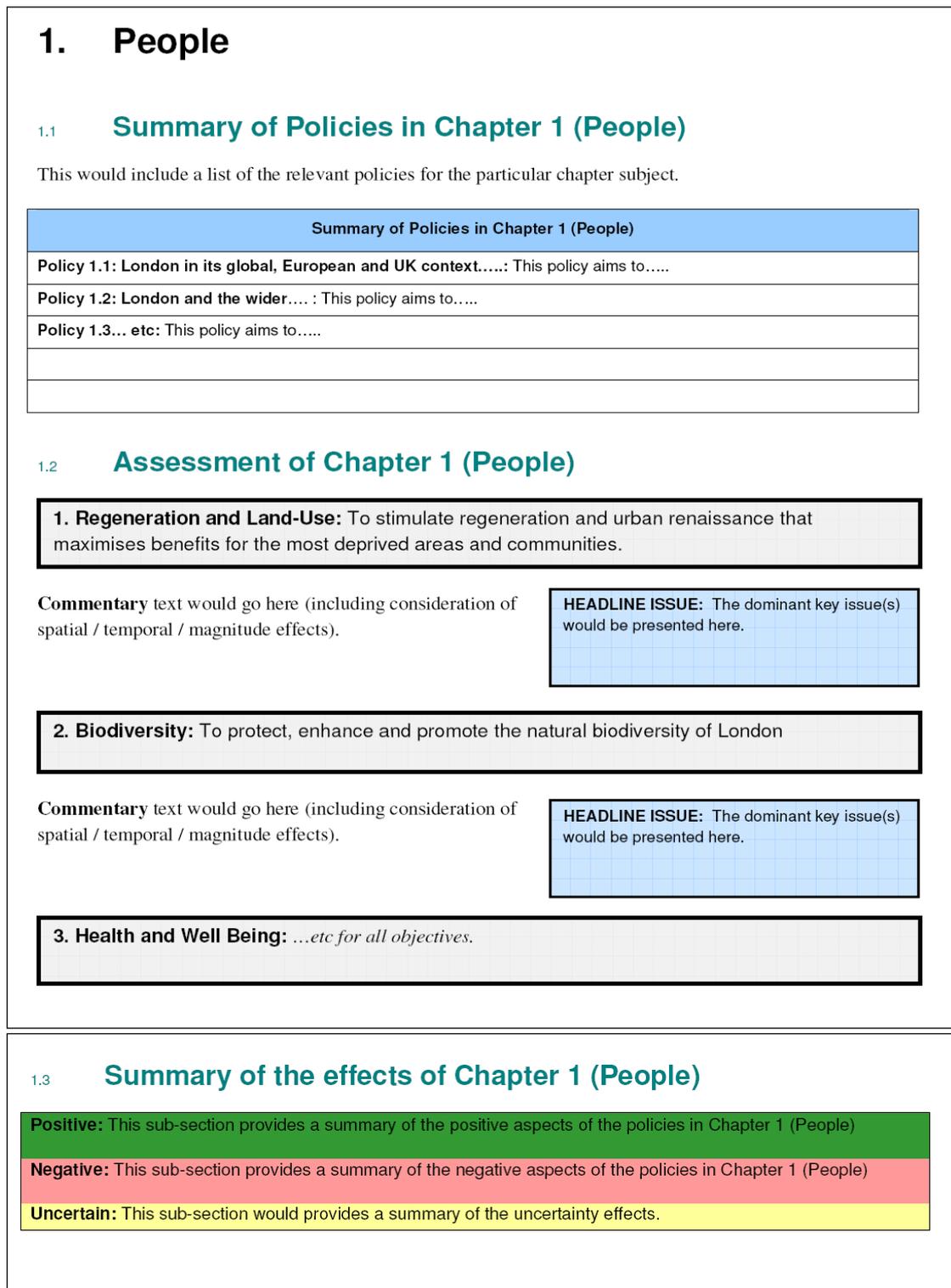
Cumulative effects and effects outside of London

6.4.3 The consideration of cumulative effects in the IIA report is also highlighted within the methodology. Cumulative effects may occur as a result of multiple policy alterations or in combination with the effects of other plans and programmes. Where a number of policies are focussed on one area, such as town centres, inner/outer London or Opportunity Areas, there may be effects on that area from all the policy alterations together. Cumulative effects may also arise from the consideration of the implementation of other plans and programmes. The Full IIA report will set out the effects of each of the policy groups against the IIA objectives. Planning policy for London may have effects beyond London. Any potential effects of the proposed alterations beyond London's boundaries will also be considered.

6.4.4 The proposed approach reflects the requirements of SEA/SA, feedback from consultees to date and experience gained from previous SEA/SAs. It recognises that many policies are inter-related and do not act in isolation and therefore sustainability effects are also inter-related. The proposed approach is consequently based upon presenting the assessment under the topic areas of the FALP, rather than as scores for each policy against each objective.

6.4.5 Figure 6.2 below illustrates how the assessment will be presented in the IIA report. The assessment will include a short summary of the policies presented under each topic area (as identified in the example for 'People' below).

Figure 6.2 An example of the proposed assessment headings and layout



6.4.6 This will be followed by a second sub-heading entitled *Assessment of (the relevant chapter heading)*. This sub-heading will be divided into the individual sustainability objectives. Under each objective there will be a commentary describing the effect that the Chapters’ policies will have towards achieving the objective.

6.4.7 The commentary will cover the following issues:

- **Spatial** – consideration will be given to the geographic occurrence of the effect. Generally this will be London wide, but specific areas (e.g. Central Activity Zone, Inner London, Outer London) will be referenced where appropriate;
- **Timescales** – consideration will be given to when the effect may occur. 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. 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 plan’s horizon (post-2031); and
- **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 (major/minor /negligible). In some cases a policy may have no bearing on the achievement of the objective as they are unrelated. In such circumstances this will be highlighted.

6.4.8 The commentary will be used to identify the generic effects of the policies where they are similar. Where significant differences in the effect of individual policies occur, they will be captured and highlighted in the assessment. In such a way, duplication of information is avoided (if compared to using a matrix to examine each policy separately) and the assessment will remain focussed on the key issues.

6.4.9 A headline issue box has been included to provide an ‘at-a-glance’ indication of the key issue(s) identified against each objective. Rather than using a scoring methodology, which can be too simplistic, the headline issue box would contain a very short summary highlighting the dominant trend(s) of the assessment for the individual objective. For example, it would include the policies where there were significant effects on an objective.

6.4.10 Finally, following the assessment for each of the objectives, a short summary section will be included. This would provide a summary of the objectives against which there was a broadly positive effect from the policies, those against which there was largely a negative effect and those where there was a substantial level of uncertainty. This summary section would therefore provide an indication of the cumulative assessment of all the policies relevant to that chapter.

Appendix 1 – Initial proposed alterations to be appraised¹³⁹

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Chapter 1 – Context and Strategy			
Policy 1.1- Delivering the Strategic Vision and Objectives for London	Policy change to roll forward Plan to 2036.	Where available, projections will be extended to 2036. This enables the Plan to consider the potential demand for various land uses and how much land they require and broad options and locations for delivery.	Yes Extends period of all policies. Assess with policy 4.5 – London’s Visitor Infrastructure.
Chapter 2 – London’s Places			
Policy 2.1 – London in its global, European and United Kingdom Content	Updates to supporting text noting plan will roll forward to 2036.	Reflects wider approach set out in Policy 1.1.	No Policy 1.1 sets overall strategy. Appraise Policies 1.1 and 4.5.
	Update to supporting text noting the Mayor’s 2020 Vision.	General factual update. No effect on policy direction.	No
Policy 2.2 – London and the wider metropolitan area	Policy change to add reference to sub-regional ‘partnerships’ and delete reference to Inter-Regional Forum and any successor body. General updates, including of statistics to supporting text.	Factual update and clarification. No effect on policy direction.	No Factual update and clarification. Reflects the changes in governance structures and that Inter Regional Forum or a successor body no longer exists.
Policy 2.4 - The 2012 Games and their legacy	Policy change to include the agreed purpose of the LLDC.	Factual update. No effect on policy direction.	No Factual updates. Reflects the changes in governance and agreed purpose of the LLDC and that a Local Plan is being produced.
	Policy and supporting text note the LLDC is preparing a Local Plan.	Factual update. No effect on policy direction.	
	Policy and supporting text update the name of the Queen Elizabeth Olympic Park.	Factual update. No effect on policy direction.	No Factual updates on name of park.
	Outlines additional matters the Local Plan should plan for to reflect the significance of Stratford. Outlines requirements for the matters that should be considered when the LLDC and boroughs are preparing Plans and making planning decisions.	Places more emphasis on the significance of Stratford, in line with wider town centre policies. Gives the criteria more weight by including them in policy.	Yes Assess with wider town centre changes Policies 2.15 and 4.7. Yes

¹³⁹ Policies and assessment subject to change as policies develop and as advised by independent consultants carrying out the Full IIA Report.

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Policy 2.5 – Sub-regions	Updates to supporting text to reflect changing statistics and an extended plan period.	Reflects wider approach set out in Policy 1.1. No effect on policy direction.	No Policy 1.1 sets overall strategy. Appraise Policies 1.1 and 4.5.
Policy 2.6 – outer London: Vision and strategy	Additional supporting text highlighting a positive contribution of outer London.	Provides some emphasis, but no change in effect of policy.	No
Policy 2.7 – Outer London: Economy	Policy alteration to note new ways of shopping – internet and multi-channel and need to consider their impacts on town centres.	This will ensure that this type of shopping is considered when considering the retail demand in Outer London and enable any surplus to meet other priorities, including higher density housing.	Yes Assess Policies 2.4, 2.15, 4.7 and 4.8.
	Policy and supporting text alterations to support consolidation and mixed used development and add policy emphasis to support the provision of higher density housing in town centres.	Encourages consolidation and mixed use development including the provision of housing, reflecting the need/priority for housing. Reflects the changing nature of retail and town centres.	Yes Assess with Policies 2.13, 2.15, 3.3, 3.7 and 3.18.
	Policy alteration to provide more detail on the potential types of affordable workspaces.	Provides examples only. No effect on policy direction.	No Provides examples only.
Policy 2.8 – Outer London: Transport	Policy alteration to note guidance on car parking. Supporting text and Table 6.2 seek a more flexible approach.	Whilst policy change does not suggest a specific impact, the supporting text seeks a more flexible approach to car parking which may have some sustainability implications.	Yes Assess in conjunction with policy 6.13 – Parking and table 6.2.
Policy 2.9 – Inner London	Policy change to ensure appropriate workspace for areas of changing economy.	This will support the provision of workspace that reflects the changing ways of working and the changes in the economy.	Yes Assess in conjunction with Policies 4.3 and 4.10.
	Factual updates to supporting text.		
Policy 2.10 – Central Activities Zone – Strategic Priorities	No policy change, but diagram to be altered in line with policy objectives.	Change to diagram reflects demand for various types of office development and the changes at King’s Cross / St Pancras. No effect on policy direction.	No
Policy 2.11 – Central activities zone – Strategic function	New policy encouraging boroughs to proactively plan for the CAZ.	Additional support for planning in the CAZ.	Yes Assess in conjunction with policies 4.3 and 8.1.
	Additional supporting text to support various workspaces.	Supports various types of employment space. No new policy direction due to Policy 2.9 and 4.10.	No
Policy 2.13 – Opportunity Areas and Intensification	No policy change, but diagram to be altered in line with policy objectives, including additional	The changes are updates and clarifications to reflect growth projections.	Yes Assess with Policies 2.7, 2.15, 3.3, 3.7 and 3.18.

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Areas	Opportunity Area and name changes. Supporting text updated to reflect the development projections.	Whilst there is no effect on policy direction, the supporting information is a major contributor to meeting London's housing and employment floorspace demand.	
Policy 2.14 – Areas for regeneration	Additional supporting text to explain the Mayor's regeneration programme.	General information. No effect on policy direction	No Factual change
Policy 2.15 – Town centres	Policy alteration to note reduction in the rate of growth of comparison goods retail expenditure and new ways of shopping – internet and multi-channel and need to consider their impacts on town centres as well as surplus uses. Policy change to ensure land uses in town centres are actively managed to ensure the efficient use of land/premises, including scope to redevelop surplus retail/offices for higher density housing/mixed use development. Changes to map to reflect status and function of town centres following Town Centre Health Checks.	This will ensure that this type of shopping is considered when considering the retail demand in Outer London and ensure the efficient use of land/space in town centres to enable any surplus to meet other priorities, including higher density housing. Provides greater support for housing in town centres and higher densities.	Yes Assess with policies 2.4, 2.7, 4.7 and 4.8. Yes Assess in conjunction with Policies 2.7, 2.13, 3.3, 3.7 and 3.18. Yes Assess with policies 2.4 & 4.7.
Policy 2.16 – Strategic outer London development centres	Change to Table 2.1 – Potential strategic outer London development centres	Notes potential of development centres, has no effect on policy direction.	No
Policy 2.17 – Strategic industrial locations	Additional supporting text providing clarification.	Provides clarification to support policy, but no change in policy direction.	No
Policy 2.18 – Green Infrastructure: The Network of Open and Green Spaces	Policy change note that in deficiency areas, green infrastructure should be provided to help 'address' this deficiency, instead of 'meet'. Policy change to reflect the guidance on green infrastructure in the NPPF. Inclusion of explanation of green infrastructure in supporting text.	Changes the objective from meeting deficiency to alleviating it. Provides policy backing for national policy. General update. No effect on policy direction.	Yes Assess with Policies 3.18, 4.8, 7.13, 7.18, 7.23 and 8.2. Yes Assess with Policies 3.18, 4.8, 7.13, 7.18, 7.23 and 8.2. No
Key Diagram	No policy change, but diagram to be altered in line	Changes generally reflected on other maps.	No

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Policy 3.10 – Definition of affordable housing	Updates to supporting text to reflect revised income bands for intermediate housing	Factual update based on funding regime. No effect on policy direction	No
	Update to supporting text to time limit locally set criteria for intermediate housing.	New approach aimed at ensuring the take up of intermediate housing.	Yes Assess in conjunction with Policies 3.3, 3.8 and 3.11.
Policy 3.11 – Affordable housing	Policy and supporting text updates affordable housing target.	No change in policy direction but provides further support for the delivery of affordable housing.	Yes Assess in conjunction with Policies 3.3, 3.8 and 3.10.
Policy 3.12 – Negotiating affordable housing	Additional supporting text to support development appraisals.	Supports Part B of the policy. No change in policy direction.	No
Policy 3.14 – Existing housing	Updates to supporting text to reflect latest statistics on delivery.	Factual statistical updates. No change in policy direction.	No
Policy 3.15 – Coordination of housing development and investment	New supporting text to note the role of planning in the delivery of development.	Explanatory text. No change in policy direction.	No
Policy 3.16 – Social infrastructure	Clarification change to policy.	Provides additional guidance, but no effect on policy direction	No
	Change to supporting text to provide additional guidance and clarification to support parts B and D of this policy.		
Policy 3.17 – health and social care facilities	Policy and supporting text updates to note new role of public health in boroughs and links with planning.	Alterations reflect NHS changes and encourage joint working. No effect on policy direction.	No Factual alterations.
Policy 3.18 – Education facilities	Changes in terminology in the policy and support for new school provision.	No effect on policy direction.	No Factual alterations reflect changes in terminology.
	Extend policy and supporting text to cover secondary schools.	Policy change to address oversight in policy to address all school demand. However also reflects changing demographics and need to address demand for school places.	Yes Assess with Policy 2.18, 4.8, 7.13, 7.18, 7.23 and 8.2.
	New policy to support colocation of schools and housing.	New policy approach to support the colocation of schools and housing.	Yes Assess with policies 2.7, 2.13, 2.15, 3.3 and 3.7.
Policy 3.19 – Sports facilities	Changes in terminology in the policy and supporting text.	Factual update.	No
	Explanation in the supporting text to support appropriate sports provision and the need for playing fields in line with Sport England methodology.	Provides additional explanation to note the importance of assessing need of playing fields. No change in policy direction.	No

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
	Factual changes to supporting text noting outcomes of Mayor's Sports Legacy programme.	General factual change. No change in policy approach.	No
Chapter 4 - London's Economy			
Policy 4.1 – Developing London's economy¹⁴⁰	Policy and supporting text change to ensure the benefits from sustainable growth and development through infrastructure provision are maximised and general factual updates.	Policy backing and detail on the benefits that can / should be delivered through improvements in infrastructure.	Yes
Policy 4.2 – Offices	Policy alteration and additional supporting text to note that the Mayor will monitor the change of use from office to residential under permitted development rights and encourages the boroughs and stakeholders to do the same.	Factual. No effect on policy direction.	No
Policy 4.3 – Mixed use development and offices	New policy to support small scale offices in the CAZ New policy to support office development in general in the CAZ.	Provides further policy support for boroughs to support new and existing office development in the CAZ.	Yes Assess with policies 2.9 and 4.10 Yes Assess with policies 2.11 and 8.1.
Policy 4.4 – Managing industrial land and premises.	Factual updates in supporting text based on Land for Industry SPG. Roll dates forward to 2036 Additional supporting text to provide clarification regarding release of surplus industrial land.	Factual updates. No effect on policy direction Reflects wider approach set out in Policy 1.1. Provides general guidance and clarification to support part Ab of policy. No effect on policy direction	No No Appraise through policies 1.1 and 4.5. No
Policy 4.5 – London's Visitor Infrastructure	Roll forward Plan to 2036	Projection of demand for hotel bedrooms is extended to 2036. This enables the Plan to consider the potential demand for various land uses and how much land they require and broad options and locations for delivery.	Yes Extends period of all policies. Assess with policy 1.1 – Delivering the strategic vision and objectives for London.
Policy 4.7 – Retail and Town centre development	Policy and supporting text changes, noting the potential future levels of retail provision and potential requirements for consolidation.	Policy change to support Policy 2.15.	Yes Assess with Policies 2.4, 2.7, 2.15 and 4.8.
Policy 4.8 –	Policy change to clarify that	Clarification. No effect on	No

¹⁴⁰ Note policy already amended through process to reflect wider benefits of sustainable growth and development as opposed to purely economic benefits

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Supporting a successful and diverse retail sector	retailing includes related facilities and services. Policy change to include local community assets. Policy change to include additional measures for a proactive approach to retail planning.	policy direction. Policy backing to an additional facility as part of a local retail offer. Provides policy backing for the additional considerations	Although links in with Policy 2.15 – Retail. Yes Assess with Policies 2.18, 3.18, 7.13, 7.18, 7.23 and 8.2. Yes Assess with Policies 2.4, 2.7, 2.15 and 4.7.
Policy 4.10 – New and emerging sectors	Policy and supporting text changes to support new technology, media, telecommunications and life sciences/medical sectors in London.	Provides policy backing to support new/emerging economic sectors in London.	Yes Assess in conjunction with Policies 2.9 and 4.3.
Policy 4.11 – Encouraging a connected economy	Policy change to update the type of broadband and forms of communications.	Factual update. No effect on policy direction.	No Factual update and clarification.
Policy 4.12 – Improving opportunities for all	Additional supporting text to quote the Mayor’s 2020 Vision.	General information. No effect on policy direction.	No
Chapter 5 – London’s Response to Climate Change			
Policy 5.2 – Minimising carbon dioxide emissions	Additional supporting text to provide additional information.	General information. No effect on policy direction.	No
Policy 5.4A – Electricity and Gas supply	New policy and supporting text to promote the strategic provision of electricity and gas infrastructure to accommodate anticipated growth.	Provides policy backing for the Mayor’s priority to ensure London has sufficient electricity and gas infrastructure and supply in a timely fashion.	Yes Assess in conjunction with Policy 8.1.
Policy 5.5 – Decentralised energy networks	Updated supporting text to reflect latest information on the future provision of decentralised energy.	General factual update. No effect on policy direction.	No Factual changes
Policy 5.12 – Flood risk management	Updated supporting text to reflect the publication of TE2100	General factual update. No effect on policy direction.	No Factual changes
Policy 5.13 – Sustainable drainage	Updated supporting text to reflect updates from Drain London project and the revised RFRA.	General factual update. No effect on policy direction.	No Factual updates
Policy 5.14 – Water quality and wastewater infrastructure	Additional supporting text to note statements in the National Policy Statement on Waste Water.	General factual update. No effect on policy direction.	No Factual updates
Policy 5.15 – Water use and supplies	Updates to supporting text to note water consumption rates and activities by the Mayor and Thames Water.	General factual update. No effect on policy direction.	No Factual updates
Policy 5.16 Waste self-sufficiency	Policy change to bring forward date for London to be self-sufficient in waste	Provides policy backing to bring date forward which will have an effect on waste	Yes

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
	and factual statistical changes to supporting text.	processing.	
Policy 5.17 – Waste capacity	Policy change setting carbon performance criteria. Change to waste projections.	Policy backing for performance criteria to ensure carbon efficiency.	Yes
Policy 5.19 – Hazardous Waste	General updates to policy and supporting text and clarification.	No effect on policy direction.	No Factual updates and clarification
Policy 5.20 - Aggregates	Additional supporting to text to highlight NPPF and provide clarification.	General clarification. No effect on policy direction.	No Factual updates and clarification
Chapter 6 - London's Transport			
Policy 6.1 – Strategic Approach	No change to policy, but update to table in supporting text reflects changes in strategic transport priorities and funding.	Changes in order of projects reflect wider policy objectives. No effect on policy direction.	No
Policy 6.4	Update policy to move Crossrail 2 to a separate point and update supporting text. Update supporting text on other transport projects.	General factual updates. No effect on policy direction.	No General factual updates
Policy 6.6 – Aviation	Additional supporting text to highlight the Government's Davies Commission and the Mayor's submission to it.	Factual updates. No effect on policy direction.	No Factual updates
Policy 6.7 – Better streets and surface transport	Additional supporting text to cross-reference to policy 8.2.	No effect on policy direction.	No
Policy 6.9 Cycling	Update policy and supporting text to reflect the current delivery programme for cycle infrastructure. New and amended policies to include a proactive approach to supporting cycling infrastructure through both planning decisions and LDF preparation.	Policy backing for the Mayor's strategic approach to cycling infrastructure and wider updates and clarification. Update cycle parking standards which potentially have sustainability effects.	Yes Yes
Policy 6.10 Walking	Policy update to reflect the formal name of the strategic walking routes and to reinforce the pedestrian environment.	No effect on policy direction.	No
Policy 6.11 – Smoothing traffic flow and tackling congestion	Policy and supporting text updates to note latest reports and projects.	General clarification. No effect on policy direction.	No General clarification
Policy 6.12 – Road network capacity	Update supporting text to note latest report.	No effect on policy direction.	No
Policy 6.13 Parking	Updated car parking standards (Table 6.2) and additional supporting text.	No policy change, but the changes to the car parking standards may have some	Yes Assess in conjunction with

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
		sustainability implications.	Policy 2.8 Outer London Economy.
Policy 6.14 Freight	Policy update in terminology and to note example provided by the Olympics.	Factual change and example. No effect on policy direction.	No
Chapter 7 - London's Living Places and Spaces			
Policy 7.1 Lifetime neighbourhoods	Policy change to clarify new concept and introduce the principles of lifetime neighbourhoods. General clarification in policy and inclusion of three principles throughout the policy.	Policy backing for new lifetime homes concept as well as other design considerations.	Yes Assess in conjunction with Policy 7.3 and 7.5.
Policy 7.3 Designing out crime	General policy changes to providing more detail and clarification.	Policy backing for additional policy detail.	Yes Assess in conjunction with Policy 7.1 and 7.5.
Policy 7.5 Public realm	Policy change to address management. Additional supporting text to support green infrastructure and note importance for high density development.	Policy backing to ensure management of the public realm.	Yes Assess in conjunction with Policy 7.1 and 7.3.
Policy 7.10 World Heritage Sites	Policy update to reflect SPG on World Heritage Sites has been published. Additional supporting text to encourage the implementation of the SPG	Factual update . No effect on policy direction.	No Factual update
Policy 7.13 Safety, Security and Resilience to Emergency	Policy change to support collaborative working and identify needs for community safety.	Policy backing to support provision of necessary infrastructure	Yes Assess in conjunction with Policies 2.18, 3.18, 4.8, 7.18, 7.23 and 8.2.
Policy 7.15 Reducing noise and enhancing townscapes	Revised policy and supporting text.	Policy back for an updated approach to planning and noise.	Yes
Policy 7.18 Local open space	Policy change to address deficiencies. Policy and supporting text changes to link to NPPF and set out criteria for open space audits.	Policy backing to address deficiencies and what to consider in open space audits.	Yes Assess in conjunction with Policies 2.18, 3.18, 4.8, 7.13, 7.23 and 8.2.
Policy 7.19 – Biodiversity and access to nature	Additional cross-references in policy.	Supports additional links to existing policies.	No
Policy 7.20 Geological conservation	Policy and supporting text update to reflect publication of new SPG and green infrastructure terminology.	Factual update . No effect on policy direction.	No Factual update
Policy 7.21 Trees and woodlands	Policy update to reflect publication of new SPG.	Factual update . No effect on policy direction.	No Factual update
Policy 7.23 –	Additional policy and	New policy support for re-use	Yes

Policy to be changed	Proposed change	Effect of policy change	Substantive change requiring IIA appraisal?
Burial space	supporting text to support the re-use of burial space	of burial space	Assess in conjunction with Policies 2.18, 3.18, 4.8, 7.13, 7.18 and 8.2.
Policy 7.25 – Increasing the use of the Blue Ribbon Network for passengers and tourism	Updated supporting text to note latest River Action Plan.	Factual update. No effect on policy direction.	No Factual update
Policy 7.27 Blue ribbon network: supporting infrastructure and recreational use	Policy change to seek the enhancement of waterway infrastructure and a more proactive approach where there is known demand.	Policy backing for the enhancement of waterway infrastructure.	Yes Assess with Policy 7.30 – Physical infrastructure.
Policy 7.30 London’s canals and other rivers and waterspaces	Policy update to link to new paragraph about Royal Docks in supporting text.	Policy backing for supporting text on the Royal Docks.	Yes Assess with Policy 7.27 – Physical infrastructure.
Chapter 8 – Implementation, Monitoring and Review			
Policy 8.1 Implementation	New policy approach and additional supporting text to support the delivery of development including through the use of MDCs, EZs, TIFs and HZs and delivery of infrastructure.	Policy backing for additional approach.	Yes Assess with Policy 2.11.
Policy 8.2 Planning Obligations	Policy change to widen scope regarding social infrastructure and include air quality improvements.	Policy backing to include social infrastructure and air quality improvements.	Yes Assess in conjunction with Policies 2.18, 3.18, 4.8, 7.13, 7.18 and 7.23.
Annex			
A1 Opportunity and Intensification Areas	Updated to include new opportunity areas, update names and update potential numbers of homes and jobs to be delivered	Reflects policy 2.13	Link to policy 2.13 - Opportunity Areas and Intensification Areas
A2 – Town Centres	Updated to reflect status and function of town centres	Reflects policies 2.15 – Town centres and Policy 4.7 – Town Centres and retail	Link to policy 2.15 – Town centres and Policy 4.7 – Town Centres and retail
A4 Housing	Updated to reflect SHLLA.	Reflects policy 3.3 Housing capacity	Link to policy 3.3 – Housing capacity
A5 Specialist housing for older people	New Annex to provide benchmarks for the delivery of housing for older people	Reflects policy 3.3 Housing capacity and 3.8 Housing choice	Link to policy 3.3 – Housing capacity and 3.8 Housing choice

Appendix 2 – Preferred options and alternative options¹⁴¹

Policy to be changed	Proposed change	Preferred options	Alternative options
General			
<p>Policy 1.1- Delivering the Strategic Vision and Objectives for London</p> <p>Policy 4.5 – London’s Visitor Infrastructure</p>	<p>Policy change to roll the Plan forward to 2036.</p>	<p>Roll forward Plan to 2036</p> <p>A 20 year plan period reflects the now repealed GOL Circular 01/2008, but remains best practice and this is reflected in the emerging London Planning Statement SPG.</p> <p>Whilst a 20 year plan period is important, the additional 5 years beyond the current plan period is uncertain due to the uncertainty over certain projections, especially the population projections.</p>	<p>Not to roll forward, ie retain projections to 2031.</p> <p>Roll forward further, 25 / 30 years.</p>
London’s Places			
<p>Policy 2.4 - The 2012 Games and their legacy</p>	<p>Outlines requirements for the matters that should be considered when the LLDC and boroughs are preparing Plans and making planning decisions.</p>	<p>To outline requirements for the matters that should be considered when the LLDC and boroughs are preparing Plans and making planning decisions</p>	<p>Not to set out matters.</p> <p>Set out different matters.</p>
<p>Policy 2.8 – Outer London: Transport</p> <p>Policy 6.13 - Parking</p>	<p>Policy alteration to note guidance on car parking. Supporting text seeks a more flexible approach.</p> <p>Updated car parking standards.</p>	<p>Include reference to a more flexible approach including changes to car parking standards.</p>	<p>Do not include a reference to flexibility.</p> <p>Do not alter car parking standards.</p> <p>Further alter the car parking standards to make them more flexible.</p>
<p>Policy 2.15 – Town centres</p>	<p>Policy alteration to note reduction in the rate of growth of comparison goods retail expenditure and new ways of shopping – internet and multi-channel and need to consider their impacts on town centres as well as surplus uses.</p> <p>Policy change to ensure land uses in town centres are actively managed to ensure the efficient use of land/premises, including scope to redevelop surplus retail/offices for higher</p>	<p>Include clear proactive policy to ensure efficient use of floorspace in town centres and encourage higher density housing, where appropriate.</p>	<p>Do not include proactive policy on efficient use of floorspace in town centres.</p> <p>Do not specifically encourage housing.</p> <p>Encourage other land uses.</p>

¹⁴¹Preferred policies and alternatives subject to change as policies develop and as advised by independent consultants carrying out the Full IIA Report.

<p>Policy 2.7 – Outer London: Economy</p> <p>Policy 4.7 – Retail and Town centre development</p> <p>Policy 4.8 – Supporting a successful and diverse retail sector</p>	<p>density housing/mixed use development.</p> <p>Policy alteration to note new ways of shopping – internet and multi-channel and need to consider their impacts on town centres.</p> <p>Policy change, noting that future levels of may involve consolidation</p> <p>Policy change to include additional measures for a proactive approach to retail planning.</p>		
<p>Policy 2.4 - The 2012 Games and their legacy Annex A2</p> <p>Policy 2.15 – Town centres</p> <p>Policy 4.7 – Retail and Town centre development</p>	<p>Changes to map to reflect status and function of town centres following Town Centre Health Checks.</p> <p>Capacity to reflect status and function of town centre</p> <p>Supports function of town centres</p>	<p>To update the status and function of town centres.</p>	<p>Do not update data.</p>
Chapter 3 - London's People			
<p>Policy 3.3 – Housing</p> <p>Policy 3.8 – Housing choice</p> <p>Policy 3.10 – Definition of affordable housing</p> <p>Policy 3.11 – Affordable housing targets</p> <p>Policy 2.7 – Outer London: Economy</p> <p>Policy 2.15 – Town centres</p>	<p>New link to housing provision monitoring table. Table 3.1 – figures updated</p> <p>Supports delivery of a range of housing within overall housing target</p> <p>Additional focus for potential housing provision in town centres with good transport links and opportunity areas.</p> <p>Add policy emphasis to provide higher density housing.</p> <p>Policy change to ensure land uses in town centres are actively managed to</p>	<p>Update housing monitoring table, including the potential of town centres and opportunity areas to encourage the delivery of housing.</p>	<p>Do not update table / leave figures as existing.</p> <p>Increase the numbers / alter methodology.</p> <p>Do not specifically focus on the potential of town centres.</p>

	ensure the efficient use of land/premises, including scope to redevelop surplus retail/offices for higher density housing/mixed use development.		
Policy 2.7 – Outer London: Economy Policy 2.13 – Opportunity areas and Intensification Areas Policy 2.15 – Town centres Policy 3.3 – Increasing housing supply Policy 3.7 – Large residential developments Policy 3.18 – Education	<p>Additional focus for potential housing provision in town centres with good transport links and opportunity areas.</p> <p>Add policy emphasis to provide higher density housing.</p> <p>Policy change to ensure land uses in town centres are actively managed to ensure the efficient use of land/premises, including scope to redevelop surplus retail/offices for higher density housing/mixed use development.</p> <p>Support for colocation of housing and educational facilities.</p>	<p>Include policies to support housing at higher densities in a variety of locations including town centres and opportunity areas and to support the provision of housing along with educational facilities to increase the overall delivery of housing.</p>	<p>Do not encourage housing provision in this wide variety of location.</p> <p>Only encourage housing in town centres, or opportunity areas or along educational facilities.</p>
Policy 3.8 – Housing choice	Change to policy to ensure appropriate housing provision is made for custom build and in the private rented sector.	Refer to additional specific groups / housing type that should be considered when planning for housing need.	<p>Do not refer to additional specific groups/type of housing.</p> <p>Only refer to custom build.</p> <p>Only refer to the private rented sector.</p>
Policy 2.18 – Green Infrastructure: The Network of Open and Green Spaces Policy 8.2 Planning obligations Policy 4.8 – Supporting a successful and diverse retail sector Policy 3.18 – Education facilities	<p>Policy change note that in deficiency areas, green infrastructure should be provided to help ‘address’ this deficiency, instead of ‘meet’.</p> <p>Policy change to reflect the guidance on green infrastructure in the NPPF. Change to policy and supporting text to support a greater variety of social infrastructure.</p> <p>Policy change to include local community assets.</p> <p>Extend policy and supporting text to cover secondary schools.</p>	<p>To include some flexibility in the policy to the retention / reprovision of social infrastructure.</p> <p>Extend policy and supporting text to cover specific types of infrastructure eg local community assets, secondary schools, playing fields.</p>	<p>Do not include flexibility / wider social infrastructure provision.</p> <p>Only refer to specific types of social infrastructure.</p>

Chapter 4 - London's Economy			
Policy 4.1 – Developing London's economy ¹⁴²	Policy and supporting text change to ensure the benefits from sustainable growth and development through infrastructure provision are maximised and general factual updates.	Change to ensure the benefits from sustainable growth and development through infrastructure provision are maximised.	Do not include reference to the maximising the benefits. Only seek to maximise the economic benefits.
Policy 4.10 – New and emerging economic sectors	Policy and supporting text changes to ensure land uses in town centres are actively managed to ensure the efficient use of land/premises, including scope to redevelop surplus retail/offices for higher density housing/mixed use development.	Include policies to ensure employment / workspace meets a variety of needs, including those of the emerging sectors of the economy.	Do not include policies to ensure employment / workspace meets emerging sectors of the economy. Only address known emerging economies eg tech-city type business.
Policy 2.9 – Inner London	Policy change to ensure appropriate workspace for areas of changing economy.		
Policy 4.3 – Mixed use development and offices	New policy to support small scale offices in the CAZ		
Chapter 5 - London's Response to Climate Change			
Policy 5.4A – Electricity and Gas supply	New policy and supporting text to promote the strategic provision of electricity and gas infrastructure to accommodate anticipated growth.	Include new policy to support gas and electricity infrastructure.	Do not include new policy to support gas and electricity infrastructure.
Policy 8.1 Implementation			
Policy 5.16 Waste self-sufficiency	Policy change to bring forward date for London to be self-sufficient in waste and factual statistical changes to supporting text.	Bring the target date for self-sufficiency to 2026.	Do not bring date forward to 2026. Select another target period.
Policy 5.17 – Waste capacity	Policy change setting performance criteria. Change to waste projections.	Include CO2 performance criteria for waste processing plant. Update waste projections.	Do no include CO2 performance criteria for waste processing plant. Include more stringent criteria. Include less stringent criteria. Do not update waste projections. Use a different (Defra) methodology.

¹⁴² Note policy already amended through process to reflect wider benefits of sustainable growth and development as opposed to purely economic benefits

Chapter 6 - London's Transport			
Policy 6.9 Cycling	Update policy to reflect the current delivery programme for cycle infrastructure. New and amended policies to include a proactive approach to supporting cycling infrastructure through both planning decisions and LDF preparation.	Include a proactive approach to supporting cycle infrastructure.	Do not include a proactive approach to supporting cycle infrastructure.
Chapter 7 - London's Living Places and Spaces			
Policy 7.1 Lifetime neighbourhoods	Policy change to clarify new concept and introduce the principles of lifetime neighbourhoods. General clarification in policy and inclusion of three principles throughout the policy.	Include policy changes to update and broaden policy considerations for design.	Do not include policy changes to update and broaden policy considerations for design. Only refer to amenity design improvements. Only include social design improvements.
Policy 7.3 Designing out crime	General policy changes to providing more detail and clarification.		
Policy 7.5 Public realm	Policy change to address management.		
Policy 7.15 Reducing noise and enhancing townscapes	Policy update.	Update the noise policy	Do not update the noise policy.
Policy 7.18 Local open space	Policy change to address deficiencies. Policy change to link to NPPF and set out criteria for open space audits	Update policies to support the provision of social infrastructure.	Do not update policies.
Policy 2.18 – Green Infrastructure: The Network of Open and Green Spaces	Change objective to address deficiency. Cross-reference to NNPF.		
Policy 7.13 Safety, Security and Resilience to Emergency	Policy change to support collaborative working and identify needs for community safety.		
Policy 7.23 – Burial space	Additional policy and supporting text to support the re-use of burial space.		
Policy 8.2 Planning Obligations	Policy change to widen scope regarding social infrastructure and include air quality improvements.		
Policy 7.30 London's canals and other rivers	Policy update to link to new paragraph about	Update policy to support waterway infrastructure and	Do not include update to link to paragraph in the

<p>and waterspaces</p> <p>Policy 7.27 Blue ribbon network: supporting infrastructure and recreational use</p>	<p>Royal Docks in supporting text.</p> <p>Policy change to seek the enhancement of waterway infrastructure and a more proactive approach where there is known demand.</p>	<p>link to paragraph in the supporting text – Royal Docks.</p>	<p>supporting text – Royal Docks.</p> <p>To apply this addition to waterspaces more widely.</p>
<p>Chapter 8 – Implementation, Monitoring and Review</p>			
<p>Policy 8.1 Implementation</p> <p>Policy 4.3 – Mixed use development and offices</p> <p>Policy 2.11 – Central activities zone – Strategic function</p>	<p>New policy approach and additional supporting text to support the delivery of development including through the use of MDCs, EZs, TIFs and HZs.</p> <p>New policy to support office development in general in the CAZ.</p> <p>New policy encouraging boroughs to proactively plan for the CAZ.</p>	<p>Include new policy approach to support the development and delivery of infrastructure.</p>	<p>Do not include new policy approach to support the development and delivery of infrastructure.</p>

Appendix 3

Equalities Background and Assessment

Equalities Impact Assessment

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

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

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

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

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

- c) **Encourage persons** who share a protected characteristic **to participate in public life or in any other activity** in which their participation by such persons is disproportionately low
- 4. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities
- 5. Having due regard to the need to **foster good relations** between persons who share a protected characteristic, and those who do not share it involves having due regard, in particular to the need to-
 - c. **Tackle prejudice**
 - d. **Promote understanding**
- 6. Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitted conduct that would otherwise be prohibited by or under this Act.

Commentary / Assessment

With regards to equalities, planning can have the most influence on elements 3 (a) and (b) of the Equalities Act 2010.

- 3. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –
 - a) **Remove or minimise disadvantages** suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) **Take steps to meet the needs of people** who share a relevant protected characteristic that are different from the needs of people who do not share it

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

Key issues

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

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

Key issues for the people with protected characteristics and the London Plan response

Protected characteristics	Issue with a planning influence	Planning policy influence	London Plan policy response	Assessment
Disability	Accessibility	Accessible homes	Policy 3.8 – Housing choice	<p>Approximately 15% of households that include one or more people with a long term limiting illness or disability feel that their current home is not suitable for their needs¹⁴³. London Plan policy encourages the provision of 10% of new housing to be designed to be wheelchair accessible. This is broadly in line with the percentage of Londoners that state that they are limited in daily activities because of a health problem or disability (14.2%)¹⁴⁴. Not all of these health problems or disabilities will be related to a physical disability.</p> <p>Over the coming years London’s population of over 65s is projected to increase significantly and therefore the Lifetime Homes approach set out in the London Plan remains important.</p> <p>These policies are further supported by detailed guidance in the Housing Supplementary Planning Guidance and the Mayor’s Housing Strategy.</p>
		Access to transport	<p>Policy 6.1 – Strategic approach</p> <p>Policy 6.7 – Better streets and surface transport</p> <p>Policy 6.10 – Walking</p> <p>Policy 7.2 – An inclusive</p>	<p>These policies encourage general access to transport, as well as for those with physical disabilities by specifically encouraging decluttering of the public realm and step-free access, and referring to dignity and access for all.</p> <p>The IIA for REMA recommended further measures to support cycling by disabled people. Including specific design</p>

¹⁴³ DCLG, The English Housing Survey 2012

¹⁴⁴ ONS 2011

			environment	<p>standards is too detailed for the strategic approach set out in the London Plan, TfL are taking this forward through its design standards for cycle stands.</p> <p>The proposed alterations seek provision for less conventional bicycle types.</p>
		Accessible buildings and public realm	<p>Policy 3.8 – Housing choice</p> <p>Policy 7.1 – Building London’s neighbourhoods and communities</p> <p>Policy 7.2 – An inclusive environment</p> <p>Policy 7.5 – Public realm</p>	<p>These policies encourage accessible environments, with specific policies for housing, including wheelchair housing and lifetime homes; and for the public realm.</p> <p>The ‘Accessible London: Achieving an inclusive environment SPG’ which is in the process of being updated provides further guidance on accessible environments.</p>
		Shop mobility schemes	Policy 7.2 – An inclusive environment	<p>This policy encourages accessible environments and supports the ‘Accessible London: Achieving an inclusive environment SPG’ which is in the process of being updated and is likely to provide further guidance on providing shop mobility schemes. The draft Town Centres SPG encourages the shop mobility scheme. Mentioning such a specific scheme in the London Plan is too detailed for a strategic plan.</p>

	Low incomes	Affordable housing	<p>Policy 3.8 – Housing choice</p> <p>Policy 3.10 – Definition of affordable housing</p> <p>Policy 3.11 – Affordable housing targets</p> <p>Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use schemes</p> <p>Policy 3.13 – Affordable housing thresholds</p>	<p>Of the 280,000 working-age adults whose day-to-day activities were limited a lot in London, most were not in paid work and almost all of whom were economically inactive¹⁴⁵. Of the 340,000 working-age adults whose day-to-day activities are limited a little in London, in Inner London 42% were inactive and 10% unemployed and for Outer London at 35% and 8% respectively¹⁴⁶. Of the children with at least one disabled adult, 54% live in poverty, compared with 34% of children in households with no disabled members¹⁴⁷.</p> <p>These policies seek the provision of affordable housing, including accessible affordable housing. The provision of affordable housing varies due to funding, viability and local need.</p> <p>More detailed guidance is provided in the Mayor’s Housing SPG.</p> <p>Further details on the Mayor’s support for affordable housing and accessible housing will be outlined in the Mayor’s Housing Strategy.</p>
	Crime	Designing out crime	<p>Policy 7.1 – Building London’s neighbourhoods and communities</p> <p>Policy 7.3 – Designing out crime</p>	<p>Disabled people are almost twice as likely to be victims of vandalism (19%) compared to 10% of people who do not have a disability¹⁴⁸.</p> <p>These policies encourage the design of buildings and the public realm to discourage crime, improve safety and contribute to a sense of security.</p>

¹⁴⁵ London’s poverty profile. Trust for London and New Policy Institute. 2013

¹⁴⁶ *ibid*

¹⁴⁷ DWP, Households below Average Income Reports, April 2011

¹⁴⁸ Homophobic Hate Crime. The Gay British Survey 2013. Stonewall. 2013

	Unemployment	Local employment and training opportunities associated with development	<p>Policy 4.1 – Developing London’s economy</p> <p>Policy 4.9 – Small shops</p> <p>Policy 4.12– Improving opportunities for all</p> <p>Policy 6.7 – Better streets and surface transport</p> <p>Policy 6.10 – Walking</p> <p>Policy 7.2 – An inclusive environment</p>	<p>Of the 280,000 working-age adults whose day-to-day activities were limited a lot in London, most were not in paid work and almost all of whom were economically inactive¹⁴⁹. Of the 340,000 working-age adults whose day-to-day activities are limited a little in London, in Inner London 42% were inactive and 10% unemployed and for Outer London at 35% and 8% respectively¹⁵⁰.</p> <p>These policies aim to support local initiatives to improve employment opportunities for Londoners, including through skills development and training opportunities. They also support the provision of smaller or low cost business space to support start-up and smaller businesses.</p> <p>Access to employment is also supported by the London Plan policies that support accessible transport, workspaces and wider environment.</p>
	Mental illness	Open space, tranquillity and greenery	<p>Policy 5.10 – Urban greening</p> <p>Policy 7.1 – Building London’s neighbourhoods and communities</p> <p>Policy 7.15 – Reducing noise and enhancing soundscapes</p> <p>Policy 7.18 – Protecting local open space and addressing local deficiency</p>	<p>Open space and greenery are known to improve overall health and well-being, but especially mental well-being. These policies aim to protect existing and encourage new open space and greenery across London.</p> <p>Being able to find refuge in quiet places is also beneficial to overall health and well-being, including mental illness. These policies support the protection of areas of tranquillity, which are most likely to be open spaces.</p> <p>The noise policy is proposed to be updated.</p>

¹⁴⁹ London’s poverty profile. Trust for London and New Policy Institute. 2013

¹⁵⁰ *ibid*

			<p>Policy 7.19 – Biodiversity and access to nature</p> <p>Policy 7.21 – Trees and woodland</p> <p>Policy 7.27 – Blue ribbon network: Supporting infrastructure and recreational use</p>	
Religion	Facilities	Burial space	Policy 7.23 – Burial space	<p>Up to 2031, London is projected to only be able to meet 20% of its demand for burial space. This will affect people of certain religions more than others.</p> <p>This policy encourages boroughs to protect existing and encourage new provision of burial space. To highlight this approach it is proposed to amend the policy to also encourage the re-use of burial space.</p>
		Community facilities / places of worship	<p>Policy 3.1 – Ensuring equal life chances for all</p> <p>Policy 3.16 - Protection and enhancement of social infrastructure</p>	<p>Christianity remains the largest religion in the capital (52.9% of Londoners), but has declined by 10% over the last 10 years. The second most common religion in London is Islam with 13.5% of Londoners. This is a rise from 9.3% in 2001. The following religions have the next largest representation - 5.5% Hindu, 2% Jewish, 1.7% Sikh, 1.1% Buddhist and 0.6% gave another religion¹⁵¹. There has also been a considerable change in the distribution of the population based on religious belief. This changing population will want facilities for their community.</p> <p>These policies encourage the retention and provision of a range of social infrastructure. It should be noted that</p>

¹⁵¹ ibid

				planning can secure appropriate physical space, but cannot secure funding for the long term management and operation of these facilities.
	Housing type	Larger homes	Policy 3.5 Quality and Design of Housing Developments Policy 3.8 – Housing choice	These policies encourage a range of housing types, including family housing and housing for larger families. More detailed guidance is provided in the Mayor’s Housing SPG and Housing Strategy.
		Specific design characteristics eg separate kitchen and living room	Policy 3.8 – Housing choice	This policy supports housing that takes into account the requirements of different groups. More detailed guidance is provided in the Mayor’s Housing SPG and Housing Strategy.
Age - Elderly	Housing type	Lifetime homes	Policy 3.8 – Housing choice Policy 7.2 – An inclusive environment	There is a significant projected growth in the 65+ population projected growth from 900,000 in 2011 to over 1.5 million by 2041 ¹⁵² . These policies support the provision of housing that will remain suitable for occupants over their lifetime. More detailed guidance is provided in the Mayor’s Housing SPG.
		Smaller homes	Policy 3.8 – Housing choice	These policies encourage a range of housing types, including smaller homes. More detailed guidance is provided in the Mayor’s Housing SPG.

¹⁵² ibid

		Housing with an element of care	Policy 3.8 – Housing choice	There is a significant projected growth in the 65+ population projected growth from 900,000 in 2011 to over 1.5 million by 2041 ¹⁵³ . This policy supports housing that takes into account the requirements of different groups and specifically refers to the changing age structure of London's population and in particular the varied needs of older Londoners, including for supported and affordable provision. Proposed policy changes will seek to further encourage / support the delivery of housing for older people.
	Health	Spaces that support mobility and encourage social interaction	Policy 7.1 – Building London's neighbourhoods and communities Policy 7.2 – An inclusive environment Policy 7.5 – Public realm	These policies support a public realm that encourage healthy and active lives, including social infrastructure such as public toilets.
		Community health facilities and centres	Policy 3.16 - Protection and enhancement of social infrastructure Policy 3.17 – Health and social care facilities	These policies encourage the retention and provision of a range of social infrastructure. It should be noted that planning can help secure appropriate physical space, including for health facilities and community centres. Planning cannot secure funding for the long term management and operation of these facilities. Funding for many services is being reduced.

¹⁵³ *ibid*

Age - Young people	Facilities	Playspace (formal or informal)	Policy 3.6 – Children and young people’s play and informal recreation facilities Policy 3.19 – Sports facilities	Safe and stimulating play facilities are essential for children and young people to develop physically and socially. Play London state that nearly half of children in London surveyed say they do not play out as much as they like. A third say they would play out more if it were safer. This is around 10% higher than the UK average ¹⁵⁴ . These policies encourage the provision of both formal and informal playspace, both on and off-site. Proposed policy changes encourage the early consideration of how communal public realm will be managed over the long term.
		Community facilities	Policy 3.1 – Ensuring equal life chances for all Policy 3.16 - Protection and enhancement of social infrastructure	These policies encourage the retention and provision of a range of social infrastructure. It should be noted that planning can help secure appropriate physical space, but cannot secure funding for the long term management and operation of these facilities.
		Childcare	Policy 3.16 - Protection and enhancement of social infrastructure	This policy encourages the retention and provision of a range of social infrastructure. It should be noted that planning can help secure appropriate physical space, but cannot secure funding for the long term management and operation of these facilities.
		Education places	Policy 3.16 - Protection and enhancement of social infrastructure Policy 3.18 – Education facilities	In 2011/12, London had just under 1.1 million children in its education system. This figure is set to grow year on year to approximately 1.25 million by 2016/17 ¹⁵⁵ . This policy encourages the retention and provision of a range of social infrastructure, including schools. It should be noted that planning can secure appropriate physical space for schools but cannot secure funding for the long term management and operation of these facilities.

¹⁵⁴ <http://www.londonplay.org.uk/index.php>

¹⁵⁵ London Councils

	Crime and safety	Designing out crime	Policy 7.1 – Building London’s neighbourhoods and communities Policy 7.3 – Designing out crime	These policies encourage the design of buildings and the public realm to discourage crime, improve safety and contribute to a sense of security.
Ethnicity	Housing type	Larger homes	Policy 3.8 – Housing choice	The majority of households, in all ethnic groups in London, lived in accommodation that was neither overcrowded nor under-occupied, based on the number of bedrooms. Overcrowding was greatest in households whose head had Bangladeshi ethnicity at 35.8% of households. This was followed by 27% of African, 25.5% of Pakistani and 20.5% of Gypsy and Irish Traveller households being overcrowded ¹⁵⁶ . These policies encourage a range of housing types, including family housing and housing for larger families.
		Specific design characteristics eg separate kitchen and living room	Policy 3.8 – Housing choice	This policy supports housing that takes into account the requirements of different groups. More detailed guidance is provided in the Mayor’s Housing SPG.
	Unemployment	Local employment and training opportunities associated with development	Policy 4.1 – Developing London’s economy Policy 4.9 – Small shops Policy 4.12– Improving opportunities for all	These policies aim to support local initiatives to improve employment opportunities for Londoners, including through skills development and training opportunities. They also support the provision of smaller or low cost business space to support start-up and smaller businesses.
		Affordable housing	Policy 3.8 – Housing choice Policy 3.10 – Definition of	These policies seek the provision of affordable housing, including accessible affordable housing. The provision of affordable housing varies due to funding, viability and local

¹⁵⁶ ibid

			affordable housing Policy 3.11 – Affordable housing targets Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use schemes Policy 3.13 – Affordable housing thresholds	need. More detailed guidance is provided in the Mayor’s Housing SPG and Housing Strategy.
	Facilities	Community facilities	Policy 3.1 – Ensuring equal life chances for all Policy 3.16 - Protection and enhancement of social infrastructure	This policy encourages the retention and provision of a range of social infrastructure. It should be noted that planning can secure appropriate physical space, but cannot secure funding for the long term management and operation of these facilities.
	Health	Spaces that encourage physical activity	Policy 3.2 – Improving health and addressing health inequalities Policy 7.1 – Building London’s neighbourhoods and communities Policy 7.2 – An inclusive environment Policy 7.5 – Public realm	These policies support public realm that encourage healthy and active lives, including social infrastructure such as public toilets.
		Community health facilities	Policy 3.16 - Protection and enhancement of social infrastructure Policy 3.17 – Health and social care facilities	This policy encourages the retention and provision of a range of social infrastructure. It should be noted that planning can secure appropriate physical space, cannot secure funding for the long term management and operation of these facilities.
Gender - female	Childcare	Childcare facilities	Policy 3.16 - Protection and enhancement of social infrastructure	This policy encourages the retention and provision of a range of social infrastructure. It should be noted that planning can secure appropriate physical space, but cannot secure funding for the long term management and operation

				of these facilities.
		Playspace	Policy 3.6 – Children and young people’s play and informal recreation facilities Policy 7.1 – Building London’s neighbourhoods and communities	These policies encourage the provision of both formal and informal playspace, both on and off-site. Proposed policy changes encourage the early consideration of how communal public realm will be managed over the long term.
		Accessible environment	Policy 6.1 – Strategic approach Policy 6.7 – Better streets and surface transport Policy 6.10 – Walking Policy 7.2 – An inclusive environment Policy 7.5 – Public realm	These policies encourage general access to transport by specifically encouraging decluttering and step-free access, and referring to dignity and access for all. These policies also encourage accessible environments. The ‘Accessible London: Achieving an inclusive environment SPG’ which is in the process of being updated provides further guidance on accessible environments.
	Violence	Affordable housing	Policy 3.8 – Housing choice Policy 3.10 – Definition of affordable housing Policy 3.11 – Affordable housing targets Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use schemes Policy 3.13 – Affordable housing thresholds	These policies seek the provision of affordable housing, including accessible affordable housing. The provision of affordable housing varies due to funding, viability and local need.
	Crime and safety	Designing out crime	Policy 7.1 – Building London’s neighbourhoods and communities	These policies encourage the design of buildings and the public realm to discourage crime, improve safety and contribute to a sense of security.

			Policy 7.3 – Designing out crime	
Sexual orientation	Crime and safety	Designing out crime	Policy 7.1 – Building London’s neighbourhoods and communities Policy 7.3 – Designing out crime	Research ¹⁵⁷ found 1 in 8 (13%) of lesbian, gay and bisexual victims have had their homes, vehicle or property damaged. These policies encourage the design of buildings and the public realm to discourage crime, improve safety and contribute to a sense of security.
Pregnancy and maternity	Accessibility	Access to transport	Policy 6.1 – Strategic approach Policy 6.7 – Better streets and surface transport Policy 6.10 – Walking Policy 7.2 – An inclusive environment	These policies encourage general access to transport by specifically encouraging decluttering and step-free access, and referring to dignity and access for all.
		Accessible buildings and public realm	Policy 3.8 – Housing choice Policy 7.1 – Building London’s neighbourhoods and communities Policy 7.2 – An inclusive environment Policy 7.5 – Public realm	These policies encourage accessible environments, with specific policies for housing and for the public realm.

¹⁵⁷ Homophobic Hate Crime. The Gay British Survey 2013. Stonewall. 2013