

Ms Sian Fletcher comments

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I do not think the Interrogated Impact Assessment (IIA) carried out by Ove Arup & Partners Ltd is fit for purpose for the following reasons:

1. The process has not been in line with the Supreme Court's requirements of a fair consultation. The IIA did not take place at the formative stages of the proposal. Nor is the current consultation easily accessible on the GLA website. The consultation has taken place too late in the process. .
2. The SAE Directive states: The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative". Where are the alternatives suggested and analysed? We would like to suggest that a community-generated alternative option be part of the process such as Just Space's publication Towards a Community Led Plan for London'.
3. The graphs in the IIA used to digest much information and then coloured coded to show acceptability are far too vague in what the axes terms are, what the parameters are and what they are concluding. There is too much information with little differentiation between either groups or boroughs. This is also too much either unknown or left blank on these graphs to make a reasonable decision about their conclusions. The analysis in this IIA Report is too generalised. It writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups
4. the IIA is required to include the preparation of a health inequalities strategy /promoting reduction of health inequalities. Many of the objectives and guiding questions for each topic do not address each of these such as equalities or health despite the attempt to colour code questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be of use, all of components of the assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Section A.4.3 also says that there will be a separate Equalities assessment which is contradicted by section A.3.7 which states that the Equalities assessment is an integral part of the IIA.
5. The IIA process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. If it does not done this adequately and therefore has not done what an impact assessment is required to do,

6. The Examination in Public (EiP). Section 1.2.4 states that both the draft London Plan and the IIA will be subjected to London Plan IIA: However, it is not clear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.