

London Plan Examination in Public, Matter 1 Sustainability Appraisal

Friends of the Earth (755)

M1. Does the Integrated Impact Assessment (IIA) and Addendum Report (NLP/CD/04 & 05) meet legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment? In particular:

a) Is it suitably comprehensive and has it sufficiently evaluated reasonable alternatives and does it provide a basis for future monitoring?

b) Have the recommendations made within the IIA been adequately addressed within the Plan?

1. We have a number of concerns regarding the Integrated Impact Assessment relating to how the IIA has been carried out and recommendations have informed the preparation of the Plan. These are as follows:
 1. A lack of clarity regarding how the IIA has shaped plan policies
 2. Selection and evaluation of options and alternatives
 3. Assessment of policies against IIA objectives
 4. Approach to assessing cumulative impact

A lack of clarity regarding how the IIA has shaped plan policies

2. The IIR draft Environment Report was published in November 2017 shortly before the publication of the Draft Plan. As the Draft Plan is also the version submitted for examination (incorporating the Mayor's minor changes) there is no scope for consultation responses, informed by the IIA, to influence plan policies and proposals prior to submission. The initial consultation '*A City for all Londoners*' was general and did not set out draft policies. The iterative benefits of SEA and associated consultation are diminished as a result.
3. More broadly, there is a lack of transparency and clarity in the way that the IIA has informed the drafting of the plan and selection of preferred options as reflected in the Draft Plan.

Selection and evaluation of options and alternatives

4. We consider the selection and evaluation of alternative approaches inadequate. We question the extent to which the IIA meaningfully evaluates alternatives since the range of alternatives selected for evaluation was too narrow and robustness of some options is in doubt.
5. Given the draft Plan commitment to making London zero carbon it is surprising that "a sustainable economy" does not feature among options selected for evaluation in connection with Policy GG5 *Growing a Good Economy*. Such an option would seek to foster enterprise and business activities that make a direct, positive contribution to making London zero-carbon and discourage and disincentivise development and related activity which seeks to meet policy through an approach based on 'offsetting', that is paying for carbon reduction elsewhere. London's economy has significant environmental and other impacts throughout the Capital and beyond These aspects warrant consideration, yet other than a reference to

'sustainable land use' and making "*the fullest use of London's existing and future public transport, walking and cycling network*", no consideration is given to planning for an economy that is environmentally sustainable.

6. The *Community Led Plan for London: Policy directions and proposals* co-ordinated by Just Space, in our view deserves serious consideration as an alternative. Offering a vision for a fairer, more sustainable London, this sets out a range of planning measures necessary to achieve this. A result of extensive analysis, consultation and deliberation over two years, it is disappointing that Just Space's plan, or a similar approach, was not evaluated as an alternative. By omitting to evaluate other more environmentally sustainable, socially inclusive approaches to planning for London, such as Just Space's Community Led Plan, the IIA is insufficiently comprehensive.

Appraisal of Strategic Options

7. Some options selected for evaluation are in our view unreasonable. Examples include "*leaving the delivery of housing to market forces*" under "*Delivering the homes Londoners need*" and "*market forces*" under "*growing a good economy*". Both options describe an approach which is the antithesis of good planning and therefore unsound. This calls into question why such options were selected in the first place (an exception to this would be evaluating existing policy/do nothing as an option, which can be helpful whether reasonable or not), given the variety of possible reasonable alternatives that should have been identified and evaluated. A market-led approach would not address London's housing needs and communities and the environment would suffer as a consequence.
8. With regard to the option entitled 'meeting housing need' the IIA states: "*However, delivery of housing under this option does not necessarily consider affordability, and may price some workers out of the city*". It is unclear why the IIA considers an option predicated on housing need should price some workers out of the city - a market led approach would surely be more likely to do so. The ability to afford housing, whether social, market or intermediate for different groups, especially for those on low to middle incomes, must surely be taken into account when planning to meet 'housing need'.
9. A number of options are presented as alternatives which can at best be considered partial and exclude elements needed to make them '*reasonable*'. Overall, we concur with the comment by the Royal Borough of Kingston in their response that "*The IIA considers 'options' in a shallow and binary way which does not suggest proper consideration of a range of approaches to deliver housing - rather a mechanistic application of the small sites approach to make up the shortfall between the capacity identified through the London Development Database and London's housing need*" (IIA post consultation Addendum report July 2018).

IIA assessment of plan policies

10. We are not confident that the IIA assessment of draft policies is robust and consider there are major flaws in the way some policies have been scored against IIA objectives. Some examples are set out in the following paragraphs.
11. The assessment for *Policy SD1 Opportunity Areas* against Objective 20 *To protect, connect and enhance London's natural capital (including important habitats, species and landscapes)*

and the services and benefits it provides cites a positive impact. Yet this policy, despite its length, is silent with regard to the environment: with the exception of a reference to environmental barriers, the environment does not feature at all. The correct score for SD1 against this objective should be red. To address this deficiency requires the policy to be revised to reflect the environmental dimension of sustainable development, green infrastructure (including biodiversity, accessible green space, flood mitigation, habitats). It is essential that sustainable and green infrastructure is factored in at a high, ie strategic level, in the planning of opportunity areas.

12. The IIA concludes that under the “market forces” strategic option (Growing a Good Economy) “*environmental objectives are not directly affected*”, yet out of all approaches a market approach is most likely not to achieve them. The resulting options are deficient and hence unreasonable, since an economy cannot be good if it is environmentally unsustainable. It is acknowledged that elsewhere the plan seeks to achieve a ‘circular economy’ however, this is just one aspect among many of sustainable development (and itself dependent on the scale/volume of activity and materials which beyond a certain level may be circular but not sustainable).
13. Another example of where the IIA assessment is flawed is that it omits to evaluate the loss of the Sustainable Residential Quality density matrix (Policy D6 Optimising Housing Density) and its proposed replacement with a design led approach. While the Housing Density Topic Paper explains why the matrix has been omitted, noting that guidelines were not always followed, the paper does not properly consider the ramifications of omitting the matrix. Design is a key consideration and acknowledges that a one size approach does not fit all, however, in the absence of clear guidelines there is a risk that housing numbers will take precedence over the quality, type and size of homes causing harm to surroundings and amenity. There is a risk that the loss of clear guidelines will lead to compromises such no provision of family housing, green space, overdevelopment (with knock on effects on amenity and infrastructure) and a poor quality public realm as landowners/developers seek to maximise the number of homes a site can accommodate. Some of these matters the IIA should have picked up in its assessment.

Cumulative impact

14. A key aspect of carrying out a Sustainability Appraisal concerns consideration of cumulative impacts. We question whether sufficient account has been taken, both in the IIA and London Plan, of neighbouring authorities’ strategic priorities and growth plans set out in adopted and emerging plans. This is essential in order understand cross-boundary impacts and develop effective policy responses in light of these.

Basis for future monitoring

15. It is unclear how the IIA would provide a basis for future monitoring.

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