

- 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<sup>1</sup>?**
- 1.1 The IIA and Addendum Report meet all legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment. They are suitably comprehensive, have sufficiently evaluated reasonable alternatives and provides a basis for future monitoring. The recommendations within the IIA have been appropriately addressed within the Plan.
- 1.2 Sustainability Appraisal (SA) is a systematic process that is carried out during the preparation of a development plan. The SA process considers the way a plan can contribute to environmental, social and economic improvements. It is also used to identify and mitigate any potential adverse effects that a plan may otherwise have. This ensures that reasonable alternatives are considered and that the policies and (any) allocations in plans are the most appropriate.
- 1.3 Section 1.1.1 of the IIA sets out the approach to the appraisal in line with current legislation. Under the requirements of the Planning and Compulsory Purchase Act (2004), SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations (2004), which implements the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC). The SEA Directive requires an assessment of the likely significant environmental effects arising from a plan or programme and sets out the stages that should be followed to undertake this. The IIA process follows the methodology and stages of the SEA Directive, as described and explained in Section 3 of the IIA report.
- 1.4 In addition to SEA, the IIA also combines the requirements for Equality Impact Assessments in relation to the Equality Act 2010; a Community Safety Impact Assessment in relation to the Crime and Disorder Act 1998 (as amended) and Police and Justice Act 2006; and a Health Impact Assessment. In combination, drawing these assessments together within a single IIA provides a more comprehensive overall assessment of the Plan.
- 1.5 A comprehensive review of baseline information was gathered and analysed as part of the Scoping Report<sup>2</sup>. The key issues derived from this analysis informed the development of the IIA Framework, which is set out in Table 16 of the report. The Framework used key guiding questions to assess the policies against a range of criteria, covering environmental, social and economic issues.
- 1.6 As set out in Table 17 of the IIA report, a significance rating was applied to each assessment in line with how it met the guiding questions, which is an established approach in SEA. Where a negative or neutral impact was identified, the assessment

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<sup>1</sup> All references to “the Plan” are to the draft London Plan (December 2017) incorporating the Mayor’s Minor Suggested Changes (August 2018)

<sup>2</sup> NLP/CD/03 Mayor of London, Integrated Impact Assessment Scoping Report, February 2017

set out recommendations to improve the strength of the policy in meeting the objective. Where the assessment identified significant adverse effects, measures were identified that could be implemented to avoid or reduce the magnitude. Where there was insufficient information to make a robust assessment, the assessment outcome was unknown. In some instances, the assessment of options could have both positive and negative effects and it was not clear which effects outweighed one another. In these instances, recommendations identified additional information or clarifications to inform the assessment. Following the first assessment, a refinement of some of the options and policies led in some instances to changes in the scoring. This was then reflected in the assessment in the IIA Report.

- 1.7 All strategic options and policies were assessed against the guide questions. Underpinning the overall findings in the IIA report, for each iteration of every policy, including the strategic options, is a detailed matrix with commentary setting out a summary against each of the 24 objectives per assessment (i.e EqIA, SEA/SA, CSIA and HIA), a commentary of the potential cumulative effects per assessment (EqIA, SEA/SA, CSIA and HIA) per objective, and any mitigation recommendations per assessment per objective, as well as the GLA response to those recommendations. Due to proportionality principle, and in response to evolving guidance on the approach of IIAs such as the Royal Town Planning Institute (RTPI) Practice Advice<sup>3</sup> on SEA, suggesting a move away from volumes of data in matrixes towards a more narrative approach, it was decided that publishing one overall matrix plus a page of narrative distilling the key issues from the assessment per final policy was a reasonable and practical approach.
- 1.8 The IIA Report<sup>4</sup> and the draft London Plan<sup>5</sup> were issued for public consultation in December 2017. Consultation on the draft London Plan resulted in further changes to the policies - called Minor Suggested Changes. These were reviewed and those which changed the original IIA scoring were reassessed. Public consultation on the IIA Report also identified further considerations, which were incorporated into the reassessment as appropriate. These changes and associated changes to the scoring matrices to policies are set out in the IIA Addendum Report<sup>6</sup>.
- 1.9 This entire process is set out in Sections 8 and 9 of the IIA Report, including the original appraisal, suggested recommendations, the GLA response to the recommendations, and the updated narrative. The IIA Addendum Report sets out the post-consultation appraisal.

#### Assessment of options

- 1.10 The comprehensive baseline identified key sustainability issues specific to London. These issues were used to inform the initial alternative spatial options for accommodating London's growth and the development of the other strategic options. The Scoping Report identified 3 spatial options: the current London Plan, Sustainable Intensification and the City Region Approach. However, following consultation on the Scoping Report, these options were broadened out to include two additional options; the current London Plan approach with selective release of the Green Belt (previously

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<sup>3</sup> RTPI / Levett-Therival, Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018

<sup>4</sup> NLP/CD/04 Arup, London Plan Integrated Impact Assessment for the draft New London Plan, November 2017

<sup>5</sup> NLP/CD/01 Mayor of London, Draft London Plan, December 2017

<sup>6</sup> NLP/CD/04 Arup, London Plan Integrated Impact Assessment for the draft New London Plan, November 2017

included as part of the City Region Approach) and a Polycentric approach based around a more dispersed pattern for economic growth.

- 1.11 The other strategic options were developed based around the 6 Good Growth objectives identified as being strategic priorities for the Mayor (including GG2 Best Use of Land which encapsulated the spatial options to assess alternative strategic land use for London). A workshop was held, attended by GLA officers and the consultant undertaking the IIA (Arup), to develop the strategic options to ensure that robust and implementable options were advanced for assessment.
- 1.12 Each of the 6 Good Growth objectives included between three to five alternative options centred around realistic policy assumptions. After the workshop, the emerging strategic options (including the spatial options) were amended to ensure they were complete and consistent and that they fully represented reasonable alternatives in line with Government Planning Practice Guidance<sup>7</sup> on sustainability appraisals. The strategic options were then reviewed and assessed using the IIA framework guide questions, which identified the potential effects of each option and, where appropriate, provided recommendations to refine the options. The preferred options for each of the Good Growth policies often resulted from a combination of the alternatives options, containing positive elements or recommendations from each assessment. Section 8 of the IIA report sets out the assessment of each strategic option.
- 1.13 Detailed assessment of the alternative spatial options outlined under GG2 Making Best Use of Land concluded that the preferred option was Sustainable Intensification as it scored highly on a range of objectives. Namely, it would support the delivery of employment and residential space enabling London to remain competitive, encouraging an efficient use of land, and ensuring that growth and economic diversification is facilitated. In promoting public and active transport options, this option also brings other benefits such as reducing emissions and noise and improving air quality.

### Monitoring

- 1.14 As part of the appraisal and recommendation assessment of each policy, aspects for consideration as part of a future monitoring regime are discussed where appropriate. The IIA states under what circumstances particular effects are likely to be realised and therefore identifies the key areas to be considered during monitoring. The IIA does not highlight specific monitoring measures at this stage, as the primary driver for monitoring will be a revised Annual Monitoring Report based on the final version of the new London Plan. Any formalisation of monitoring measures at this stage could be considered pre-emptive or restrictive.
- 1.15 The IIA Post Adoption Statement, which will meet a specific requirement of the SEA Directive, will highlight the sustainability aspects that require monitoring, the extent to which the Annual Monitoring Report addresses these aspects and the additional measures needed to monitor effects, and how these can be implemented. The IIA Post Adoption Statement will also confirm how the monitoring framework has been developed in light of views expressed during consultation and Examination in Public.

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<sup>7</sup> Ministry of Housing, Communities and Local Government, Strategic environmental assessment and sustainability appraisal (2015). Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

## Recommendations

- 1.16 All recommendations made through the assessment were reviewed and, where appropriate, amendments to policies were made. Where the recommendations were not considered feasible or implementable, a reason was provided, which is recorded in the IIA Report. In many instances, the recommendation related to issues covered by other policies considerations from elsewhere in the Plan. As the Plan is meant to be read as a whole, it is not feasible or necessary to detail every cross-link between every policy within the Plan. In other cases, the recommendations were either outside the scope of planning or were more relevant to other Mayoral Strategies or to local plans. Any changes that occurred during the drafting and post-consultation stages, were assessed, with recommendations provided, and the assessments updated accordingly.
- 1.17 The following policies, including supporting text as appropriate, were amended following recommendations as part of the appraisal as set out in the IIA Report: SD2, SD3, SD6, SD7, D1, D2, D3, D4, D7, D8, H10, H11, H14, H15, H16, S1, S3, S4, S5, S6, E3, E8, E10, E11, HC1, HC2, HC3, HC4, HC5, HC6, HC7, G2, G3, G4, G5, G6, G7, G9, SI1, SI2, SI3, SI5, SI6, SI12, SI13, SI14, T1, T4, T5, and DF1.