

Greater London Authority

London Plan

Integrated Impact Assessment

Post-consultation addendum report

Issue | 20 July 2018

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

The Draft New London Plan has undergone a full review through the Integrated Impact Assessment (IIA) process. This assessed the impacts of different spatial options and policies within the London Plan against environmental, equality, health and community safety objectives. The assessment made recommendations to inform the final spatial options and policies within the London Plan, to maximise benefits and minimise any adverse effects which may occur as the London Plan is implemented.

The Draft New London Plan and IIA were issued for consultation in December 2017. Consultation responses were collated and analysed and appropriate amendments have been made. A review of the Policy amendments has taken place to identify those changes which alter the original assessment and are reported in this document. This document has been prepared for the Inspector to inform the Examination in Public phase, to be held towards the end of this year.

Policy changes have been reassessed in line with the methodology and IIA Framework used to undertake the 2017 IIA. An initial screening exercise was undertaken to distinguish between minor wording amendments and substantial changes to the policy content. Where changes to the policy were considered to alter the meaning, direction or outcome of the policy, additional narrative surrounding these changes has been provided and the assessment matrices updated where appropriate. In some instances, policy changes warranted additional narrative within the addendum report, however did not require changes to the scoring matrices. Consultation responses specific to the IIA have also been assessed and this document provides a response to those comments received and, where appropriate, changes to the assessments and scoring matrices have been made as a result.

Following the public examination and sign off by the Secretary of State, the final London Plan will be published alongside a revised IIA report.

2 Consultation

The IIA report was open for consultation alongside the draft London Plan between December 2017 and March 2018. Table 1 contains a summary of those comments relevant to the IIA and a response to each one.

Section 0 contains the full policy appraisals. Reassessments have been undertaken which consider the consultation comments on the IIA Report and changes to the policy text as a result of consultation on the London Plan itself.

Table 1: Consultation responses related to the draft London Plan IIA

Commenter	Comment summary	Response
Leslie Barson	The IIA consultation did not take place at all stages and was too late in the process.	The approach adopted in the IIA follows the stages of Strategic Environmental Assessment (SEA) in line with The Environmental Assessment of Plans and Programmes Regulations, 2004. Following the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006, consultation with the public occurs at Stage D of the SEA. Consultation with Statutory Consultees on the Scoping Report is required at Stage A and was undertaken in February 2017.
	It is unclear where reasonable alternatives have been suggested and analysed. There is also too much information with little differentiation between groups or boroughs. There is too much left unknown or blank for a reasonable conclusion to be made.	Strategic alternatives have been assessed under Section 8 of the IIA report, following the SEA guidance.
	Many of the objectives and guiding questions for each topic do not address equality and health aspects. In particular, equalities impacts are under-represented. Section A.4.3 of the Scoping Report states there will be a separate EqIA, although section A.3.7 says it will be integrated.	Objectives 1, 2 and 4 are directly related to equality and health. Objectives 1-15 and 17-24 all contain guiding questions related to health and/or equality. The assessment is fully integrated and policies have been assessed against these objectives multiple times. The EqIA has been integrated into the IIA, alongside the HIA, CSIA and SEA.
	It is unclear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.	At the EiP it will need to be demonstrated that the IIA has met the legal requirements of relevant legislation.
London Community Neighbourhood Co-operative	The IIA consultation did not take place at all stages and was too late in the process.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004. Following the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006, consultation with the public occurs at Stage D of the SEA. Consultation with Statutory Consultees on the Scoping Report is required at Stage A and was undertaken in February 2017.
	It is unclear where reasonable alternatives have been suggested and analysed. There is also too much information with little differentiation between groups or boroughs. There is too much left unknown or blank for a reasonable conclusion to be made.	Strategic alternatives have been assessed under Section 8 of the IIA report, following the SEA guidance.
	Many of the objectives and guiding questions for each topic do not address equality and health aspects. In particular, equalities impacts are under-represented. Section A.4.3 of the Scoping Report states there will be a separate EqIA, although section A.3.7 says it will be integrated.	Objectives 1, 2 and 4 are directly related to equality and health. Objectives 1-15 and 17-24 all contain guiding questions related to health and/or equality. The assessment is fully integrated and policies have been assessed against these objectives multiple times. The EqIA has been integrated into the IIA, alongside the HIA, CSIA and SEA.
	It is unclear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.	At the EiP it will need to be demonstrated that the IIA has met the legal requirements of relevant legislation.
Jane Hickson	The consultation for the IIA has come too late in the process.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004. Following the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006, consultation with the public occurs at Stage D of the SEA. Consultation with Statutory Consultees on the Scoping Report is required at Stage A and was undertaken in February 2017.
	The assessment is vague, generalised and lacks substance. It does not provide an in-depth discussion.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004 and follows the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006. The London Plan is a high level, strategic document for boroughs to take into account when undertaking planning decisions in London.
	There are too many unknowns in the assessment, particularly regarding health issues, to make them valid.	The London Plan is a strategic document and specific impacts at the borough levels are hard to determine. The question marks identify that the objective is still relevant to that Policy, but further detail may be required, which will typically come at the borough-level. Health and equalities are particularly complex issues and vary considerably across London. The London Plan leaves scope for boroughs to implement the policies in a way that is appropriate for them.
Sian Fletcher	The IIA consultation did not take place at all stages and was too late in the process.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004. Following the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006, consultation with the public occurs at Stage D of the SEA. Consultation with Statutory Consultees on the Scoping Report is required at Stage A and was undertaken in February 2017.

Commenter	Comment summary	Response
	It is unclear where reasonable alternatives have been suggested and analysed. There is also too much information with little differentiation between groups or boroughs. There is too much left unknown or blank for a reasonable conclusion to be made.	Strategic alternatives have been assessed under Section 8 of the IIA report, following the SEA guidance.
	Many of the objectives and guiding questions for each topic do not address equality and health aspects. In particular, equalities impacts are under-represented. Section A.4.3 of the Scoping Report states there will be a separate EqIA, although section A.3.7 says it will be integrated.	Objectives 1, 2 and 4 are directly related to equality and health. Objectives 1-15 and 17-24 all contain guiding questions related to health and/or equality. The assessment is fully integrated and policies have been assessed against these objectives multiple times. The EqIA has been integrated into the IIA, alongside the HIA, CSIA and SEA.
	It is unclear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.	At the EiP it will need to be demonstrated that the IIA has met the legal requirements of relevant legislation.
Newham Union of Tenants	The Plan has not adequately reviewed alternative options in relation to both quantitative and qualitative outputs, despite the comparison of strategy options in the Integrated Impact Assessment.	Strategic alternatives have been assessed under Section 8 of the IIA report, following the SEA methodology.
Royal Borough of Kensington	The plan directs growth to local town centres and suburbs, which would alter the character of these areas. In some areas it would also drive a shift from houses to flats. This is also accompanied by policies protecting Green Belt and MOL. The assessment has not considered the possibility of development on some of London's MOL and Green Belt, which could minimise harm but also reduces the impact on town centres. The IIA considers this option but in a shallow and binary way which does not suggest proper consideration of a range of approaches to delivering housing. Communities place immense value on Green Belt and MOL, but they also value their suburbs, gardens and town centres.	The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered to be the preferred option. The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.
	Rather than increasing housing availability, this approach could drive up house prices as the market value of family homes is reassessed as the value of a development site with multiple housing units. The IIA has not considered the impact on the affordability of family housing.	The H2 Small sites policy actively encourages boroughs to include affordable housing requirements for small sites in their local plans and to resist processes which result in the sustained loss of homes for larger families (4.2.10 of the Policy). The assessment has considered affordability and the range of housing needs in small sites.
	The aims of GG5 (B) is to share economic success more equitably in London, but this is not expressed in other sections of the Plan and the IIA rejects the option of a polycentric city.	The preferred option still considers outer London and the sharing of growth, but also supports traditional economic centres, such as the CAZ.
Just Space	There is no easy read version of the IIA, no British Sign Language (BSL) or Makaton versions. Therefore the document is inaccessible for those people who need these formats and could be held contrary to the Equality Act, European Convention on Human Rights and other international law (e.g. UN Convention on the Rights of Persons with Disabilities). Suggested videos or short versions of printed/online reports.	A non-technical summary of the IIA is provided, as required under the SEA Directive (Annex 1(j)). An easy-read version of the London Plan is also available.
	The Community-led London Plan prepared by Just Space was not considered an alternative by the GLA but rather alternatives were explored for each of the Mayor's 6 main objectives. Therefore, key choices in the London Plan have not been evaluated or evaluated adequately in the IIA. These include: inclusion / exclusion of extensive council estate demolition; emphasis on increased radial transport capacity (CR2 etc.) versus improved suburban bus and orbital rail investment; implementation / deletion of Lifetime neighbourhood / Lifetime suburb concept to improve quality of life and reduce the need to travel; and pursuit of a substantially lower population growth trajectory as part of a national rebalancing and/or a reduction in net in-migration associated with Brexit.	The option suggested by Just Space has not been assessed as a spatial option as part of Chapter 1 of the London Plan, as many aspects of this option are incorporated within the Good Growth Policies and other specific policies. The Good Growth Policies were assessed against a range of different options in line with The Environmental Assessment of Plans and Programmes Regulations, 2004.
	The timing of the IIA prevented it from informing the gradual evolution of the Plan. The Scoping Report was issued in February 2017, by which time many of the key ideas had been developed. Discussions were still on going with Just Space in August 2017, by which time the draft Plan must have nearly be finished. It is considered a box-ticking exercise.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004 and follows the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006. The IIA is an iterative process and involved continuous discussions between the IIA reviewers and GLA planning leads. Each stage of the process is outlined in the IIA report: each policy was reviewed against the 24 objectives and recommendations made. The GLA made changes where appropriate and the policies were then reassessed.

Commenter	Comment summary	Response
	According to Government Guidance (Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, OPDM 2005) and the EU directive, public involvement should have occurred at the early formative stages. The IIA is now at Stage D, and no known public consultation occurred at Stages B and C.	The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004. Following the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006, consultation with the public occurs at Stage D of the SEA. Consultation with Statutory Consultees on the Scoping Report is required at Stage A and was undertaken in February 2017.
	The numerous results are complex, yet are presented in a basic, simple format that does not reveal the underlying judgement and assumptions. The analysis is too generalised.	The London Plan is a high level, strategic document which guides boroughs, but leaves scope for the policies to be implemented in an appropriate way, specific to the local area. The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004 and follows the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006. The IIA is an iterative process and involved continuous discussions between the IIA reviewers and GLA planning leads. Each stage of the process is outlined in the IIA report: each policy was reviewed against the 24 objectives and recommendations made. The GLA made changes where appropriate and the policies were then reassessed.
	The guiding questions do not force the interrogation of the policies enough. Separate, high level questions lead to a segmented, not integrated, assessment.	As reported in section 7.1, an objective-led approach was considered more appropriate as it enables an assessment of the extent to which each aspect of the London Plan contributes towards delivery of each objective, as opposed to just meeting prescribed targets. The guiding questions are used to support the assessment process and ensure the environmental, social, health, equality, safety and economic aspects of each objective are considered. The report then brings these assessments together in a fully integrated report.
	The IIA is required to include the preparation of health inequalities strategy. Many of the objectives and guiding questions for each topic do not address each of these despite the attempt to colour code the questions. In particular, equalities impacts are underrepresented. The assessment should be adequately weighted so each guiding question and objective is properly assessed.	The London health inequalities strategy is a separate document and was published for consultation in August 2017. The strategy was included in the assessment of plans, programmes and strategies. Objectives 1, 2 and 4 are directly related to equality and health. Objectives 1-15 and 17-24 all contain guiding questions covering health and/or equality aspects. As reported in section 7.1, an objective-led approach was considered more appropriate as it enables an assessment of the extent to which each aspect of the London Plan contributes towards delivery of each objective, as opposed to just meeting prescribed targets. The objectives were developed in line with the review of relevant plans and programmes, baseline data, consultation with the GLA (Steering Group) and feedback from key stakeholders following a 2016 workshop.
	H10 Redeveloping Existing Housing and Estate Regeneration: biased assessment, showing no negative impacts. There may be some positive impacts, but also negative including: disruption to resident's lives, losses of embodied energy in structures demolished, severing of community networks if/when residents are displaced, interruption of education. There are large amounts of missing information, particularly in the CSIA. The grey colour boxes are not indicated as coding in any part of the documents. There is a lack of information on the housing and tenure of displaced residents, but the relevant objective (Housing supply, quality, choice and affordability) has scored it as significant positive and major positive.	Paragraph 4.10.3 of the supporting policy text sets out that the proposals for estate regeneration schemes should take account of the requirements of the Mayor's Good Practice Guide. The guide supports a fair deal for tenants and leaseholders, including that disruption should be kept to a minimum, and that landlords should support the right to return for residents. It is however acknowledged that estate regeneration can cause disruption to families, local communities and in some instances the continuity of education for children. As a result, clarification has been added to the policy appraisal, and revisions to the scoring matrix have been made. Grey boxes are used into indicate where an objective is not compatible with the assessment, this will be indicated in the final publication of the IIA report.
	The Small Sites Policy in H1 and H2 is intended to apply across very wide areas of London and could produce radically new forms of densification in areas of mainly fragmented land ownership. Until boroughs have produced the proposed design codes and had them approved and adopted there will be a presumption in favour of small site developments which could have severe and largely unregulated consequences which we discuss in comments on H2. In particular we envisage displacement pressures on private tenants and thus disproportionately on weaker groups in society including some ethnic groups. These issues are simply missing,	Whilst H1 housing supply may produce new forms of densification, the Plan also puts much greater emphasis on good quality design. H2 small sites explicitly does not apply to estate regeneration. H2 also states that the GLA will be producing SPG in relation to design typologies for small sites which can be used if the borough has yet to bring forward their own design code. The Policy also allows for neighbourhood forums to bring forward design codes for small sites. Further text however has been added to the appraisal for Policy H1 surrounding the possible disruption and displacement pressures faced by communities as a result of large scale housing development. A recommendation was made to the GLA to explicitly reference the measures in place to protect residents and communities from displacement and disruption This included managing demolition and intensification in a way that does not undermine the security or amenity of residents, and protecting tenancies by ensuring residents have the right to return. Amendments to the scoring matrix have been made in line with these changes.

Commenter	Comment summary	Response
	<p>H2: the assessment has failed to properly evaluate equalities considerations. It does not consider the impact of major intensification through small sites across London. It does not consider any requirement for participation from local communities in planning developments, requirements to replace like for like housing, requirements to protect tenancies or the right to return/remain in a neighbourhood. Concerns regarding the displacement of council housing estates is too generalised. It does not consider the impact of piecemeal redevelopment, site by site, and what safeguards should be put in place to manage issues such as displacement, poor quality private homes, loss of family housing and the impact on vulnerable groups. This is likely to intensify the challenges of regular displacement, poor maintenance and insecurity faced by families in the private-rented sector; displacement of children from schools and neighbourhoods; loss of family housing replaced by smaller more profitable units. Equalities considerations are not present in any discussion of this policy.</p> <p>The IIA notes that it is unknown whether this policy H2 might have negative effects on objectives 1 “To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population”, and 2. “To ensure London has socially integrated communities which are strong, resilient and free of prejudice”.</p> <p>A spurious concern for conflict between Opportunity Areas and small sites for physical space – spurious because OAPFS and local plans will guide development in OAs.</p>	<p>The GLA responses was that H2 was mainly aimed at private residents / landowners and therefore it would be unreasonable in planning terms to expect them to protect communities from displacement. However the GLA highlighted that the Mayor through policy 6.2 of his Housing Strategy provides for improvement in the security of private renters.</p> <p>Policy H2 was assessed against EqIA criteria, as part of the 2017 IIA, including a policy appraisal, scoring against the IIA Framework, and providing recommendations to the GLA. In the 2017 IIA, the scores for objectives 1 and 2 were unknown. This significance criterion is applied to effects where there is insufficient information to make a robust assessments. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other. The recommendations to the GLA outlined the further information required.</p> <p>Following consultation, a number of amendments were made to Policy H2. The policy was reassessed against the IIA Framework to capture these changes. Consultation responses were also taken into account. Changes to the policy included additional wording surrounding urban greening association with minor developments, strengthening the narrative around making the most efficient use of land, opportunities for small sites to accommodate specialist housing for older people, flexibility surrounding family housing and requirements to meet minimum space standards for internal and private outside space.</p> <p>These policy changes have resulted in amendments to the scoring for Objectives 1 and 2 of the EqIA assessment, reflecting the strengthened narratives surrounding equalities considerations. The consultation responses have been reviewed and further text has been added to the appraisal surrounding the possible adverse impacts on communities associated with displacement, demolition and intensification of buildings, and the security of residents. It should however be noted that Policy H2 states that the presumption in favour of small housing developments should not be applied to estate regeneration schemes, larger developments, and mixed-use proposals within the CAZ. These exemptions, along with the support for high quality design, appropriate space standards, provision of family housing and regard for resident privacy, support the protection of amenity for surrounding residents and communities.</p> <p>As part of the policy re-appraisal, a recommendation was made to the GLA to explicitly reference the measures in place to protect residents and communities from displacement. The GLA responses was that H2 was mainly aimed at private residents / landowners and therefore it would be unreasonable in planning terms to expect them to protect communities from displacement. However the GLA highlighted that the Mayor through policy 6.2 of his Housing Strategy provides for improvement in the security of private renters.</p> <p>The GLA also responded that they did not see a conflict between OAs and small sites.</p>
	<p>SD9, Objective 13: Concern regarding the unknown appraisal for the EqIA. The impacts of vital and lifetime neighbourhoods in London, especially for poorer communities, should not be declared unknown. They will be seriously affected by this policy as low value users are displaced for high value, unaffordable housing.</p>	<p>The scoring appraisal for EqIA identifies unknown outcomes for objectives 7, 13 and 21. In this instance, this significance criterion was applied as it was considered there was insufficient information to make a robust assessments.</p> <p>Following consultation, a number of amendments were made to the policy, strengthening the narrative around inclusive and representative growth, and encouraging strategic and local partnerships with a range of community and business forums. The policy supports appropriate strategies tailored to each town centre, and developed with input from relevant stakeholders, including community and amenity groups. It states that town centre strategies should pay particular regard to the social benefits of high streets and town centres, especially the formal and informal networks that support local communities. To clarify these expected positive outcomes of the policy, amendments have been made to the scoring matrix.</p> <p>To reflect the concerns raised in the consultation responses, a recommendation was made to the GLA as part of the policy appraisal. The recommendation was that the policy could reference measures to protect against the displacement of low value uses within town centre developments. The GLA response was that the policy is designed to protect and promote Town Centres uses to ensure their vitality and vibrancy.</p>
	<p>DF1 Delivery of the Plan and Planning Obligations: the IIA does not mention a funding gap or considers boroughs having the capacity to decide how to deal with the information presented in Viability Assessments, or how the community is excluded when boroughs are encouraged to take into account the levy.</p>	<p>Further wording surrounding the potential challenges and uncertainties for both local authorities and communities has been added to the appraisal, and amendments to the scoring matrix have been made accordingly.</p>
	<p>There is lack of definite consequences from the IIA. The IIA process should set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimise negative impacts, optimise positive ones and compensate for losses as it progresses. This has not been done adequately.</p>	<p>The approach adopted in the IIA follows the stages of SEA in line with The Environmental Assessment of Plans and Programmes Regulations, 2004 and follows the Government guidance A Practical Guide to the Strategic Environmental Assessment Directive, 2006.</p>

Commenter	Comment summary	Response
	<p>OPDM Practical Guide, para 5.A.2 and Appendix 3 state that other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups should be involved at Stage A.</p> <p>Fig 1 – The SEA Directive’s Requirements on Consultation - Stages B, D</p> <ul style="list-style-type: none"> • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). [p10 ODPM Practical Guide] <p>Appendix 6 developing and assessing alternatives.</p> <p>“Stakeholders may usefully be involved in the generation and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process. The alternatives considered throughout the process must be documented and reasons given on why they are or are not taken forward” [p. 69 ODPM Practical Guidance].</p>	<p>The London Plan is a high level, strategic document and boroughs will implement it in different ways, depending on the local requirements. All recommendations have been considered by the GLA and either the Policy text was amended, or a justification provided by the GLA as to why no changes were made. The GLA is not required to take all the recommendations from the IIA into account, the IIA recommendations are to inform the decision making process and are one of a number of considerations.</p> <p>To inform the scoping stage of the IIA, not only were the 3 statutory organisations involved there were over 20 other business, community and other stakeholders – of which Just Space was one (who represent over 100 grass route resident and community organisations).</p> <p>Just Space were involved at Stage B, along with other stakeholders, which complies with the SEA guidance</p> <p>In developing the alternative spatial options for growth over the Plan period, the GLA undertook a comprehensive review of baseline information, gathered as part of the Scoping Report. A number of key stakeholders were involved in the development and refinement of the spatial options, including Just Space, who commented on the draft options presented by the GLA. A spatial options workshop took place in August 2017, to review and finalise the reasonable alternatives with policy officers from across a number of disciplines within the GLA, and consultants from Arup.</p> <p>Following the finalisation of the spatial options, they were assessed as part of the appraisal of strategic options in the 2017 IIA, using the IIA framework to clearly identify potential impacts and cumulative outcomes associated with each policy option. The assessment of each spatial options sets out the potential benefits and shortfalls of each alternative, documenting the rationale behind why the preferred option was chosen.</p>
Lands Improvement Holdings	<p>Recognises the ambitious nature of the document, but in places it should be made clearer and the scope extended. It is not possible to conclude that the draft London Plan is based on a justified evidence base that represents the most appropriate strategy and is considered against reasonable alternatives.</p> <p>The IIA is not supported by a Green Belt Review and therefore conclusions on the relative value of Green Belt are not justified. The IIA is too narrow to evaluate the benefits of limited Green Belt release in London and it should be considered as an alternative, particularly where boundaries have not been reviewed for over 80 years.</p> <p>Policy H1: the IIA recommended more information regarding affordable homes, but the GLA response states that this is covered in H5, which is not the case, and this recommendation should be reconsidered.</p> <p>Policy H3: a more comprehensive monitoring and review process was recommended by the IIA, but the GLA did not include this in the draft policy, and this recommendation should be reconsidered.</p> <p>The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of providing affordable housing through limited Green Belt release.</p>	<p>A baseline assessment was undertaken as part of the Scoping Report which was published in February 2017. Strategic alternatives have been assessed under Section 8 of the IIA report, following the SEA guidance. All policies have been assessed by competent experts, and all recommendations were either accepted by the GLA and the policy updated, or a justification for no changes was provided.</p> <p>The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered by the GLA to be the preferred option.</p> <p>The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and a greater emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.</p> <p>The GLA reconfirmed that the Plan should be read as a whole and that policies H5 to H8 address issues relating to affordable housing</p> <p>The GLA confirmed that it collects starts and completions data for all the London boroughs which is updated monthly by the boroughs dependant on local resources.</p> <p>The limited release of Green Belt to accommodate long term housing need was considered as part of the alternative spatial options within the IIA. Option 4 of GG2 Making the best use of land policy outlines the proposal of the Current London Plan and selective Green Belt release. A full policy appraisal against the IIA Framework was undertaken on this option. The assessment noted that Green belt land is carefully protected,</p>

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		<p>and the legal challenges surrounding its release are likely to take a considerable amount of time. The release of this land, therefore, would not be immediate and the delivery of infrastructure would take a long time to surface. This could pose challenges in relation to meeting immediate housing needs across the city.</p> <p>The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered to be the preferred option.</p> <p>The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and an emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.</p>
	<p>The IIA does not recognise the conflict between Policy G2 and others in the plan, for example H1. In the absence of a Green Belt Review, Policy G2 is not supported by evidence and therefore not justified. The appraisal fails to identify negative elements of Green Belt protection, including failure to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt, resulting in unsustainable community patterns, and increased pressure to develop on urban open space and employment sites to meet housing need.</p>	<p>The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered to be the preferred option.</p> <p>The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and an emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.</p>
	<p>The selective Green Belt Release option should be given further consideration as part of the London Plan's preferred sustainable intensification option. The evidence does not support the assessment's conclusions that Green Belt release would severely damage the environment and impact health and social benefits.</p>	<p>The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered to be the preferred option.</p> <p>The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and an emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.</p>
Historic England	<p>The relevant plans, programmes, strategies and objectives should be updated and include the Heritage Statement 2017 (DCLG); the Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (revised December 2017); and Historic England Advice Note 4: Tall Buildings, December 2015; the threats to Westminster WHS ICOMOS/ICCRM 2017; Keep it London: Putting heritage at the heart of London's future, Historic England, December 2016; Characterisation of London's Historic Environment, Land Use Consultants, August 2016; London's Local Character and Density, Allies and Morrison, September 2016; London Plan Archaeology Topic Paper: Delivering better, faster and focused public benefits, Historic England/ALGAO, March 2017; Translating Good Growth for the Historic Environment, Historic England, April 2017; Risky Business? – Investing in Heritage at Risk, Lichfields, January 2018; Historic England's responses to the Draft Environment, Transport, Housing and Health Inequalities strategies.</p> <p>GG1: Preferred option has no relationship with the historic environment. This is in contrast to Option 3. Good placemaking recognises, and builds from, the contribution heritage makes to identity and social cohesion. This Policy and GG2 should undergo review based on the changes to the text Historic England have recommended to the GLA.</p> <p>SD1 Opportunity areas: this Policy should be reviewed and amended to reflect the need for assessment of heritage assets and their settings within and adjoining OAs. Additionally Historic England would like to see how alternative options for new OAs were appraised in the IIA- the Plan suggested 6 new OAs.</p> <p>D8 Tall Buildings: the initial appraisal does not consider the potential impacts on the settings of heritage assets, which has been identified as an issue elsewhere in the IIA. The Historic England Advice Note 4: Tall Buildings and GPA Note 3 The Setting of Heritage Assets are relevant here.</p>	<p>The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include these suggested documents.</p> <p>The policy has been re-reviewed with the inclusion of Historic England's recommended text, which recognises the contribution of the historic environment to good growth.</p> <p>The policy has been re-reviewed with the inclusion of Historic England's recommended text, which recognises the role of heritage in placemaking, and the need to consider heritage assets within Opportunity Areas, and work with surrounding authorities on cross-boundary issues.</p> <p>OAs were assessed as part of the spatial options in Policy GG2 Making the best use of land. The alternative spatial options considered OAs as a policy response of meeting London's growth. The identification of individual OAs however is driven by resources and political commitment at the local level. They are not mutually exclusive of each other. All of the alternative land use options assessed with Policy GG2 included residential-led growth within the OAs to meet long term housing needs.</p> <p>Part C (d) of the policy supports that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing</p>

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		justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.
	H2 Small Sites: disagree with the neutral impact for the historic environment. The implications of the policy on heritage assets and the conflicts with legislative duties and national policy are not referred to in the assessment. This assessment should be reviewed and it should consider the proposed amendments	The policy has been re-reviewed with the inclusion of Historic England's recommended text, which sets out that boroughs are encouraged to explore opportunities for small housing developments in conservation areas where these will complement and enhance the area. The text supports well-designed new housing in making a positive contribution to the special character of conservation areas. This also applies to small sites in the setting of other heritage assets such as listed buildings. Amendments were made to the scoring matrix, in line with these policy changes.
	G1 Green infrastructure: the assessment recognises the importance of heritage assets within London's green and open spaces but could go further to identify the strong relationship between green space and cultural heritage, which is made very clear in the Government's recently published Heritage Statement and the 25 year Environment Plan. This would bring it in line with the Government's statements.	Further text surrounding the strong relationship between green space and cultural heritage has been incorporated into the policy appraisal. No further amendments have been made to the scoring matrix as a result of this change.
	S10 Aggregates: the appraisal and table should consider the potential impact on archaeological remains.	Further text surrounding the potentially adverse impacts of extracting and transporting aggregates on archaeological remains has been incorporated into the appraisal. Amendments to the scoring matrix have been made as a result of this change.
	SI14 Waterways- strategic role: the strategic value of the Thames to how the capital's heritage assets are experienced is immeasurable. The assessment should address this gap in the policy coverage and make recommendations to strengthen accordingly.	Paragraph 9.14.2 of the policy recognises the waterways as multifunctional assets, including the role they play as a unique backdrop for important heritage sites, landscapes, views, cultural and community activities. Further text has been added to the policy appraisal to emphasis this relationship, and amendments to the scoring matrix have also been made.
Jessica Ferm Individual	Policy E5: the Policy has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses (the impact on places of worship serving diverse ethnic and religious groups is likely to be notable). Has this been subject to an equalities impact assessment? The Policy should be stronger in seeking to retain SIL where possible. This was clear in previous iterations, but it now reads that all SIL is available for redevelopment. There has not been enough consideration for the accommodation of London's various non-residential uses.	Part D of the policy states that Development proposals for uses in SILs other than those set out in part C (including residential development, retail, places of worship, leisure and assembly uses) should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. The potential impacts of this part of the policy have been added to the appraisal, and the scoring matrix has been amended accordingly. The EqIA is part of the IIA.
Legal and General Capital	The IIA does not recognise the conflict between Policy G2 and others in the plan, for example H1. In the absence of a Green Belt Review, Policy G2 is not supported by evidence and therefore not justified. The appraisal fails to identify negative elements of Green Belt protection, including failure to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt, resulting in unsustainable community patterns, and increased pressure to develop on urban open space and employment sites to meet housing need.	The assessment has been amended to recognise that the social and environmental are inconclusive without borough-level Green Belt assessments. However, sustainable intensification is still considered to be the preferred option. The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and an emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.
Police Crime Prevention Initiatives Limited	Outlines the large amount of legislation, policy and guidance that addresses crime including the National Planning Policy Framework, National Planning Policy Guidance, Crime and Disorder Act 2017 and Modern Crime Prevention Strategy.	The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include those suggested documents not already in the report.
Henrietta Doyle Campaign Group: Inclusion London	Recommend that there is a detailed EqIA to ensure the impact of the London Plan on deaf and disabled people can be seen clearly.	The IIA is a fully integrated assessment which has considered equalities issues in line with the Equality Act 2010, considering protected characteristics under Part 2, Chapter 1 of the Act.
Stonewall housing	The Plan has failed to address LGBT people's housing aspirations and the need for non-commercial community spaces, resulting in continued negative impacts on the community.	The IIA has considered the needs of groups with protected characteristics, in line with the Equality Act 2010, as part of the policy assessments. The needs of LGBT communities are specifically referenced within policies HC5 and HC7.
Dylon 2	The IIA does not assess any alternative housing targets, including within the strategic policy options. The housing target is c65,000 pa has not been justified. Additionally, the assessment of Policy H1 has identified significant	The housing target is informed by the Mayor's London-wide Strategic Housing Market Assessment (SHMA), and Strategic Housing Land Availability Assessment (SHLAA). The need for 66,000 additional homes per

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	positive, long term benefits against the housing objective. However there is concern that the housing targets could result in shortcomings and the new London Plan not effectively addressing London's housing problems.	<p>year is based on capacity of potential sites based on a range of policy assumptions. Further detail surrounding the assumptions informing the London-wide housing target is set out in the Mayor's SHMA and SHLAA.</p> <p>The IIA assesses alternative spatial options for meeting London's long-term housing need. In the alternative spatial options, included in the current plan approach a lower housing target as it was based on policy assumptions with the current London Plan.</p> <p>Policy H1 was assessed as part of the 2017 IIA, in line with the IIA Framework and methodology. The policy supports the delivery of a range of housing and mixed-use development to meet ambitious housing targets across the London Strategic Housing Market Area. The policy emphasises on exploring opportunities to optimise suitable and available brownfield sites, and overcoming constraints to development. For this reason, the policy was assessed as achieving long term benefits against the housing objective.</p> <p>Additional policies throughout the Plan support the intensification of housing delivery and optimisation of available land, including Policy H2 Small Sites. This will help to overcoming challenges and make the best use of land to meet housing needs across London.</p>
Natural England	Welcome the inclusion of Objective 20, but believe a number of policies, noting SD1 and H1 in particular, have been marked as n/a when there is an effect, and this should be reviewed.	Policies SD1 and H1 have been reassessed to consider Objective 20 of the assessment. The potential impacts against this objective have been added to the policy appraisal, and the scoring matrix has been amended accordingly.
LB Hillingdon	Policy H2 should recognise the impact smaller sites would have on flood risk and would limit one of the key drivers within the London Plan, to secure long term, sustainably designed homes which use green infrastructure. Small sites are below thresholds for current constraints on development to be considered.	<p>Further text surrounding the potential impacts of small sites on flood risk have been added to the policy appraisal, and amendments to the scoring matrix have been made as a result of this change. A recommendation has been made to the GLA that flood risk is referenced within the policy.</p> <p>The GLA response was that if there were specific issues such as high flood risk in an area, then local design codes could measures to minimise these risks,</p>
Environment Agency	Further assessment of the cross-boundary impacts between London and the wider South East would be appropriate. Within the Context Review there is limited evidence that plans and programmes of counties and local authorities surrounding London have been accounted for. However, the Environment Agency appreciates the reference to the Thames River Basin Management Plan and Thames Estuary 2100 Plan.	The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include additional plans where appropriate.
	Chapter 3 IIA Methodology and approach: in planning for water, it should be noted that water companies will take a strategic approach to the city-region under the current Price Review 19 process. Their plans to cover this (Assess Management Plans) are being drafted to cover the period 2018-2024.	The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include these plans where relevant.
	Chapter 3, IIA Methodology and approach: suggest the text is expanded to justify the geographic scope. For example, some of London's waste is transported into the Wider South East, the Midlands and Avonmouth.	The final report will be amended so that the geographical scope is extended however the text will caveat that the Mayor does not have planning powers outside the GLA boundary.
	Chapter 4, Review of relevant plans, programmes, strategies and object, Table 9: Water Resource and Quality: note that the Thames RBMP was updated in 2016.	The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include this amendment.
	Chapter 4, Review of relevant plans, programmes, strategies and object, Page 16: the Thames Catchment Management Plan 2009 is a non-statutory plan. The Thames River Basin District Flood Risk Management Plan 2016, should be referenced as the relevant statutory plan.	The final IIA Report will include an updated assessment of plans, programmes and strategic objectives and will include these suggested documents.
	Chapter 5, Baseline Section 5.16: Table 11 should be checked against the Thames RBMP 2016.	This will be checked for the final IIA Report.
	Chapter 5, Baseline, Section 5.21: the figures should be reviewed as they are from 2012 and now out of date.	This will be updated in the final IIA Report.
	Chapter 6, Key sustainability Issues: water resources and quality 'key issues'. The text should be amended to say "London's waterbodies and groundwater".	This will be included in the final IIA Report.
	Chapter 7, IIA Framework: the Scoping Report discussed opportunities in the London Plan to focus on prevention and remediation of soil and contamination and to adopt a co-ordinated approach to bring derelict land with high abnormal costs back into use. However this has not followed thorough to the Draft London Plan (Section 5.22, p137 of the Scoping Report). We would expect to see assessment against the key issues and questions which the IIA identifies, leading to IIA recommendations for the draft London Plan, and to a GLA response to those recommendations.	Objective 22 of the IIA Framework covers geology, ground contamination and soil. Alongside this objective are a number of guiding questions which ensured that during the appraisal process, environmental, social, health and economic issues are all considered.
	GG2: agree with the IIA recommendations, and would expect to see the GLA response to this, with reference perhaps made to the draft Regional Flood Risk Assessment.	Policy SI 12 refers to the Regional Flood Risk.
	GG6: would expect to see the GLA response to recommendations regarding retrofitting. Retrofitting could be facilitated by new development.	The GLA responded that the Mayor's Environment Strategy addressed issues of retrofitting.

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	D1 and D2: the GLA response should be reviewed. The GLA should commit to updating current London Plan supplementary planning guidance on sustainable design.	The GLA confirmed that there are a number of policies in which supplementary guidance is being prepared where these were considered appropriate.
	D7: the GLA should reconsider the IIA recommendations and draw out the links and mutual support between public realm and other relevant policies.	The GLA reconfirmed that the Plan should be read as a whole and therefore there is no need for cross reference across the Plan.
	G5 'Urban greening'. We note the IIA's recommendations in regards to including more detail in the policy on the Urban Greening Factor, and the GLA's positive response to this. In our view this is the correct approach.	Noted.
	G6 'Biodiversity and access to nature'. We agree with the GLA's response to the IIA recommendations, but suggest that further consideration be given to the policy's ability to deliver biodiversity net gain. Natural England's response refers to this.	The Policy was reviewed to include a reference to net biodiversity gain.
	G9 'Geodiversity'. We note the 'neutral' and 'unknown' effects assessed against IIA Objective 22 (to conserve London's geo-diversity and protect soils from development and over intensive use). In the circumstances, we suggest that the GLA responds by revising Policy G9, to support borough's local plans.	Borough local plans have to be in general conformity with the London Plan not the otherway round.
	S15: concerns regarding the GLA response to the IIA recommendation to consider tributary pollution as a threat.	The supporting text refers to development proposals being designed to ensure that the potential for misconnections (which contributes to pollution of tributary) is eliminated. The means for this will vary case by case.
	S17 Reducing Waste: a number of unknowns in the assessment. The GLA could commit to developing Supplementary Planning Guidance to provide more details.	The scoring appraisal identifies unknown outcomes for a number of objectives. This is to flag that they are important considerations, however the extent to which they are achieved will be at the discretion of individual local authorities. The supporting text already refers to a commitment to provide guidance on circular economy statements. The GLA also confirm that the Mayor's Environment Strategy provides more details on reducing waste.
	S18 'Waste capacity and net waste self-sufficiency'. Given the number of 'unknown' impacts of Policy S18 recorded in Table 128, it may be helpful for the GLA to indicate that they would consider developing Supplementary Planning Guidance, to provide more details on how the Mayor would expect this policy to be addressed.	The GLA confirmed that there are a number of policies in which supplementary guidance is being prepared where these were considered appropriate.
	S19 Safeguarded Waste sites: there are number of unknowns and neutral impacts in this assessment, despite the GLAs response to recommendations about the strategic location of waste sites. There are tensions in some boroughs regarding housing targets and waste apportionments. A strategic approach to waste for an Opportunity Area 'cluster' may be more effective.	The scoring appraisal identifies unknown outcomes for a number of objectives. This is to flag that they are important considerations, however the extent to which they are achieved will be at the discretion of individual local authorities. The GLA confirmed that it is the boroughs that are responsible for waste plans and are joint waste partnerships which plan for waste across borough boundaries. Waste sites will be allocated as part of that process.
	S12 Flood Risk Management: although the Environment Agency understands the GLA response that water management is covered by many policies, the GLA could support an integrated water management approach within the plan.	Policy SI 5 Water Infrastructure has been reviewed to include a new clause in relation to integrated water management strategies informing development proposals in flood risk constrained areas.
	S114 Waterways strategic role: there are a number of unknown and neutral effects against the IIA but these could be more positive.	The scoring appraisal identifies unknown outcomes for a number of objectives. This is to flag that they are important considerations, however the extent to which they are achieved will be at the discretion of individual local authorities.
	DF1: the appraisal does not fully address environmental impacts. The policy should include in its priorities 'environmental infrastructure, such as flood risk management, in identifying funding priorities for planning applicants and decision makers. The IIA should assess whether the Policy supports the environmental objectives.	Paragraph 11.1.45 of the policy sets out the need for sufficient green infrastructure, including sustainable drainage systems. The policy is also clear that once the Plan is adopted, as it has been viability tested, the policies within the Plan that have specific requirements should be met. Paragraph Further wording surrounding the potential environmental outcomes of the policy have been added to the appraisal, and amendments to the scoring matrix have been made accordingly.
Royal Borough of Kingston	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. It is clear	In developing the alternative spatial options for growth over the Plan period, the GLA undertook a comprehensive review of baseline information, gathered as part of the Scoping Report. This process identified the key sustainability issues facing London, and was used to inform a range of alternative spatial options. A number of key stakeholders were involved in the development and refinement of the spatial

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	that communities place immense value on their Green Belt and Metropolitan Open Land. However, they also value their suburbs, gardens and town centres.	<p>options, including Just Space, who commented on the draft options presented by the GLA. A spatial options workshop took place in August 2017, to review and finalise the reasonable alternatives with policy officers from across a number of disciplines within the GLA, and consultants from Arup.</p> <p>All spatial options were assessed in line with the IIA methodology and Framework, to clearly identify potential impacts and cumulative outcomes associated with each policy option. The assessment of each spatial options sets out the potential benefits and shortfalls of each alternative, documenting the rationale behind why the preferred option was chosen.</p> <p>The preferred spatial option (Option 2) was considered a more sustainable and efficient use of land, and protects the amenity and range of uses that the Green Belt currently supports. A range of policies throughout the London Plan serve to protect and enhance town centres, public realm, open space and protect private open space from inappropriate development.</p>
Royal Borough of Kingston	RBK notes that the IIA rejects the option of a polycentric city. Instead the London Plan seeks to strengthen the economic offer of central parts of London without looking to increase employment capacity across London alongside significant increases in housing. Without explicit London Plan policy support, RBK will struggle to deliver new local employment floorspace to counterbalance the housing growth, increasing pressure on transport networks, reducing quality of life and failing to meet the needs of local businesses and potential businesses.	<p>A number of reasonable alternatives were assessed as part of Policy GG2 to identify the most appropriate options for London's growth, and meeting long-term housing needs over the Plan-period. Within Policy GG2, Option 3: Polycentric Approach, considers a polycentric approach to land use, dispersing economic growth evenly across town centres, and in sustainable locations within inner and outer London. Option 3 underwent a full policy appraisal, in line with the IIA methodology and Framework. The policy appraisal identified</p> <p>The preferred option (Option 2) draws together the desirable characteristics across a number of spatial options, including many of the objectives of option 3. It was noted that dispersed economic growth could limit London's competitiveness and could undermine the viability of more traditional economics, such as CAZ or the Northern Isle of Dogs, which contribute significantly to the London economy. The preferred still supports the needs of local economies, alongside more traditional economic sites. The London Plan includes a range of policies to support local economic growth, the vitality of town centres and appropriate provision and protection of employment space.</p>
Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Partnership	<p>The London Plan should fully close the gap between the number of homes needed and the supply of land to accommodate them by further exploring and exhausting all reasonable options for accommodating housing growth within London. One such option is a comprehensive and fully justified review of the Green Belt within London.</p> <p>The evidence does not appear to support the IIA recommendation 'that an alternative to Green Belt release is considered due to the severe environmental damage it could have' (our emphasis) or the GLA response to this element of the IIA which rejects selective Green Belt release in order to protect the environmental and social benefits (for example, activities that support health and well-being) of the Green Belt. The IIA itself clearly demonstrates that selective release of Green Belt in London has the potential to deliver sustainable growth. It should therefore be given further consideration as part of the London Plan's preferred 'Sustainable Intensification' option.</p>	<p>A number of reasonable alternatives were assessed as part of Policy GG2 to identify the most appropriate options for London's growth, and meeting long-term housing needs over the Plan-period. Within Policy GG2, Option 4: Current London Plan and Selective Green Belt Release, considers the limited release of Green Belt in sustainable locations, to accommodate identified housing and employment needs. This option underwent a full appraisal using the IIA methodology and framework. The policy appraisal identified that Green Belt land is carefully protected, and the legal challenges surrounding its release are likely to take a considerable amount of time to overcome. The release of this land would therefore not be immediate, and the delivery of infrastructure would take a long time surface, and could pose challenges in relation to meeting immediate housing needs across the city.</p> <p>The preferred option (Option 2: Sustainable Intensification) also considers the use of small sites to deliver housing at a quicker rate across London, whilst also supporting smaller businesses. This was considered a more sustainable and efficient use of land, and protects the amenity and range of uses that the Green Belt currently supports. Sustainable intensification uses small sites, co-location, town centres, opportunity areas and an emphasis on publically owned land within London to meet London's development needs without Green Belt Release. The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF.</p> <p>The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development.</p>
London Borough of Redbridge	Various options to help meet the borough's minimum housing target to help close the gap were looked at as part of Redbridge's Local Plan sustainability appraisal. One of the options considered was higher intensification and no green belt release which sought to exhaust all densification opportunities and avoid removing land from the green belt. It is considered that this option essentially reflects the Mayor's proposal in the draft London Plan. Whilst it performed well against housing objectives, this option showed a negative impact upon townscape, character and the ability to deliver much needed infrastructure. The Council's preferred strategy, densification in appropriate locations alongside managed release of green belt, was considered to be a more balanced approach.	<p>A number of reasonable alternatives were assessed as part of Policy GG2 to identify the most appropriate options for London's growth over the Plan period. Option 4 (limited green belt release) was considered, and underwent a full appraisal as part of the IIA. The policy appraisal identified that Green Belt land is carefully protected, and the legal challenges surrounding its release are likely to take a considerable amount of time to overcome. The release of this land would therefore not be immediate, and the delivery of infrastructure would take a long time surface, and could pose challenges in relation to meeting immediate housing needs across the city.</p>

Commenter	Comment summary	Response
		<p>The preferred option (Option 2: Sustainable Intensification) considers the use of small sites to deliver housing at a quicker rate across London. This was considered a more sustainable and efficient use of land, and protects the amenity and range of uses that the Green Belt currently supports. The preferred option incorporates many of the desirable characteristics from the other options, including Option 4.</p> <p>The London Plan has a range of policies surrounding appropriate and sufficient infrastructure delivery, and protecting and enhancing heritage assets. These policies will help to ensure growth is balanced, sustainable and inclusive.</p>
Daniel Willis	The Mayor should implement the Equality Act's socio-economic duty in all decision-making processes related to economic activity; and for the Plan to include a commitment to ensure the representation of diverse industrial sectors, including businesses owned by ethnic minorities and migrants, on GLA decision-making boards.	<p>The IIA assessed all policies within the London Plan against health, equalities, environmental, equalities and community safety objectives as part of the IIA Framework. The IIA framework includes an equalities impact assessment.</p> <p>Policies throughout the Plan seek to strengthen community integration, inclusivity, and promote the representation of equalities groups. This includes promoting economic, employment and skills opportunities for all groups within London.</p>
Inclusion London	A detailed Equalities Impact Assessment should be undertaken on the London Plan	The IIA assessed all policies within the London Plan against health, equalities, environmental, equalities and community safety objectives as part of the IIA Framework. The IIA framework includes an equalities impact assessment.
Kennington Oval and Vauxhall Forum (KOVF)	We do not think the IIA process has been adequately conducted, being deficient in public consultation at the crucial options stage, leaving only officially sanctioned options to be appraised and subsequently consulted on. This is inconsistent with UK guidelines laid down by the courts for sound consultation. Furthermore, we do not consider the IIA has adequately met the requirement of Regulation 12(2)(b) and Schedule 2 para 8 of the Environment Assessment Regulations (SI 2004 No 1633) to outline the reasons for selecting the alternatives dealt with, and evaluate their effects on the environment. We have in mind particularly the population growth assumptions embodied in the SHMA which has major implications for the housing targets and their environmental impact.	<p>A number of reasonable alternatives were assessed as part of Policy GG2 to identify the most appropriate options for London's growth, and meeting long-term housing needs over the Plan-period.</p> <p>In developing the alternative spatial options for growth, the GLA undertook a comprehensive review of baseline information, gathered as part of the Scoping Report. A number of key stakeholders were involved in the development and refinement of the spatial options who commented on the draft options presented by the GLA. A spatial options workshop took place in August 2017, to review and finalise the reasonable alternatives with policy officers from across a number of disciplines within the GLA, and consultants from Arup.</p> <p>All of the spatial options underwent a full assessment in line with IIA methodology and framework, including assessing against environmental impacts. These were weighed up against a range of other factors (relating to health, community safety and equalities) as part of the policy appraisal. The assessment of each spatial options sets out the potential benefits and shortfalls of each alternative, documenting the rationale behind why the preferred option was chosen.</p> <p>The preferred option incorporates many of the desirable characteristics from the other options, and was considered the most sustainable and efficient use of land to meet London's housing needs.</p>

3 Review of changes

Following consultation on the Draft New London Plan, a number of amendments were made to the Plan. Appendix A contains a full list of amendments and a review of whether these changes were considered significant and required reassessment under the IIA. Any changes to the Policy text which were considered significant have been reassessed in Section 0. Similarly, the consultation responses have helped to shape some reappraisals, which have also been incorporated into the reassessment stage.

In the IIA Report, the Good Growth policies (Chapter 2 of the Plan) had a range of options which were assessed. Based on consultation, Option 4 of the final New London Plan has undergone reassessment in this report, however this option does not form part of the final New London Plan as it is not the preferred option.

The specific policies which have undergone reassessment are:

- Option 4 of GG2 Making the best use of land: *Current London Plan and selective green belt release*
- GG1 Building strong and inclusive communities
- SD1 Opportunity areas
- SD2 Collaboration in the Wider South East
- SD4 The Central Activities Zones (CAZ)
- SD6 Town centres- Strategy
- SD8 Town centres – Development principles
- SD9 Town centres – Local partnerships and implementation
- SD10 Strategic and local regeneration
- D2 Delivering good design
- D3 Inclusive design
- D4 Housing quality and standards
- D5 Accessible housing
- D7 Public Realm
- H1 Increasing housing supply
- H2 Small sites
- H6 Threshold approach to applications
- H7 Affordable housing tenure
- H9 Vacant building credit
- H10 Redeveloping existing housing and estate regeneration
- H11 Ensuring the best use of stock
- H14 Supported and specialised accommodation
- H16 Gypsy and traveller accommodation
- S1 Developing London’s social infrastructure
- S6 Public toilets
- S7 Burial space
- E5 Strategic Industrial Locations (SIL)
- E10 Visitor infrastructure
- E11 Skills and opportunities for all
- HC2 World Heritage Sites
- HC5 Supporting London’s creative and cultural industry
- HC6 Supporting the night-time economy
- G1 Green Infrastructure
- G3 Metropolitan open land
- G6 Biodiversity and access to nature
- G8 Food Growing
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI1 Improving air quality
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI10 Aggregates
- SI12 Flood risk management
- SI13 Sustainable drainage
- SI14 Waterways- strategic role
- SI16 Water use and enjoyment
- SI17 Protecting London’s waterways
- T3 Transport capacity, connectivity and safeguarding
- T5 Cycle parking
- T6 Car parking
- T6.1 Residential parking
- T6.3 Retail parking

- T7 Freight and servicing
- T8 Aviation
- DF1 Delivery of the plan and planning obligations

4 Revised policy assessments

The following section covers the revised policy assessments. An initial screening exercise was undertaken on all policy changes provided by the GLA, to distinguish between minor wording amendments and substantial changes to the policy content. Where changes to the policy were considered to alter the meaning, direction or outcome of the policy, the policy has been reassessed in line with the methodology and IIA Framework used to undertake the 2017 IIA. Additional narrative summarising the changes and potential impacts has been added to the policy appraisal, and the corresponding matrix has been updated where relevant. Any changes to the matrix are shown in red and bold. In some instances, policy changes warranted additional narrative within the addendum report, however did not result in changes to the scoring matrices. In addition to policy changes, the revised assessments have been informed by the consultation responses specific to the IIA.

4.1 Spatial Option- *Current London Plan and selective green belt release (Option 4 of Making Best Use of Land)*

Option description

This option seeks to continue following those objectives outlined in the current London Plan, with the addition of limited green belt release in sustainable locations, to accommodate identified housing and employment needs over the Plan period. The option supports the location of economic growth in the Central Activity Zone (CAZ), Isle of Dogs, town centres and strategic outer London. Housing growth would be primarily located in Opportunity Areas, intensification areas and town centres, along with additional green belt release to support new local and neighbourhood centres. This option supports the managed release of industrial land, in line with agreed benchmarks.

Appraisal and recommendations

This option supports high density housing delivery in town centres, Opportunity Areas and intensification areas, supported by high quality transport infrastructure. To meet a range of local housing needs, and to accommodate long term growth, limited green belt release would be supported in sustainable locations. This release would be determined through the Local Plan process, and would prioritise previously developed and low performing green belt, along with growth around commuter hubs.

The sustainable release of green belt land can bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline.

This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London.

Environmentally, the selective release of green belt land could have adverse impacts on species and habitats, and could set precedent for further green belt release, putting further natural capital at risk. Green belt land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of non-permeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available to act as a carbon sink for emissions.

Green belt land is also carefully protected, and the legal challenges surrounding its release are likely to take a considerable amount of time. The release of this land, therefore, would not be immediate and the delivery of infrastructure would take a long time to surface. This could pose challenges in relation to meeting immediate housing needs across the city.

Recommendations

It was recommended that an alternative to green belt release is considered due to the severe environmental damage it could have. High densities and the co-location of industry and residential units could be an alternative to this.

GLA response

Option 2, Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated, including a focus on the CAZ, Isle of Dogs and town centres. Option 2 also additionally highlights the importance of Old Oak Common and Stratford. Housing growth is similarly residential-led in Opportunity Areas, but Option 2 also considers the use of small sites to deliver housing at a quicker rate across London, with the added benefit of supporting smaller businesses. Option 2 also goes further to support the co-location of complementary residential and industrial land use, increasing density and the efficiency of land use. This option does not support selective green belt release but instead ensures the protection of green belt land, protecting the environmental and social benefits green belt provides. The use of small sites and co-location are ways to use land more efficiently to reduce the need to green belt release.

Post-consultation amendments

This spatial option has been updated based on consultation responses. Five spatial options were assessed as part of the IIA for GG2 'Making the best use of land'. Option 2 (Sustainable Intensification) is the preferred option and is therefore included in the New London Plan.

The consultation responses raised concerns that the social and environmental benefits of Green Belt release cannot be assessed without an accompanying London-wide Green Belt assessment. The GLA does not possess the necessary powers to amend Green Belt boundaries through the London Plan; Green Belt boundaries may only be designated or amended at the Borough-level. Paragraph 83 of the National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered "in exceptional circumstances, through the preparation or review of the Local Plan". The NPPF also emphasises the "great importance" attached to the Green Belt by government with paragraph 79 stating that the fundamental aim of the Green Belt is to "prevent urban sprawl by keeping land permanently open". The Draft Revised NPPF (March 2018), which sets out Government policy, highlights the need to "[examine] fully all other reasonable options" before seeking to amend Green Belt boundaries, in particular:

- Maximising use of brownfield and underutilised land;
- Optimising the density of development, particularly in town and city centres.

The sustainable intensification option is therefore still considered the most appropriate option; as detailed in Section 8.1.2 of the IIA Report, co-location, small sites, town centres, opportunity areas and an emphasis on publically owned land within London can meet the development needs of London without the need to release Green Belt land. This preferred option does not prevent London boroughs from undertaking Green Belt assessments to understand the performance of Green Belt land against the NPPF purposes, but rather emphasises the GLA's preference towards intensification and the long term protection of Green Belt in line with both the adopted and Draft Revised NPPF. However, it is recognised that the social and environmental appraisals are inconclusive without borough-level Green Belt assessment, and **Error! Reference source not found.** has been amended to reflect this.

Table 2: Spatial Option: *Current London Plan and selective green belt release* (Option 4 of Making Best Use of Land)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	+	+	n/a	n/a	?	n/a	n/a	n/a	n/a	?	?	?/-	+/?	n/a	n/a
Medium Term						+?	+/?		+	+	+	n/a	n/a	?	n/a	n/a	n/a	n/a	?	?	?/-	+/?	n/a	n/a
Long Term						+/?	?		+	+	?	n/a	n/a	?	n/a	n/a	n/a	n/a	?	?	?/-	+/?	n/a	n/a
Direct / Indirect						D	I/D		I/D	I/D	D	n/a	n/a	D	n/a	n/a	n/a	n/a	D	D	D	I/D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/GL	L	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a	L	L	L/GL	L/GL	n/a	n/a
EQIA																								
Short Term	?	?	?	n/a	+	+	n/a	+	n/a	+	+	n/a	?/-	?	n/a		n/a	n/a	?	?	?/-	n/a	n/a	n/a
Medium Term	?	?	?	n/a	+	+	n/a	+	n/a	+	+	n/a	?/-	?	n/a		n/a	n/a	?	?	?/-	n/a	n/a	n/a
Long Term	?	?	?	n/a	+	+	n/a	+	n/a	+	?	n/a	?/-	?	n/a		n/a	n/a	?	?	?/-	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	D	n/a	I/D	n/a	I/D	D	n/a	I/D	I	n/a		n/a	n/a	D	D	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	T/P	P	n/a	T/P	T/P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L	L	n/a	L	n/a	L	L/GL	n/a	L	L	n/a		n/a	n/a	L	L	L/GL	n/a	n/a	n/a
HIA																								
Short Term	?	?	?		+				n/a	n/a				?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Medium Term	?	?	?		+				n/a	n/a				?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Long Term	?	?	?		+				n/a	n/a				?	n/a		n/a	n/a		n/a	?/-	n/a		n/a
Direct / Indirect	I/D	I	I		D				n/a	n/a				I	n/a		n/a	n/a		n/a	D	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				n/a	n/a				T/P	n/a		n/a	n/a		n/a	T/P	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L				n/a	n/a				L	n/a		n/a	n/a		n/a	L/GL	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.2 GG1 Building strong and inclusive communities

Option description

This option focuses on the role of infrastructure as a means to deliver strong and inclusive communities. It aims to deliver physical, green and social infrastructure to meet the needs of communities, and promote a range of positive outcomes. This option supports the role of Healthy Streets, increasing digital connectivity and ensuring access to facilities and services is inclusive and accessible. This option would deliver housing based on a market-led approach.

Appraisal and recommendations

This option would support the delivery of key social infrastructure to meet the needs of local residents and help to facilitate community involvement and cohesion. There is particular emphasis on supporting inclusive design to ensure equity of access regardless of any impairment, illness or additional need. However, a market-led approach to housing may result in the shortfall of certain housing needs, for example provision to accommodate low-income communities, or individuals who require accessible and adaptable options.

The option would also encourage a range of economic benefits, and strengthen growth opportunities. Improving digital connectivity would help drive business in a modern, technological world and could play a role in attracting investment from across the globe. High quality digital infrastructure would also provide benefits to employees, facilitating flexible working arrangements, such as home working. This can improve wider access to employment, for example for individuals who are less mobile, or need to be close to health or educational services. This option would also support the provision of cultural infrastructure, which could improve wider access to cultural assets and facilitate growth in cultural industries.

This option strongly supports the delivery of social and physical infrastructure to meet the needs of London. A market-led housing approach would continue to drive housing delivery throughout London. However, as discussed, intervention may be required to ensure delivery responds to all housing needs across London's communities. The insufficient delivery of affordable housing could risk the displacement of some groups, which could have an adverse impact on access to opportunities and overall wellbeing.

A market-led approach to housing should not only focus on the delivery of large-scale, complex developments, which take many years to build. Smaller, local sites can make a valuable contribution to meeting overall housing need. Similarly, an infrastructure led approach would also help to unlock brownfield sites for housing development.

This option would benefit accessibility and connectivity through the delivery of infrastructure, particularly transport infrastructure. This could help to improve access across London and the Wider South East (WSE), facilitating growth and increasing access to opportunities in London, including employment, education and cultural assets. Provision for high quality active transport could also improve links between neighbourhoods and communities.

The provision of green infrastructure, along with the wider Healthy Streets agenda, would be particularly important for built-up urban areas, as green infrastructure can enhance biodiversity in areas where larger parks and green spaces are less accessible. This would help support equal access to the health and wellbeing benefits that green spaces provide. The promotion of the Healthy Street Approach would deliver further environmental benefits, contributing to improved air quality as it discourages private vehicle use, and encourages active transport.

Although delivery of physical infrastructure is a broad term, this option would likely offer improvements to aspects such as flood defence. This could help mitigate against extreme weather events and support communities most exposed to flood risks. It could also promote the delivery of energy infrastructure, and could take advantage of local and greener energy generation, particularly in new developments.

If appropriate measures are not in place, this option could increase pressure on historical assets and their wider setting by prioritising infrastructure growth over the protection of the historic environment. New infrastructure needs to ensure the protection of historical assets and complement the wider historical setting.

Recommendations

The market-led housing approach outlined in this option is unlikely to meet the needs of all communities across London. It was recommended that a more co-ordinated approach to housing and infrastructure delivery could be considered, including working closely with developers to ensure that affordable and accessible housing is provided where needed.

GLA response

The preferred option is a combination of the three appraised options. The preferred option contains elements of this option, promoting the delivery of key social, green and physical infrastructure to meet the needs of communities. This final option supports high quality design and ensuring inclusive access to all opportunities.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added, providing a comprehensive assessment of protected groups within London, including reference to LGBT+ communities, disabled people, young people and older people. The text has been amended to emphasise that this diversity is essential to the success of London's communities. This strengthens the policy narrative surrounding inclusivity, acknowledging the broad range of communities within London, and the contribution they make to vitality and city's success.

Additional wording has also been added to Paragraph 1.1.4 to ensure that built forms are compatible with existing local heritage and identity. This amendment was in response to perceived conflicts between access and inclusion, and heritage issues. It serves to strengthen the policy narrative surrounding maintaining the integrity of the historic environment by recognising the balance between new and existing assets.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 3: GG1 Building strong and inclusive communities

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						n/a	+		+	+	+	+	n/a	+	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Medium Term						n/a	+		+	+	+	+	n/a	+	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Long Term						n/a	+		+	+	++	+	n/a	+	+	+	+	+	+	+	+	+	n/a	n/a	n/a
Direct / Indirect						n/a	I/D		I	I/D	I/D	I	n/a	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	n/a	n/a	n/a	
Temporary / Permanent						n/a	T/P		T/P	T/P	T/P	P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	L	L/GL	L	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a	
EQIA																									
Short Term	+	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a	
Medium Term	+	+	+	+	+	+	+	+	+	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a	
Long Term	++	++	+	+	++	+	+	++	++	+	+	n/a	n/a	?/+	?/+		?/+	?/+	?/+	+	n/a	n/a	n/a	n/a	
Direct / Indirect	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	D	I/D	n/a	n/a	I/D	I/D		I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L	L/GL	L/GL /W	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	L/GL		L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a	n/a	
HIA																									
Short Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
Medium Term	+	+	+		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
Long Term	++	++	++		?				+	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
Direct / Indirect	D	D	I/D		I				I	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P		T/P				T/P	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L/GL	L/GL	L		L/GL				L/GL	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a	
CSIA																									
Short Term				+					+																
Medium Term				+					+																
Long Term				+					+																
Direct / Indirect				I/D					I																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L					L/GL																

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across London and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
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- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
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- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.3 SD1 Opportunity Areas

Policy description

The policy seeks to ensure that Opportunity Areas (OAs) fully realise their growth and regeneration potential. It also outlines how local planning authorities, through Development Plans and decisions, should support and deliver development and infrastructure growth for OAs. This includes the need to plan for social infrastructure, meet housing and employment needs, support and sustain industrial capacity, consider regeneration needs, integrate development into the wider area, and work with local communities and other stakeholders.

Initial appraisal and recommendations

Social, economic and environmental effects

Opportunity Area Planning Frameworks (OAPFs) must be prepared in a collaborative way with local communities and stakeholders, helping to ensure that change in these places contributes to the wellbeing of local communities. The delivery of OAs would support residential and employment growth in strategic locations which can help to remove barriers to social and economic opportunities, meet the need for new housing, including affordable housing, and improve overall life chances of existing and new residents. OAPFs also ensure the delivery of social infrastructure, which can meet the needs of Londoners by increasing access to key services and facilities.

This policy facilitates the delivery of high density, affordable homes which deliver mixed and inclusive communities. The delivery of affordable homes can support individuals to live and work in the city, access education and services, and help to alleviate overcrowding. New homes must conform to high design standards, which also contribute to a range of health and wellbeing outcomes. The efficient use of brownfield land helps to optimise limited land resources in London, and support wider housing delivery objectives. This could include facilitating the delivery of high-density housing, alongside a range of supporting social and physical infrastructure. The policy encourages wider regenerative benefits, placing emphasis on developing local character and identity, even within large-scale developments.

The policy supports collaboration with agencies such as TfL, to effectively identify where growth is needed, and help to set ambitious transport mode share targets. The development of high-density housing and other uses in well-connected locations would encourage sustainable travel by walking, cycling and public transport. More sustainable forms of public transport are likely to reduce emissions and facilitate improvements to air quality. The delivery of key infrastructure and housing supports employment growth potential in these strategic locations. The policy also supports local and strategic regeneration and employment opportunities to achieve inclusive growth and tackle inequalities.

Cumulative

This policy complements T1 Strategic approach to transport, S1 Developing London's social infrastructure and G1 Green infrastructure which support the provision of strategic transport and social and green infrastructure. This policy could conflict with SD4 The Central Activities Zone (CAZ) by spreading economic opportunities outside of traditional growth locations.

Recommendations

It was recommended that further information could be provided on inclusive transport access, including details on how active transport networks connect residential developments with key social infrastructure. It was also suggested that further reference to the housing needs of less mobile communities could be further drawn out in the policy. It was also recommended that further detail is provided on the measures

that will be taken to support green spaces and mitigate the impact of climate change, for example, whether targets are in place to improve air quality. It was also recommended that further reference could be made as to how such infrastructure provision could benefit existing communities, as well as new developments within growth corridors and opportunity areas.

GLA response

The GLA advised the purpose of this policy is to draw out any spatially specific considerations that apply to OAs generally and that other policies in the rest of the Plan would also apply; therefore, policies such as public realm, inclusive design, social infrastructure, air quality, green and open space, Healthy Streets and other transport policies addressed issues such as active travel, inclusive design, air quality, provision of open space in more detail. In addition, other GLA strategies provide further details on some of these issues. The GLA further advised that new infrastructure could benefit existing communities in different ways depending on the specific infrastructure provided. This will vary according to the specific circumstances of each OA and is better expressed within OAPFs themselves.

Appraisal of finalised policy

Some aspects of the policy were changed in the final draft, including the removal of specific reference to accessible and healthy spaces. Therefore, a number of the environmental objectives were changed to a neutral/positive scoring. However the policy still promotes regeneration and the removal of environmental, economic and social barriers, which broadly support these objectives. The policy instead makes reference to SD10 Strategic and Local Regeneration, which covers specific detail.

Implications for the HRA

The HRA screening showed no likely significant effects. OAs are relatively remote from European sites and the overall focus on the role of the London Plan relates to the improvement/delivery of sustainable public transport, which will be positive for air quality. Delivery of Crossrail 2 and the Trams Triangle proposals may be positive for air quality at Wimbledon Common SAC by removing vehicles from the local road network. The planning framework for Stoke Newington and Blackhorse Lane needs to avoid a significant increase in road freight traffic through Epping Forest SAC, by maximising connectivity to the strategic rail network.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been added to part B of the policy, which recognises the role of heritage in place-making. Further text has also been added to Paragraph 2.1.3, setting out that growth in Opportunity Areas should include understanding the existing character and context of an area, in accordance with Policy D2. Additional text has also been added to Paragraph 2.1.7 of the supporting text, which states that the Mayor will work with authorities outside London on the cross-boundary implications of Opportunity Areas.

These amendments ensure consistency with Policy HC1, and strengthen the policy narrative surrounding protecting and enhancing the historic environment.

Consultation responses also highlighted that the policy could result in potential benefits surrounding protecting and enhancing natural capital across London. If appropriately managed, improvement to the transport infrastructure, public realm and regeneration could have a number of positive environmental outcomes. These policy amendments have resulted in revisions to the scoring matrix below.

Table 4: SD1 Opportunity Areas

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+/?		+	+	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	+	+/?	+	n/a	n/a
Medium Term						+	+/?		+	+	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	+	+	+	n/a	n/a
Long Term						++	+/?		+	++	+	n/a	n/a	O/+	O/+	O/+	+/?	n/a	+	+	+	+	n/a	n/a
Direct / Indirect						I	I		I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I	n/a	I/D	I/D	I	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/ GL	L/ GL	L/ GL	n/a	n/a	L	L/ GL	L	L	n/a	L/ GL	L/ GL	L	L	n/a	n/a
EQIA																								
Short Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Medium Term	+	+	+	?	+	+	?	+	+	+	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Long Term	+	+	+	?	++	++	?	+	++	++	+	n/a	?	O/+	O/+		n/a	n/a	n/a	O/+	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	D	I	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D		n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L/ GL
HIA																								
Short Term	+	+	+		+				+	n/a				O/+	O/+		O	n/a		O/+	n/a	n/a		+
Medium Term	+	+	+		+				+	n/a				O/+	O/+		+	n/a		O/+	n/a	n/a		+
Long Term	+	+	+		++				+	n/a				O/+	O/+		+	n/a		O/+	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	n/a				I/D	I/D		D	n/a		D	n/a	n/a		D
Temporary / Permanent	P	P	P		P				T/P	n/a				T/P	T/P		P	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				L/ GL	n/a				L/ GL	L/ GL		L/ GL	n/a		L/ GL	n/a	n/a		L/ GL
CSIA																								
Short Term				n/a					?															
Medium Term				n/a					?															
Long Term				n/a					?															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/ P															
Local / Greater London / Wider Region / Global				n/a					L															

Objectives

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- To conserve London's geodiversity and protect soils from development and over intensive use.
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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.4 SD2 Collaboration in the Wider South-east (WSE)

Policy description

The policy supports a strategic approach to governance, to enhance the understanding of regional and sub-regional economic, social, and environmental challenges and opportunities. It also aims to emphasise the role of WSE partners in collaboration with the Mayor, to address shared concerns regarding housing and infrastructure, the environment, and industrial capacity.

Initial appraisal and recommendations

Social, economic and environmental effects

The collaborative mechanisms that this policy sets out would facilitate and co-ordinate improvements to accessibility and connectivity within and around London. There is a strong emphasis on the role of strategic public transport to underpin growth, through the development of growth corridors and increased rail capacity. The policy identifies a need to strategically manage challenges, such as addressing barriers to housing. This could play a role in meeting the housing needs of London and the wider region to alleviate pressures such as overcrowding and homelessness. The substitution of some industrial functions may help to enable the delivery of homes by increasing the availability of land and support wider economic growth across the wider region.

Implementation of the policy would result in positive effects on the provision of infrastructure and economic competitiveness. It would help to ensure land is used in a sustainable manner, integrating new developments with good transport access. The co-ordinated provision of high quality transport infrastructure would also help to mitigate adverse impacts associated with high density development. This policy also ensures that the delivery of housing, business and infrastructure is in strategic locations where mutual benefits can be achieved.

Improvements to public transport infrastructure would help reduce public car use and associated emissions. This could contribute to a reduction in carbon and promote a low-carbon economy, in addition to a reduction in noise pollution. This policy also outlines the need to collaborate on cross-border environmental issues including waste management, flood risk and climate change.

Cumulative

This policy complements policies E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function, T3 Transport capacity, connectivity and safeguarding and G5 Urban greening, which support the increase in construction, industrial activity and the enhancement of green spaces. This policy may create positive economic effects through investment in transport and other infrastructure.

Recommendations

It was recommended that further reference could be provided on affordable and adaptable housing, to ensure that a range of housing needs are considered across the wider region. Details on other types of supporting infrastructure, such as health and education provision, as well as the economic opportunities associated with housing and infrastructure delivery, could also be considered.

It was recommended that the policy could extend its scope to include air quality as an issue London and the wider region could manage together.

It was also recommended that further detail could be provided on sustainable opportunities associated with a co-ordinated approach to governance, for example referencing the Healthy Streets approach and green technologies.

GLA response

Additional text was added to ensure strategic concerns were managed in a collaborative way with WSE partners. Additional text was also added to highlight air quality as a regional issue.

The GLA however clarified that issues such as education, health, open space provision are more cross boundary issues rather than WSE planning issues.

With regard to other recommendations, the GLA consider that it is more appropriate for further information and clarification to be provided through other policies within the London Plan, as well as alternative documents such as the London Environment Strategy.

Appraisal of finalised policy

No further appraisal required as the amendment to the draft policy is not significant, the appraisal is therefore as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Part B of this policy promotes the joint preparation of evidence and encourages plan preparation by Authorities outside of GLA to take into account long term trends and mitigation. This could for example be a tool to encourage the London Boroughs around Epping Forest (Enfield, Redbridge and Waltham Forest) to work with the Essex authorities north of Epping Forest to manage air quality and recreational pressure issues associated with that SAC

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been added to part E of the policy, specifying that the Mayor will work with Wider South East partners to find solutions to shared strategic concerns such as biodiversity and green infrastructure.

Although the policy text already supported working with strategic partners to improve cross-boundary environmental issues, the additional wording strengthens the overall narrative surrounding protecting, connecting and enhancing London's natural capital. This is likely to result in positive outcomes for environmental protection, health and wellbeing in the long term.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 5: SD2 Collaboration in the Wider South-east and beyond

	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	n/a		+	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	+	+	+
Medium Term						+	n/a		+	+	+	n/a	n/a	+	+	+	+	+	+	+	n/a	+	+	+
Long Term						+	n/a		++	++	++	n/a	n/a	++	++	++	++	++	++	++	n/a	+	++	+
Direct / Indirect						D	n/a		D	D	D	n/a	n/a	D	I	I	I/D	D	D	D	n/a	D	D	I
Temporary / Permanent						P	n/a		P	P	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	P	P	T/P
Local / Greater London / Wider Region / Global						W	n/a		W	W	W	n/a	n/a	W	W	W	W	W	W	GL/W	n/a	L	W	W
EQIA																								
Short Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	n/a	n/a	+	+/?	n/a	+/?	+	+	+	n/a	n/a	n/a	+		n/a	+	+	n/a	n/a	n/a	+	+
Direct / Indirect	n/a	n/a	n/a	n/a	D	I/D	n/a	D	D	I/D	D	n/a	n/a	n/a	I		n/a	D	D	n/a	n/a	n/a	I/D	I
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P		n/a	T/P	T/P	n/a	n/a	n/a	P	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	W	W	n/a	W	W	GL/W	GL/W	n/a	n/a	n/a	W		n/a	GL/W	GL/W	n/a	n/a	n/a	GL/W	W
HIA																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Medium Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Long Term	n/a	n/a	n/a		+				n/a	n/a				+	n/a		n/a	+		n/a	n/a	n/a		+
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				D	n/a		n/a	D		n/a	n/a	n/a		I
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				T/P	n/a		n/a	T/P		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		W				n/a	n/a				W	n/a		n/a	W		n/a	n/a	n/a		W
CSIA																								
Short Term				?					n/a															
Medium Term				?					n/a															
Long Term				?					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				W					n/a															

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4.5 SD4 The Central Activities Zones (CAZ)

Policy description

The policy seeks to promote and enhance the Central Activities Zone (CAZ) as an international centre of excellence due to commercial, environmental, and cultural offerings. This includes the provision of both transport and social infrastructure in order to further the security and resilience of the CAZ, as well as to meet the distinct needs of residential communities and ensure there is sufficient industrial capacity to serve the CAZ.

Initial appraisal and recommendations

The CAZ offers a unique combination of office functions, night-time activities, leisure destinations, international shopping and numerous specialist clusters (such as state, medicine, law and education). This demonstrates the important role the CAZ has in providing capacity for business and delivering a diverse economy. The delivery of digital infrastructure to provide fast, reliable internet, would support increase economic growth and prosperity. The policy also supports local and strategic regeneration and employment opportunities to achieve inclusive growth and tackle inequalities, by identifying Special Policy Areas and Opportunity Areas to increase employment capacity.

This policy facilitates the protection and enhancement of a diverse range of strategic functions located within the CAZ. This includes its functions associated with the State, Government and Monarchy, its cultural, arts, entertainment, night-time economy and tourism functions as well as its nationally and internationally office function. The promotion of inclusive access to green and open spaces, enhancing employment and educational opportunities and securing appropriate social infrastructure to support residential areas are also supported. The delivery of transport infrastructure and promotion of active transport can remove barriers to social and economic opportunities in the city, and encourage physical exercise, supporting a range of health and wellbeing outcomes.

The location of cultural, arts, entertainment, night-time and tourism functions within the CAZ contributes significantly to London's culture and cultural education which can help to facilitate greater social inclusion and fulfilling lifestyles.

By promoting inclusive access to green and open spaces, and encouraging active and sustainable forms of transport this policy would help to mitigate against air pollution, diverse impacts associated with climate change and the heat island effect arising from intensive land use in the CAZ. However, the cumulative effect of the night-time economy and some entertainment functions could increase noise disturbance for residents, workers and users of the CAZ.

Cumulative

This policy could conflict with policies D13 Noise and SI1 Improving air quality which support the increase in air quality and reduction of noise pollution. These policies may be negatively affected due to growth in the CAZ including construction and other industries that have potential to impact the environment. The policy complements policies E11 Sector growth opportunities and spatial clusters, T9 Funding transport infrastructure through planning and D6 Optimising housing density which support the intensification of the central London economy and promote London as an economically competitive city.

Recommendations

It was recommended that details on accessibility, legibility, safety and security should be considered. It was also recommended that further detail is provided on a definition of inclusive employment opportunities within the CAZ, for example whether job creation associated with the CAZ and other opportunity areas accommodates a range of sector skills and physical needs.

GLA response

The GLA advised that other policies in the Plan address other issues such as inclusive employment, safety and security, inclusive design. The GLA also advised that the Mayor's Economic Strategy set out more detail in relation sectors and skills.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been added to part H of the policy, specifying that the inclusiveness of the CAZ to residents, visitors and businesses should be enhanced through public realm improvements and the reduction of traffic dominance. This strengthens the policy narrative surrounding inclusivity and ensuring all communities and visitors within London can benefit from opportunities associated with the CAZ. This is likely to have beneficial outcomes for equalities groups across London, particularly people with a disability or existing health condition, low-income groups, ethnic minorities, young people and older people.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 6: SD4 The Central Activities Zones (CAZ)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	+	+	O	+	O	O	O	n/a	n/a	n/a	O	+	+	n/a	-
Medium Term						+	+		+	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Long Term						+	+		++	++	+	+	+	+	+	+	n/a	n/a	n/a	+	+	+	n/a	-
Direct / Indirect						I	I/D		I/D	I/D	I/D	I/D	I/D	I	I	I	n/a	n/a	n/a	I/D	I/D	D	n/a	D
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P	P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	L/ GL		L/ GL	L/ GL	L/GL /W	L/ GL	L/ GL	L	L/ GL	L	n/a	n/a	n/a	L/GL /W	L	L	n/a	L
EQIA																								
Short Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	O	O		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Medium Term	+	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Long Term	++	+	+	?	+/?	+/?	+/?	+	+	+	+	?	+	+	+		n/a	n/a	n/a	+	+/?	n/a	n/a	-
Direct / Indirect	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I/D	I	I/D		n/a	n/a	n/a	I/D	I/D	n/a	n/a	D
Temporary / Permanent	P	P	P	T/P	T/P	T/P	P/T	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P		n/a	n/a	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L	L/ GL		n/a	n/a	n/a	L/ GL	L	n/a	n/a	L
HIA																								
Short Term	+	+	+		?				+	n/a				O	O		n/a	n/a		+	O	n/a		-
Medium Term	+	+	+		?				+	n/a				+	O		n/a	n/a		+	O	n/a		-
Long Term	+	+	+		?				+	n/a				+	O		n/a	n/a		+	O	n/a		-
Temporary / Permanent	I/D	I/D	I/D		D				D	n/a				D	I		n/a	n/a		D	D	n/a		D
Direct / Indirect	P	P	P		P				P	n/a				T/P	T/P		n/a	n/a		T/P	T/P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L/ GL				L/ GL	n/a				L/ GL	L/ GL		n/a	n/a		L/ GL	L	n/a		L
CSIA																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/ GL					L															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.6 SD6 Town centres- strategy

Policy description

The policy supports the protection and development of London's varied town centres, and seeks to address challenges and opportunities that arise from changes in technology and consumer behaviour. The policy outlines both the potential role of town centres in residential development and intensification of commercial business.

It also seeks to outline the delivery of barrier-free and inclusive town centre environments that meets the needs of all Londoners, including the provision of social infrastructure and improved safety and security.

Initial appraisal and recommendations

Social, economic and environmental effects

Town centres promote higher density, mixed-use development to support a range of social, economic and housing needs. Accessible, resilient and diverse town centres can encourage growth in strategic locations to help remove barriers to social and economic opportunities, meet the needs for new housing and improve overall life chances. High quality social infrastructure can encourage active and fulfilling lives, delivering facilities for events and activities in which social networks can form. Supporting infrastructure such as lighting, signage and active frontages are key features which would help to support safe transport and improve perceptions of safety.

Implementation of the policy would support development in town centres and their surroundings. This would benefit a diverse range of economies, including culture, leisure, shopping, night-time, tourism and business. The policy also supports new commercial development and promotes tourist infrastructure, supporting and enhancing London's cultural offerings. Investment in the existing built environment, including heritage assets, would also help to preserve the physical integrity of heritage assets and their town centre settings.

This policy supports the development of high-density, well-connected housing to encourage sustainable travel by walking, cycling and public transport. This can encourage more active, healthier lifestyles and support lower-income or less-mobile groups. More sustainable forms of public transport are also likely to reduce emissions and encourage improvements to air quality and climate change. Measures such as green infrastructure, tree planting and urban greening would offer further environmental benefits and improve London's natural capital and green space network. However, this policy may increase noise disturbance from localised commercial and community activity, which may disproportionately impact more sensitive receptors such as schools, community facilities, care homes and religious institutions.

Cumulative

This policy aligns with policies S1 Developing London's social infrastructure, SI6 Digital connectivity and D3 Inclusive design which support the economic and social development of town centres, especially the potential increase of social inclusion and community.

Recommendations

It was recommended details on legibility measures, design and social infrastructure were considered. It was also recommended that further detail is provided on education and skills provision, the provision of green space and alleviation of noise disturbance, for example how noise from the night-time economy might be managed.

GLA response

The final Policy text was updated to include alternative language around inclusive town centre environment. With regard to other recommendations, the GLA advised that other policies within the Plan addressed the issues raised such as employment opportunity, night-time economy, agent of change, noise, social infrastructure, etc.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. It can be considered that at the London Plan level there are no linking impact pathways.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording, including specifying that the potential for new housing within and on the edges of town centres should be realised through mixed-use residential development that makes best use of land, as opposed to through 'higher density'. This change was made as 'higher density' was considered an ambiguous term. This wording amendment has also been made in Paragraph 2.6.2 of the supporting text.

This amendment strengthens the narrative surrounding making the best and most efficient use of land within town centres across London. This is likely to support sustainable forms of development, and ensure a sufficient range of land uses. The policy supports residential-led intensification, and an additional paragraph has been added to 2.6.4 which further supports mixed-use residential development within town centres. The amendment does not discourage high density development, but instead clarifies that development should be mixed and land is used appropriately and effectively. This additional supporting text supports town centre vitality through the delivery of diverse housing, outside the primary shopping area, and primary and secondary shopping frontages, where it can be demonstrated that it would not undermine local character.

This additional text strengthens the narrative surrounding residential development in urban areas, and could contribute towards much needed housing in the capital. It also supports the appropriate location of development, in order to protect and enhance existing character of town centres.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 7: SD6 Town centres-strategy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	+	+	n/a	+	O	n/a	O	n/a	n/a	n/a	O	+	+	n/a	?/-
Medium Term						+	+		+	+	+	n/a	+	+	n/a	+	n/a	n/a	n/a	+	+	+	n/a	?/-
Long Term						+++	+		+	++	+	n/a	+++	+	n/a	+	n/a	n/a	n/a	+	+	+	n/a	?/-
Direct / Indirect						I	I/D		I/D	I/D	I/D	n/a	I/D	I	n/a	I	n/a	n/a	n/a	I/D	I/D	D	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	T/P	P	n/a	P
Local / Greater London / Wider Region / Global						L	L/GL		L/GL	L/GL	L/GL	n/a	L/GL	L	n/a	L	n/a	n/a	n/a	L/GL	L/GL	L	n/a	L
EQIA																								
Short Term	+	+	+	+	+/?	+	+/?	+	+	+	+	?	+	O	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?/-
Medium Term	+	+	+	+	+	+	+/?	+	+	+	+	?	+	+/?	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	?/-
Long Term	++	++	+	+	+	+++	+/?	++	+	+	++	?	+	+/?	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	?/-
Direct / Indirect	D	D	D	I/D	D	D	I/D	D	I/D	I/D	D	I/D	I/D	I	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L	L	L	L	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a		n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		O				+	n/a				O	n/a		n/a	n/a		O	n/a	n/a		?/-
Medium Term	+	+	+		+				+	n/a				O	n/a		n/a	n/a		+	n/a	n/a		?/-
Long Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		?/-
Direct / Indirect	D	D	D		D				D	n/a				I	n/a		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	P	P	P		T/P				P	n/a				T/P	n/a		n/a	n/a		T/P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L	L	L		L				L/GL	n/a				L	n/a		n/a	n/a		L/GL	n/a	n/a		L
CSIA																								
Short Term				O					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.7 SD8 Town Centres - Development principles and local plans

Policy description

The policy supports a ‘town centres first’ approach in Development Plans and development proposals. This is in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development.

Initial appraisal and recommendations

Social, economic and environmental effects

Town centres act as an important centre for local economic growth and provide a range of important social services and facilities. A town centres first approach would help to promote inclusive access to the range of services and social and cultural activities these locations offer. These opportunities encourage social integration, and provide new opportunities to improve life chances and wider wellbeing. The town centres approach would also help to emphasise the role of active frontages, and the night-time economy, which could help to improve perceptions of safety at night-time and contribute to objectives relating to safety and security.

Encouraging boroughs in identifying sites suitable for higher density mixed-use residential intensification would help to optimise housing delivery in an efficient and sustainable way. It would ensure developments are accessible to both public and active transport networks, and supporting social infrastructure. This would help to improve the legibility of town centres, retail and leisure environments. Well-connected developments which encourage sustainable travel by walking, cycling and public transport can also encourage more active, healthier lifestyles and support lower-income or less-mobile groups.

This support for high density, well-connected town centres encourages more sustainable forms of public transport which is likely to reduce emissions and encourage improvements to air quality and climate change mitigation and adaptation. The need the layout of land uses in town centre developments could also improve the local environment by mitigating against issues such as noise exposure through careful design and management

Cumulative

This policy aligns with policies E10 Retailing and D2 Delivering good design which support local social integration through multipurpose town centres. Additionally, policies SI1 Improving air quality and T2 Healthy streets align with this policy as active transport is encouraged, which will potentially reduce use of private vehicles.

Recommendations

It was recommended that further information be provided on the supporting infrastructure that could be developed to support a town centre approach. Details on the provision of green space, cultural participation to support vibrant town centres, and affordability should be considered. It was also recommended that further detail is provided on how employment in declining retail sectors could be managed, particularly in out-of-centre locations, for example this could include opportunities to re-train staff, and the provision of affordable business units as part of new developments.

GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance. The GLA advised that issues such as affordable workspace, social infrastructure, culture, green space provision and active travel were addressed more specifically elsewhere in the Plan. Detailed information for specific town centres should be provided by boroughs through local plans.

The GLA further advised that skills and training were more appropriately addressed in the Mayor’s Economic Strategy.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy also positively promotes redevelopments should encourage and ensure more sustainable transport by public transport, cycling and walking which will positively affect air quality levels. It can be considered that at the London Plan level there are no linking impact pathways.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional text has been added to part B of the policy, supporting the protection of out-of-centre high streets as neighbourhood centres, local parades or business areas, and the need to develop appropriate policies to support and enhance the role of these high streets. The additional text also includes the need to recognise the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment. This amendment includes high streets within the policy, alongside town centres, and to encourage residential development where appropriate.

This is likely to have positive outcomes for safeguarding and enhancing the role and value of high streets for local communities. This could improve accessibility and amenity for local residents, workers and visitors, and stimulate local economic growth. The additional text also supports opportunities for residential development where appropriate, to help increase housing supply across London.

An additional clause was also added to part B4 of the policy, setting out that the criteria for intensification within town centres should take into account the capacity and proximity of social infrastructure. This supports the requirement for adequate infrastructure to ensure balanced, and sustainable development, and is likely to improve access to services for local residents.

Policy wording has also been removed from Paragraph 2.8.4 of the supporting text. This includes removing reference to housing-led development, active frontages and welcoming streetscapes in out of centre locations. This amendment has been made as out of centre housing developments and design are considered as part of D4, and therefore did not need to be repeated.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 8: SD8 Town centre development principles and local plans

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+/?		+	n/a	+	n/a	+	O	n/a	O	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+/?		+	n/a	+	n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+/?		+	n/a	+	n/a	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		I/D	n/a	I/D	n/a	I	I	n/a	I	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/GL		L/GL	n/a	L/GL	n/a	L	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	?	?	+/?	+/?	+/?	+	+	+	+	n/a	?	O	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	?	?	+	+/?	+/?	+	+	+	+	n/a	+/?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	++	++	?	?	+	+/?	+/?	+	+	+	++	n/a	+/?	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I	I	I/D	I/D	I/D	I/D	I/D	I/D	C	n/a	I/D	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	T/P	T/P	P	P	P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L	L/GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		O					+	+/?				O	n/a		n/a	n/a		n/a	n/a		O
Medium Term	+	+	+		+/?					+	+/?				O	n/a		n/a	n/a		n/a	n/a		O
Long Term	+	+	+		+					+	+/?				+	n/a		n/a	n/a		n/a	n/a		+
Direct / Indirect	D	D	D		D					D	I/D				D	n/a		n/a	n/a		n/a	n/a		I
Temporary / Permanent	P	P	P		P					P	T/P				T/P	n/a		n/a	n/a		n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		L					L/GL	L/GL				L	n/a		n/a	n/a		n/a	n/a		L
CSIA																								
Short Term				n/a						?														
Medium Term				n/a						?														
Long Term				n/a						?														
Direct / Indirect				n/a						I/D														
Temporary / Permanent				n/a						T/P														
Local / Greater London / Wider Region / Global				n/a						L														

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.8 SD9 Town centres local partnership and implementation

Policy description

The policy aims to develop strong, resilient and adaptable town centres through place-specific town-centre strategies which ensure that the local community continues to be well served and that the network of town centres across London continues to function.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy supports a community and partnership-led approach to developing and managing town centres. It identifies the importance of social benefits town centres offer, acting as a key location for social activity and integration, particularly for more vulnerable people. Social interaction plays a pivotal role in individual health and wellbeing and this policy ensures town centres continue to provide access to the most important social facilities and services.

A partnership-led approach to developing resilient and adaptable town centres also supports the delivery of housing, and associated supporting infrastructure. This includes supporting boroughs to consider a range of mechanisms to deliver housing intensification and mixed-use development, as well as local authorities exploring regeneration, growth and intensification opportunities. Emphasis on community consultation, a tailored approach to development, and preserving local services of amenity value is likely to encourage the appropriate provision, capacity and quality of infrastructure needed to underpin residential and commercial growth. This interaction with the community may also facilitate a sense of ownership by allowing local residents to influence their locality to suit their needs and expectations.

Cumulative

This policy complements policies T3 Transport capacity, connectivity and safeguarding and S1 Developing London's social infrastructure which support the connectivity between town centres and the improvements to social infrastructure. This policy may conflict with SD4 The Central Activities Zone (CAZ) as newly developed economic growth in local areas may compete with existing locations and cause negative effects to existing employees and businesses.

Recommendations

It was recommended that further information be provided on how Town Centre Strategies could support and develop cultural infrastructure, and appropriate access to such opportunities. It was also recommended that further detail is provided in relation to housing development, for example the policy could make reference to affordable, adaptable and accessible provision. The policy could reference measures to prevent the displacement of low value uses within town centre development.

GLA response

No changes are proposed to be made to the draft policy, although amendments made to the supporting text to provide additional guidance and clarity. The GLA advised that further information is provided in other policies within the Plan which address cultural uses and housing, and that it is more appropriate for further information for specific town centres to be provided by boroughs through local plans.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways.

Post-consultation amendments

Following consultation, a number of amendments to the policy have been made to the policy wording. Changes have been made to the Policy SD9A, which states that strategic and local partnership approaches should be supported and encouraged. These partnerships may be in the form of town centre management, business associations, Neighbourhood Forums, trader associations and Business Improvement Districts, and should be inclusive and representative of the local community.

A new clause (SDAa) was added, stating that the development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres. The policy sets out that Town Centre Strategies should be produced in partnership at the local level in a way that is inclusive and representative of the local community. These additions strengthen the narrative surrounding inclusive and representative growth, and overcoming economic challenges, and has resulted in revisions to the scoring matrix below.

The consultation responses raised concerns that there were unknowns identified in the EqIA appraisal for the policy. This significance criterion was applied as it was considered that there was insufficient information to make a robust assessment.

The consultation responses also raised concerns that the policy could result in the displacement of communities and low value uses in favour of higher value uses. The policy supports appropriate strategies tailored to each town centre, and developed with input from relevant stakeholders, including community and amenity groups. It states that town centre strategies should pay particular regard to the social benefits of high streets and town centres, especially the formal and informal networks that support local communities. It is expected that the policy will have positive outcomes for housing and infrastructure provision, along with protecting and enhancing the needs of local communities.

A recommendation has however been made to the GLA that the Policy could reference measures to prevent the displacement of low-value uses, such as laundrettes, within town centre development, which could disproportionately impact equalities groups.

GLA Response – post-consultation amendments

The Policy promotes that Town Centre Strategies should be tailored to each town centre with a clear vision developed with the local community, taking account of the town centre's strategic role, opportunities for growth, and potential to support regeneration, spatial characteristics, and economic challenges.

Table 9: SD9 Town centres local partnership and implementation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						?	n/a		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	n/a		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	n/a		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	n/a	n/a	+/?	+	?/+	n/a	n/a	+	+	n/a	?/+	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	+/?	+	+/?	n/a	n/a	+	+	n/a	+/?	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	+/?	+	+	n/a	n/a	+	+	n/a	+/	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	n/a	n/a	I/D	I/D	I/D	n/a	n/a	I/D	I/D	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a
Temporary / Permanent	P	P	n/a	n/a	T/P	T/P	P	n/a	n/a	T/P	P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	n/a	n/a	L/ GL	L/ GL	L	n/a	n/a	L/ GL	L/ GL	n/a	L	n/a	n/a		n/a	n/a	n/a	n/a	L	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/ GL					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.9 SD10 Strategic and local regeneration

Policy description

The policy supports regeneration based on local community knowledge and an understanding of the particular needs of the area. It also outlines how Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy facilitates the protection and enhancement of community facilities and social infrastructure through local plans which target specific spatial issues and inequalities. Community facilities and services provide centres for social integration and interaction, which can contribute significantly to health and wellbeing. This policy also recognises the role cultural facilities, employment and education can have in the development of social networks. This spatially-target approach would therefore particularly benefit those areas more deprived of these opportunities and facilities, addressing barriers and enabling individuals to live more active, fulfilling lives. By acknowledging and using the knowledge of the local community, this policy may also encourage a greater sense of ownership in local areas by allowing individuals to influence the development of their locality, whilst benefiting the local authority and developers who can target specific problems and needs.

By setting out integrated spatial policies to target localised issues, issues relating to housing and housing provision can be managed. Identifying areas with high levels of homelessness, overcrowding or low housing affordability would enable local authorities to concentrate on the needs of the community and address these specific, more localised issues. Similarly, transport and accessibility inequalities can be addressed, removing actual and perceived barriers to the wider social and economic opportunities London has to offer. The policy also supports local and strategic regeneration which may help to achieve inclusive growth and tackle wider inequalities.

Local and strategic regeneration, through integrated spatial policies, may facilitate improvements to environmental factors in the local community. Issues such as poor air quality and a lack of green and open space are often prevalent in more deprived areas, but this approach to local regeneration can help reduce these inequalities by targeting these deprived areas more directly.

Cumulative

This policy may conflict with policies H1 Increasing housing supply, E4 Land for industry, logistics and services to support London's economic function and H5 Delivering affordable housing which support new developments and spatial land take. This policy complements policies H11 Ensuring the best use of stock, H10 Redeveloping existing housing and Estate regeneration and G1 Green infrastructure which support the protection of land and increased efficiency of space through mixed use developments.

Recommendations

It was recommended that further information be provided on support for local and independent businesses, as well as affordable housing. Details on how these businesses are encouraged alongside higher value industries and the aspects of employment, such as types of job, should be considered.

It was also recommended that further detail is provided on how environmental, economic and social barriers could be overcome, for example how provision of green spaces, access to the open space network, safety, and inclusive leisure opportunities may be achieved.

GLA response

The GLA advised that other policies such as low cost and affordable workspace, community safety, design, affordable housing, social infrastructure, etc. addressed these issues more specifically. Policy CC3 specifically requires an integrated approach to managing health issues.

The GLA further advised that the Mayor's Economic Strategy more appropriately addressed issues such as types of jobs.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. An additional clause has been added to part 3 of the Policy, setting out that boroughs should engage communities, particularly those in Strategic and Local Areas for Regeneration, at an early stage and throughout the development of local development documents, strategies and regeneration programmes.

Additional wording was also added to Paragraph 2.3.10, setting out that Development Plans and Opportunity Area Planning Frameworks should be developed through engagement with local communities. These amendments strengthen the policy narrative surrounding community and stakeholder engagement, and support an inclusive approach to development and regeneration across London. This is likely to encourage growth that meets the diverse needs of communities, and could help to align infrastructure provision and placemaking objectives with local needs and values.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 10: SD10 Strategic and local regeneration

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Medium Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Long Term						?	n/a		+	+O	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	?	+	n/a	n/a
Temporary / Permanent						I	n/a		I/D	I/D	I/D	I/D	D	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D	D	n/a	n/a
Direct / Indirect						T/P	n/a		T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L	n/a	n/a
EQIA																								
Short Term	+	+	+	?	?	+/?	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Medium Term	++	+	+	?	?	+	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Long Term	++	++	++	?	?	+	+	+	+	+O	?	+	+	n/a	n/a		n/a	n/a	n/a	?	?	n/a	n/a	n/a
Temporary / Permanent	D	D	D	I/D	I/D	D	I/D	I/D	I/D	I/D	I/D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a		n/a	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Medium Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Long Term	+	+	+		O				n/a	n/a				O/+	n/a		n/a	n/a		O	O	n/a		n/a
Temporary / Permanent	D	D	D		I				n/a	n/a				I	n/a		n/a	n/a		I	I	n/a		n/a
Direct / Indirect	T/P	T/P	T/P		P				n/a	n/a				P	n/a		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		L/ GL				n/a	n/a				L/ GL	n/a		n/a	n/a		L/ GL	L/ GL	n/a		n/a
CSIA																								
Short Term				?							?													
Medium Term				?							?													
Long Term				?							?													
Temporary / Permanent				I/D					I/D															
Direct / Indirect				T/ P					T/ P															
Local / Greater London / Wider Region / Global				L					L															

Objectives

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- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.10 D2 Delivering good design

Policy description

The policy supports the delivery of good design through the recommendation of processes and actions for the design analysis and visualisation, design quality and development certainty, design scrutiny and maintenance emerging designs.

It also aims to understand the capacity for growth of an area to inform sustainable options for growth and to identify the most appropriate form of development for the area. The evaluation of the area includes the description of the current social, cultural, physical and environmental features and potential opportunities for the future.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would result in positive effects on social objectives as it strongly supports the appropriate design of buildings which provide sufficient open space and amenities that meet the needs of local residents. This policy ensures the design of developments is fully informed by evidence-based studies. This would facilitate the delivery of context-specific developments which encourage equality and social integration. Awareness and sensitivity can help ensure new developments manage health issues and health inequalities.

Through the use of important socio-economic data, this policy could benefit housing objectives. Data can identify issues such as homelessness, fuel poverty and overcrowding, which can be improved through the implementation of high quality, well designed housing.

The implementation of this policy would support sustainable land use, design and infrastructure objectives. It ensures that socio-economic data is used to inform design and ensure developments meet the needs of the local areas.

This policy's support for high-quality appropriate design, informed by a review of evidence, is likely to help improve accessibility and connectivity to key infrastructure and services. These reviews would assess movement and transport networks, public transport accessibility and active transport networks to inform design outcomes, helping to support more vulnerable, less mobile groups.

This policy could also benefit education and employment objectives through consideration of socio-economic data which can inform developers of issues such as employment rates, income, school capacity or qualification attainment. This again would help inform design decisions and understand the local capacity of key services. Similarly energy and waste objectives may benefit from the attainment of reliable data to identify where supporting infrastructure may be needed in response to the delivery of new developments.

Implementation of this policy is likely to result in a range of environmental effects. The consideration of air quality and noise data would ensure this policy positively impacts on these related objectives. The identification of areas experiencing particularly poor air quality and excess noise, which are often more prevalent in deprived areas, can help ensure new developments are able to respond positively to addressing these issues, providing wider health benefits and reducing health inequalities through high quality design in areas where it is most needed. Moreover, reliable data could be used to also encourage further protection and enhancement of natural capital. For example, assessing access to nature would identify deficiencies which could be improved through design.

Cumulative

This policy complements policies G5 Urban greening, HC4 London view management framework and local views, S11 Improving air quality and E5 Strategic Industrial Locations (SIL) which support the quality provision of sustainable growth across a variety of sectors.

Recommendations

This policy suggests a variety of data and evidence which can be used to inform design. However, it was recommended that crime statistics were also considered, particularly as the practice of 'designing out crime' can help improve the public realm and wellbeing of residents.

Further details on how the data could be used was recommended. Examples of this included focusing on the provision of office or retail space in areas of high unemployment, highlighting areas with high levels of housing deprivation, controlling development in areas of poor air quality, putting appropriate restrictions in place to manage noise levels. Additional evidence and data could be collated on the existing location, access routes and capacity of surrounding infrastructure.

Despite this policy focusing on the delivery of good design, there was little reference to sustainable design, for example using green infrastructure, renewable energy or innovative waste management.

GLA response

No significant changes were made to the policy however a reference to also consider crime statistics was added. Many of the recommendations made are covered by other policies, including transport, air quality, sustainable design and economic policies, which addresses these issues more specifically.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy as it outlines the requirement for new development to consider public transport accessibility and movement and transport networks and air quality which has potential to reduce atmospheric pollution. Open space, green infrastructure and water bodies also require consideration. Consideration of these types of provision has potential to divert recreational pressure away from sensitive wildlife sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Further clarification text was provided for part F, including amendments to make it clear that the design scrutiny process forms an important part of the assessment of development proposals. It also clarifies that the design review is an additional tool that is not mandatory apart from a small number of applications that meet the threshold. The policy wording amendments strengthen the narrative surrounding design scrutiny, and supports drawing upon expert advice where appropriate.

Wording amendments were also made to part H of the policy. The requirement of using architect retention clauses in legal agreements was removed from the policy wording, and added into the supporting text. This amendment was made to clarify that the architect retention clause is not a

mandatory requirement, but one that boroughs can utilise if they consider it an appropriate option. This clarification was made due to the challenges surrounding how continuity in the development process is enforced, but overall continues to encourage the role of designers post planning.

In addition, Figure 7.4, currently located within Policy HC1, has been moved to Policy D2, to illustrate the broad characteristics of London as a result of its historical development. This information can be used to inform area-based strategies. This amendment has strengthened the narrative surrounding appropriate growth in line with an areas context and character, and could further protect and enhance the historic environment. These policy amendments have resulted in revisions to the scoring matrix below.

Table 11: D2 Delivering good design

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Medium Term						+	+		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Long Term						+	++		+	+	+	?	+	+	n/a	+	?	n/a	n/a	+	+	n/a	+	+
Direct / Indirect						I	D		D	D	D	I	I	I	n/a	I	I	n/a	n/a	D	D	n/a	I	I
Temporary / Permanent						P	P		P	P	P	P	P	P	n/a	P	T	n/a	n/a	P	P	n/a	P	P
Local / Greater London / Wider Region / Global						L	L		L	L	L	L	L	L	n/a	L	L	n/a	n/a	L/GL	L/GL	n/a	L	L
EQIA																								
Short Term	+	+	+	n/a	?	+	+	O	O	n/a	?	?	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	?
Medium Term	+	+	+	n/a	?	+	+	+	+	n/a	+	?	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	?
Long Term	+	+	+	n/a	?	+	++	+	+	n/a	+	?	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	+
Direct / Indirect	I	I	I	n/a	I	I	I/D	I/D	I/D	n/a	I/D	I/D	n/a	I	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	P	P	P	P	n/a	P	P	n/a	P	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	n/a	L/GL	L	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	n/a	L	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Long Term	+	+	+		+				+	n/a				+	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		D				D	n/a				I	n/a		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	T	T	T		P				P	n/a				P	n/a		n/a	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L	L	L		L				L	n/a				L	n/a		n/a	n/a		L/GL	n/a	n/a		L
CSIA																								
Short Term				O					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				I/D					D															
Temporary / Permanent				P					P															
Local / Greater London / Wider Region / Global				L/GL					L															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.11 D3 Inclusive design

Policy description

This policy supports the delivery of an inclusive environment meeting the needs of all Londoners. The built environment should be safe, accessible and convenient. An inclusive design would improve the quality of life of all Londoners, and especially disabled and older people.

It also supports the preparation of an inclusive design statement as part of the Design and Access Statement. The Design and Access Statement should define the design concept, present the potential impacts on people and communities, highlight the historical context, describe the maintenance and management of inclusion, detail user engagement and ensure accordance of the design with best practice standards and design guidance.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would result in positive effects across a number of social, economic and environmental objectives as it strongly supports accessible and inclusive design to ensure that all communities can safely, easily and independently access opportunities, jobs and services.

The policy explicitly makes reference to the provision of design which provides dignity for all and areas that are convenient and welcoming with no disabling barriers, providing independent access. This is particularly important for lesser mobile communities, including those with a disability or existing health condition, along with buggy users.

The fear of crime can disproportionately affect vulnerable groups, so the implementation of a robust inclusive design policy is integral in reducing this fear and its associated effects, contributing positively to objectives relating to safety and security. This is particularly important in providing opportunities for higher risk groups, including women, LGBTQ and BAME communities, and could help to promote a culture of equality.

This inclusive design policy would also benefit the accessibility and the connectivity objectives as it is expected to increase the access to services and facilities, and the connectivity across London. Accessibility is particularly important in overcoming barriers for groups with lower-mobility. This is likely to help reduce social exclusion and severance, as well as discouraging discriminatory practices more broadly. Providing safe and inclusive environments will also help to improve accessibility and opportunities for vulnerable groups. Improved access to services, open spaces and active travel opportunities could help to improve the health and well-being of communities.

Implementation of the policy is likely to have positive economic benefits as it will contribute to helping to reduce barriers to employment.

Depending on how inclusive design is delivered and maintained, the policy could help to contribute to positive feelings about the local environment, particularly where design is welcoming.

Although not explicitly mentioned in the policy, inclusive design could include good quality green spaces that are accessible to all and that could encourage more exercise and play, which is likely to result in benefits to both mental and physical health and wellbeing in surrounding areas. These inclusive areas could provide tranquil and quiet spaces, diversifying the offer of London's green network.

The policy would have positive effects on the infrastructure objective as it is expected it would support an integrated approach for the inclusive design of all new developments.

Through increased accessibility and inclusivity, the policy would also support cultural activities as it could increase access to social and cultural infrastructure and increase participation among less mobile or disadvantaged groups.

Cumulative

This policy aligns with policies HC1 Heritage conservation and growth, G4 Local green and open space and H12 Housing type mix which support the provision and protection of green spaces and heritage sites, whilst promoting sustainable growth of housing developments. The combined effects of the policies could cause positive economic growth through the provision of sustainable housing design with integrated green spaces.

Recommendations

It was recommended that further information could be provided on the legibility of the built environment, to help accommodate a range of invisible disabilities, including cognitive and sensory impairments. Reference to access and links to and in-between key services and transport infrastructure should be provided.

Affordable transport options and opportunities for lower-income communities should be added to the policy. It was also recommended that further guidance be provided on measures to design out crime and improve safety for lesser mobile and higher risk communities.

GLA response

No major changes were proposed to be made to the draft policy. However, the GLA amended the supporting text to include the words legible and navigable and further guidance in relation to transport infrastructure. A reference to the consideration of links into neighbourhoods was included.

The GLA advised that it was more appropriate to move the emergency evacuation of disabled people information to the fire safety policy.

In relation to crime and safety it is considered that these elements are addressed by other policies within the London Plan.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Post-consultation amendments

Following consultation, a number of amendments have been made to the Policy wording. Further detail has been added to Paragraph 3.3.1 to provide direction as to when inclusive design should be considered within the planning process. The additional text supports the consideration of inclusive design early within a scheme's development, along with setting out requirements for on-going maintenance and

management of developments. The policy supports the use of design codes and master plans to embed the highest standards of design, and ensure the longevity of developments across London. These amendments strengthen the policy narrative surrounding inclusive design, and is likely to result in positive outcomes for equalities groups in ensuring residents have access to the appropriate type of housing and supporting infrastructure.

Further detail has also been added to the supporting policy text specifying that the planning of inclusive design elements of development proposals and statement should be undertaken by, or have input from, a suitably qualified specialist. This could include a member of the National Register of Access Consultants. This additional text has strengthened the overall narrative and credibility surrounding inclusive design, and will improve access for all communities across London. These policy amendments have resulted in revisions to the scoring matrix below.

Table 12: D3 Inclusive design

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						n/a	+		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Direct / Indirect						n/a	I		n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						n/a	P		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L		n/a	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	+	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Medium Term	++	++	+	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Long Term	++	++	+	+	n/a	n/a	++	++	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	+/?	n/a	n/a	n/a	+/?
Direct / Indirect	D	D	I	I	n/a	n/a	D	D	D	D	D	n/a	D	n/a	n/a		n/a	n/a	n/a	D	n/a	n/a	n/a	D
Temporary / Permanent	P	P	P	P	n/a	n/a	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	++	++	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Direct / Indirect	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.12 D4 Housing quality and standards

Policy description

This policy supports innovative and high quality housing design. This would be achieved by supporting the provision of housing with adequate sized rooms and a functional layout. New housing developments should be sustainable and built to meet standards relating to sunlight, storage space, bedspace, headroom and floor area. It also supports the provision of private outdoor space, including gardens and balconies, and seeks to minimise the development of single aspect dwellings.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would result in positive effects on social objectives as it supports the provision of housing across all typologies, including accommodating the needs of older people, children and disabled residents. This could help towards reducing exclusion and promoting an inclusive environment for residents. This would also have very positive effects on health and housing objectives. New housing must conform to building control standards, in addition to the standards set out in this policy, which would help to reduce issues such as homelessness, overcrowding and the risk of ill-health from damp or mould. This policy would also indirectly benefit economic objectives through the provision of sufficient, high quality housing which attracts workers and ensures individuals can both live and work in London.

This policy strongly emphasises the importance of design, including the provision of amenity areas, active frontages and footpaths and links between spaces. Although not explicitly outlined, by encouraging good housing design this policy could contribute to designing out crime, improving safety and the perception of safety in the local area. This policy emphasises the relationship between new residential areas and surrounding developments, including supporting connectivity between spaces and the provision of footpaths, supporting accessibility and connectivity objectives.

This policy would support infrastructure objectives, ensuring the provision of new homes which meet high standards. The standards set out in this policy would also benefit climate change objectives as it considers the need to ensure housing is well ventilated and spacious to address the impact of the heat island effect of London. This would also have important health benefits, especially for more vulnerable groups such as the elderly.

This policy would result in positive effects on environmental objectives. Natural capital and natural environment objectives would benefit through the provision of open space and private outdoor space. This would help protect and enhance local habitats and bring natural elements to the most built up parts of London. The policy supports high quality residential development, with appropriate space standards and layout of rooms. These features would help to mitigate adverse impacts associated with noise.

Cumulative

This policy complements policies H14 Supported and specialised accommodation and G4 Local green and open space which support equality and environmental objectives. Additionally, this policy combined with H14 Supported and specialised accommodation may promote inclusive communities with the provision of amenity areas.

Recommendations

It was recommended that further detail be provided on design interventions that could create safer spaces. It was also recommended that further detail be provided on public transport accessibility and opportunities, underpinning high density development.

Reference to inclusive, accessible and safe spaces that accommodate a range of cognitive and sensory needs was recommended. It was also recommended that waste management and circular economy practices be promoted in the development of new housing.

GLA response

The majority of the policy text did not change significantly, however further details were added referencing a sense of safety and the promoting of recycling practice, noise impacts and coherent layouts

Many of the other recommendations are covered by other aspects of the Plan, particularly density, inclusive design and transport policies.

Appraisal of finalised policy

The finalised policy additionally refers to developments ensuring a sense of safety, resulting in positive effects for crime and safety objectives. Additional text was added referencing the provision of recycling storage and therefore waste management objectives have been made positive.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy provides positive provision for an amount of outdoor space per new dwelling. This has the potential to divert recreational pressure away from European designated sites sensitive to increased recreational pressure.

Post-consultation amendments

Following consultation, additional wording has been added to Paragraph 3.4.5C. This includes reference to inclusive design as a means of improving security, alongside utilising the principles of good design, to prevent the need for gated communities where possible. This additional wording strengthens the policy narrative around inclusive access, high quality urban design and improving security for all communities within London. This policy amendment has resulted in revisions to the scoring matrix below.

Table 13: D4 Housing quality and standards

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	+		n/a	?/+	+	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Medium Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Long Term						+	+		n/a	?/+	++	n/a	n/a	n/a	n/a	n/a	?	n/a	?	+	n/a	O	?	+
Direct / Indirect						I	I/D		n/a	I	D	n/a	n/a	n/a	n/a	n/a	I/D	n/a	I/D	D	n/a	I	I/D	I/D
Temporary / Permanent						T/P	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	P	n/a	P	T/P	P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	L	n/a	L	L	n/a	L	L	L
EQIA																								
Short Term	+	+	+	+	+	?	O	+	O	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Medium Term	+	+	+	+	+	?	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Long Term	++	+	+	++	+	+	+	+	+	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	+
Direct / Indirect	I	I	I	D	D	I	I/D	I/D	I/D	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Medium Term	+	+	+		+				n/a	n/a				n/a	+		?	n/a		+	n/a	n/a		+
Long Term	+	+	++		++				n/a	n/a				n/a	++		?	n/a		+	n/a	n/a		+
Direct / Indirect	I	I	D		I				n/a	n/a				n/a	I/D		I/D	n/a		D	n/a	n/a		I/D
Temporary / Permanent	T/P	T/P	I		T				n/a	n/a				n/a	T/P		T/P	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	T/ P		L				n/a	n/a				n/a	L		L	n/a		L	n/a	n/a		L
CSIA																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/ GL					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.13 D5 Accessible housing

Policy description

The policy supports the provision of suitable housing, and genuine choice, to accommodate London's diverse population. This includes lesser mobile residents, older people, and families with young children.

Specifically, the policy intends to ensure that 10% all of new residential developments will be designed for wheelchair users, and the remainder meet the standards of the Building Regulations that define accessible and inclusive housing.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy will ensure appropriate design measures and inclusive access to allow all Londoners to live in a dignified and independent manner.

The policy supports the provision of accessible and adaptable dwellings, which will help in ensuring that all Londoners are able to live in appropriate accommodation. This is particularly important in meeting the needs of lesser mobile communities, older people, and residents with a disability or existing health condition, including cognitive and sensory impairments. This could play an important role in overcoming discriminatory practices, and encouraging equal opportunities for all residents.

The ability to move and live comfortably is likely to play a role in expanding opportunities for all communities, and improving overall health and wellbeing, and likelihood of participating in city life. This would have tangible benefits for many demographic groups, particularly older people and those with young children. Appropriately designed housing could improve the safety and security of residents, and encourage greater community integration and access to services.

Cumulative

This policy aligns with policies S2 Health and social care facilities, G4 Local green and open space and HC1 Heritage conservation and growth which support local amenities to all Londoner's which could create a more inclusive society and reduced level of poverty.

Recommendations

It was recommended that the definition of inclusive access could be expanded to include legibility of the development and surrounding area. This is particularly important in assisting residents with 'invisible' disabilities, such as those with cognitive or sensory impairments, in manoeuvring the built environment. Further detail could also be provided on how existing dwellings can be retrofitted to meet this policy criteria, including reference to supporting transport links and access to services.

GLA response

The GLA advised other policies within the Plan such as Inclusive Design and Public Realm addressed issues of legibility and other inclusive / accessibility recommendations. In addition, the GLA clarified that DCLG Housing Standards Review does not allow for standards other than those contained in the optional building regulations.

The GLA also advised that this policy was only applicable to new development or where there is an application for redevelopment, therefore retrofitting of existing development was not appropriate.

No major changes were made to the draft policy, although minor wording amendments were made to the supporting text to provide further clarity.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, amendments have been made to Part A of the policy. This includes the removal of the 'new build' element of the policy, broadening the application of Policy D5 to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies. Further supporting text in Paragraph 3.5.1 clarifies that, at the time of publication, the Plan generally limits the application of this policy to new build dwellings. It is considered that this amendment to the policy wording strengthens the narrative surrounding inclusive communities, by supporting adequate, appropriate and accessible housing of existing communities as well as new build dwellings. This is likely to better meet the diverse housing needs of the population, and reduce inequality and disadvantage. This policy amendment has resulted in revisions to the scoring matrix below.

Table 14: D5 Accessible Housing

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						?	n/a			n/a	n/a	+	n/a	n/a	n/a	O	n/a	?	n/a	n/a	n/a	n/a	O	n/a	+
Medium Term						?	n/n			n/n	n/n	+	n/n	n/n	+	n/n	?	n/n	n/n	n/n	n/n	O	n/n	+	
Long Term						?	n/a			n/a	n/a	+	n/a	n/a	+	n/a	?	n/a	n/a	n/a	n/a	O	n/a	+	
Direct / Indirect						I	n/a			n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	I	n/a	n/a	n/a	I	n/a	I	
Temporary / Permanent						T/P	n/a			n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	P	n/a	T/P	
Local / Greater London / Wider Region / Global						L/GL	n/a			n/a	n/a	L/GL	n/a	n/a	n/a	L/GL/W	n/a	L	n/a	n/a	n/a	L	n/a	L	
EQIA																									
Short Term	+	+	?	?	+	?	?	?	?	n/a	?	n/a	n/a	n/a	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Medium Term	+	+	?	?	+	?	+	+	+	n/n	+	n/n	n/n	n/n	+		n/n	n/n	n/n	n/n	n/n	n/n	n/n	n/n	
Long Term	++	+	+	+	++	?	+	+	+	n/a	+	n/a	n/a	n/a	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Direct / Indirect	D	D	I	I	D	I	I	I/D	I/D	n/a	I/D	n/a	n/a	n/a	I		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a	n/a	L/GL/W		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
HIA																									
Short Term	n/a	n/a	+		+					n/a	n/a				n/a	O		?	n/a		n/a	n/a	n/a	+	
Medium Term	n/n	n/n	+		+					n/n	n/n				n/n	+		?	n/n		n/n	n/n	n/n	+	
Long Term	n/a	n/a	+		++					n/a	n/a				n/a	+		?	n/a		n/a	n/a	n/a	+	
Direct / Indirect	n/a	n/a	I		D					n/a	n/a				n/a	I		I	n/a		n/a	n/a	n/a	I	
Temporary / Permanent	n/a	n/a	T		P					n/a	n/a				n/a	T/P		T/P	n/a		n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		L/GL					n/a	n/a				n/a	L/GL/W		L	n/a		n/a	n/a	n/a	L	
CSIA																									
Short Term				+						n/a															
Medium Term				+						n/n															
Long Term				+						n/a															
Direct / Indirect				D						n/a															
Temporary / Permanent				T						n/a															
Local / Greater London / Wider Region / Global				L/GL						n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To conserve London's geodiversity and protect soils from development and over intensive use.
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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.14 D7 Public Realm

Policy description

This policy aims to ensure that the public realm is safe, accessible, inclusive, attractive, connected and easy to maintain. Public realm should also have regard to the historic and natural context of surrounding areas, and ensure high quality design.

Initial appraisal and recommendations

Integrated impact assessment

Implementation of this policy is likely to promote social integration and community cohesion as it provides space for activities such as relaxation, physical activity and social events. This policy would positively affect accessibility and equality objectives as it has specific reference to inclusive design. Inclusive public spaces are particularly important in ensuring lesser mobile communities, wheelchair and buggy users are able to access opportunities, and participate within the community.

This policy also encourages a mutually supportive relationship between public spaces and their surroundings, which positively affects the area by providing good links between places. Additionally, greater emphasis on the relationship between public spaces and their context would benefit local built and cultural heritage, by encouraging change which is sensitive to key aspects of the local area.

With the implementation this policy, new public places should incorporate landscaping and planting which would contribute to enhancing the townscape character. Additional landscaping and permeable surfaces would also contribute toward Sustainable Urban Drainage Systems, which would increase resilience to flooding, as well as alleviate the Urban Heat Island effect. Furthermore, careful landscaping would have ecological benefits and increase biodiversity in the immediate area, and thus increase public access to nature. Altogether, this would increase London's resilience to the effects of climate change.

This policy would have positive effects on crime and security as it emphasises the relationship between the public realm and surrounding buildings, and prioritises natural surveillance in developments in view of the public realm. In addition, the promotion of safe and inclusive public spaces, such as through safe crossings on the local transport network, would encourage active travel. Creating a safe and attractive environment would encourage people to use more sustainable forms of travel, which could reduce vehicle traffic.

Increasing levels of active travel would have beneficial health effects locally through increased levels of exercise as well as decreased levels of transport related air pollution and noise emissions. This benefit is further supported by the policy's support for play and social areas.

Cumulative

This policy aligns with policies G7 Trees and woodland, G5 Urban greening, S1 Developing London's social infrastructure, HC1 Heritage conservation and growth and HC2 World heritage sites which support the provision of a London environment with health and wellbeing in mind. Additionally, the combination of these policies may create inclusive communities which actively influence health and wellbeing.

Recommendations

This policy could reference the role of public space in supporting higher density development and encouraging localised regeneration, use of public or active transport modes, and measures to improve

ease of movement around the built environment and to wider networks. Improved legibility is particularly important for residents with cognitive and sensory impairments. It was also suggested that reference to safety measures, including lighting and design measures, could be further detailed. Safety in public spaces is particularly important for higher risk groups, such as religious and ethnic minority groups, women and LGBTQ communities to ensure they feel able to participate in opportunities.

More information on the actions to be taken to support climate change resilience could be provided. Beyond open and green spaces, this policy could encourage biodiversity in other public realm spaces, such as through green infrastructure. Further detail on how the policy could maximise active travel and support the reduction of transport related emissions could also be provided.

GLA response

The GLA clarified the policy to show the relationship to sustainable development and active travel, and its importance in higher density development. Further text was added to the supporting text to provide more specific wording on safety and security, lighting, legibility, connectivity, and ease of movement.

However the GLA advised that policies around sustainable drainage, urban greening, air quality etc. providing more detail in regards to climate change resilience.

Appraisal of finalised policy

No further appraisal required as the changes made to the policy do not materially change the policy's impacts, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Post-consultation amendments

Following consultation, a number of amendments have been made to the Policy wording. Additional wording was added to part D of the policy, specifying that the placement of street crossings should be regular, convenient and accessible. This strengthens the policy narrative around inclusive access, and improving connectivity for pedestrians.

Wording amendments were also made to Part I of the policy, surrounding the role of street furniture within the urban realm. This includes clarification around the removal of street furniture that is poorly located, unsightly, in poor condition or without clear function, to improve pedestrian amenity. Additional wording was added to specify that consideration should be given to the use, design and location of street furniture so that it complements the use and function of space. These amendments strengthen the narrative surrounding high quality street design, and support inclusive access for pedestrians. This is likely to encourage communities to better use the public realm, which could encourage more active lifestyles.

Further wording amendments were made to Paragraph 3.7.11 in the supporting text. This includes clarifying the provision of accessible free drinking water fountains to improve public health and reduce waste from single-use plastic bottles. The addition of the word 'accessible' strengthens the narrative surrounding inclusive access, and ensures that all communities in London can benefit from infrastructure and services.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 15: D7 Public realm

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	+		O	n/a	n/a	n/a	n/a	O	O	O	n/a	O	O	+	O	+	n/a	n/a
Medium Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Long Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	n/a
Direct / Indirect						I	I/D		I/D	n/a	n/a	n/a	n/a	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L/GL/W	L	n/a	L/GL	L/GL	L	L	L	n/a	n/a
EQIA																								
Short Term	+	+	+	O	n/a	?	+	+	+	n/a	O	n/a	n/a	O	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	O	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Long Term	++	++	++	+	n/a	+	+	+	+	n/a	+	n/a	n/a	+	n/a		n/a	n/a	n/a	+	+	n/a	n/a	n/a
Direct / Indirect	D	D	D	D	n/a	I	I	I	I	n/a	D	n/a	n/a	I	n/a		n/a	n/a	n/a	I	I	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	n/a	n/a	L/GL	n/a		n/a	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				+	n/a				O	+		n/a	n/a		+	n/a	n/a		n/a
Medium Term	+	+	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Long Term	+	+	+		n/a				+	n/a				+	+		n/a	n/a		+	n/a	n/a		n/a
Direct / Indirect	I/D	I/D	I/D		n/a				D	n/a				I/D	I/D		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				T/P	n/a				T/P	T/P		n/a	n/a		T/P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W		n/a				L/GL	n/a				L	L		n/a	n/a		L	n/a	n/a		n/a
CSIA																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.15 H1 Increasing housing supply

Policy description

This policy supports the delivery of a range of housing and mixed-use developments to meet ambitious housing delivery targets across the London Strategic Housing Market Area. The policy identifies ten-year targets for net housing completions for each local planning authority, who are responsible for identifying delivery options through the Local Plan process. In order to achieve these targets, the policy encourages boroughs to prepare delivery-focused Development Plans, with a strong emphasis on monitoring and updating housing trajectories on an annual basis. Significant emphasis is placed on exploring opportunities to optimise suitable and available brownfield development, and using proactive measures to overcome constraints to delivery. This includes targeted infrastructure investment to reduce risks and unlock development opportunities, and encouraging increased diversification in the house building industry.

Where new transport infrastructure is planned, the policy supports that's local planning authorities should take into account future public transport capacity and connectivity levels. This will increase opportunities to optimise site capacity and meet housing targets through increased densities.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy supports a range of interventions to unlock development, and will help to facilitate the delivery of much needed housing across the capital. The emphasis on redeveloping brownfield sites, promoting small sites, intensification and renewal will help to ensure site capacity is optimised to help meet delivery targets. This will encourage local planning authorities to make the best use of existing land resources, and promote sustainable development patterns more broadly.

This policy is likely to improve accessibility as it promotes high density development on well-connected land, and in areas with high Public Transport Accessibility Levels. Optimising housing delivery around existing and future transport infrastructure schemes can improve access to services and encourage more sustainable modes of transport. This is particularly important in positively contributing to wider air quality, environmental and health objectives.

Measure to support housing delivery can have a number of wider economic benefits, including maintaining the balance of housing and employment across the city. The provision of high quality, housing would contribute to London's economic competitiveness by enhancing the attractiveness of the city as a place to work and live. In addition, well connected residential development can help to prevent unsustainable commuting patterns, and improve access to employment opportunities. There is a strong emphasis on promoting small house builders and tackling the construction skills gap, which could encourage training and job creation within the construction industry. More broadly, the policy supports mixed-used development, town centre renewal and regeneration, which would support a range of economic benefits and opportunities.

Cumulative

This policy aligns with policies E11 Sector growth opportunities and spatial clusters and D2 Delivering good design which support the delivery of high quality designs and growth of sectors such as construction. This policy may provide growth opportunities; however, it needs to work in conjunction with schemes which provide buyers and tenants of a new supply of housing.

Recommendations

The policy could provide further reference to delivering housing to meet a range of needs, including affordable, adaptable and accessible units. This would particularly support the needs of lower-income communities, and residents with a disability or existing health condition. Additionally, the policy could further detail the role of cross-boundary delivery which can play an important role for constrained boroughs. In relation to increasing the density of development, additional detail could be provided on the supporting infrastructure required to underpin growth. This could include proximity to schools, health centres, public and active transport infrastructure and open space. The policy could also provide reference to high quality design and layout of development in order to mitigate potentially adverse impacts associated with high density, mixed-use development.

The policy could explicitly reference measures to protect communities from adverse impacts associated with disruption, fragmentation and displacement pressure. This could include managing demolition and intensification in a way that does not undermine the security or amenity of residents, and protecting tenancies by ensuring residents have the right to return.

GLA response

The GLA clarified that issues surrounding affordable and accessible housing, along with infrastructure provision and design were covered sufficiently in separate housing policies, including H5 Delivering Affordable Housing, H13 Housing Mix, and D5 Accessible Housing. The intention is for the Plan to be read as a whole, and therefore it is not considered necessary to cross-reference to other housing and infrastructure policies. As a result, no changes were proposed to be made to the draft policy, although minor changes to the text were made to the supporting text.

The GLA also confirmed that housing targets are based on the capacity of individual boroughs and therefore reflects the constraints different boroughs face.

Appraisal of finalised policy

No further appraisal is required as there are no proposed changes to the draft policy.

Implications for the HRA

Outcome of HRA screening showed the potential for likely significant effects. The quantum of growth provided does have the potential to result in locally significant effects upon European designated sites, although this is dependent on the ultimate location of the development.

This policy is therefore a main aspect for discussion in the HRA report itself.

Post-consultation amendments

The consultation responses raised a number of issues surrounding the potential for disruption and displacement pressures associated with the large scale development of new housing across London. If not managed and regulated appropriately, this could have adverse impacts on the amenity, security and cohesion of communities. It was also noted that the scale of development could have impacts on the environment. The more intensive use of land and construction activity associated with this policy could result in adverse impacts.

The consultation response has resulted in revisions to the scoring matrix below. A recommendation to the GLA was also included suggesting the Policy could explicitly reference measures to protect communities from adverse impacts associated with disruption, fragmentation and displacement pressure.

The GLA responded that Policy H1 addressed issues of overall housing targets and identifying different types of land that could help meet housing need, and as the Plan should be read as a whole there were other policies that picked up this issues.

Table 16: H1 Increasing housing supply

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						+	+		?	+	O	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Medium Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Long Term						+	+		?	+	+	n/a	n/a	?	n/a	?	n/a	n/a	n/a	n/a	?/-	n/a	+	n/a	n/a
Direct / Indirect						D	D		I	D	I	n/a	n/a	I	n/a	I	n/a	n/a	n/a	I	n/a	D	n/a	n/a	
Temporary / Permanent						T/P	P		T/P	P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	P	n/a	n/a	
Local / Greater London / Wider Region / Global						L/GL	L/GL		L	L/GL	L/GL	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	L	n/a	n/a	
EQIA																									
Short Term	?	?	+	n/a	+	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Medium Term	?/+	?/+	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Long Term	+	+	+	n/a	++	+/?	?	+	?	+/?	?	n/a	n/a	?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Direct / Indirect	I/D	I/D	I/D	n/a	D	D	I/D	I/D	I/D	I/D	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	L	L	L/GL	n/a	L/GL/W	L/GL	L	L	L	L	L/GL	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
HIA																									
Short Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	n/a	n/a	+		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	n/a	n/a	I/D		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		L/GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
CSIA																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.16 H2 Small sites

Policy description

This policy supports the delivery of well-designed housing on small sites, encouraging this delivery mechanism to make a greater contribution to the overall housing supply of the city. A key aspect of this policy is to support small and medium house builders, as means of diversifying the approach to housing delivery, and helping to increase certainty within the development process. To meet a range of housing needs and ambitious delivery targets, the policy supports incremental intensification of small sites, to optimise land capacity and accommodate affordable housing contributions. The policy asserts that boroughs should identify appropriate locations to accommodate additional housing provision, promote good design and deliver on the small site targets. However, development should not give rise to an unacceptable level of harm to residential privacy, designated assets, or biodiversity.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy strongly supports the role of small sites in contributing to overall housing delivery, and proactively encourage measures to unlock small parcels of land. The policy also strongly supports using small sites to secure affordable housing contributions, and making provision for adaptable and accessible units. This can have a number of positive impacts for communities, helping to increase access to housing, reduce homelessness and overcrowding, and helping to meet the needs of lesser mobile communities. It is however noted that there could be the potential for resident displacement associated with the demolition and intensification of buildings. If not managed appropriately, this could have adverse impacts on the security of residents and cause fragmentation and disruption to existing communities.

This policy would also have positive effects in terms of sustainability and wider place-making. There is a strong emphasis placed on high quality design and encouraging mixed-used development. The redevelopment of brownfield sites for housing and mixed use development can stimulate wider regenerative impacts, and promote sustainable development patterns by optimising site capacity.

This policy encourages high density development on small sites in well-connected locations, particularly areas with a high Public Transport Accessibility Level (PTAL). This could help to ensure housing is delivered in appropriate locations, with good access to services and opportunities for active travel. There is particular emphasis on unlocking small site developments in accessible parts of outer London, to help address housing needs and capitalise on existing transport infrastructure.

Alleviating housing pressures through a range of delivery mechanisms can have a number of positive effects on the economic competitiveness of London. Meeting housing demands can help to maintain the attractiveness of London as a place to work and live, and can improve access to employment opportunities. In addition, bringing forward small development sites can play a role in supporting small and medium construction businesses, who may not have the capacity to work on major developments.

It is also expected that this policy would have positive effects on the natural environment by ensuring all new development makes a contribution to open space and green infrastructure provision, and mitigates the loss of any green spaces appropriately. The development of small sites could however increase risks of flooding if not managed appropriately.

Cumulative

This policy complements policies SD6 Town centres - strategy, D7 Public realm and G4 Local green and open space which support the protection of the environment through small developments and creating a public realm which increases health and wellbeing. This policy may conflict with SD1 Opportunity Areas which support large scale new developments within growth areas across London that may take a significant proportion of land.

Recommendations

The policy could provide further information on communal spaces and public realm underpinning small site housing development. This would help to encourage a sense of community and amenity value in relatively small schemes. It could also provide further detail on the accompanying physical and social infrastructure, in addition to transport, that could help to mitigate adverse impacts of high density development.

Additional detail could be provided to evidence how small and medium sized house builders could be supported within the market, including reference to training, partnership working and overcoming challenges surrounding the viability and speed of delivery.

The policy could explicitly reference the measures in places to prevent displacement associated with the demolition and intensification of buildings.

The policy could make reference to the impact of small sites on flooding, and how potentially adverse impacts could be mitigated.

GLA response

The GLA advised that design codes developed by boroughs would deal with issues such as communal spaces within small developments for example. The GLA advised that other policies with the Plan addressed issues such as social infrastructure and active travel. The GLA also advised that additional measures to help small and medium sized house builders is set out the Mayor's Housing Strategy

Appraisal of finalised policy

The implementation of the finalised Policy would have positive effects on the provision of environment, social and physical infrastructure. It would also contribute in reducing the emissions, help tackling climate change, promote the enjoyment and benefits of the natural environment, and promote the use of brownfield sites.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy does not add to the overall housing quantum identified in Policy H1.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. An additional clause has been added to the policy, setting out that small housing developments must meet the minimum standards for private internal space and private outside space, meet minimum cycle parking standards, not exceed maximum residential parking standards and accord with Agent of Change principles and Policy HC7 on public houses. The additional policy text also sets out that where small

housing developments are classified as major developments, they must meet the Air Quality Neutral benchmark for building emissions, by using ultra-low NOx boilers or other less polluting technologies.

An additional clause has been added to the policy from the supporting text, stating that minor developments should achieve no net loss of overall green cover and major developments should contribute to urban greening in line with Policy G5 and the Urban Greening Factor. This text was moved to the main policy to provide greater clarity and weight. It strengthens the policy narrative surrounding enhancing London's natural capital, and is likely to support positive health and environmental outcomes.

A further clause has been added to the policy text, setting out that small housing developments that demonstrably fail to optimise potential housing delivery on a site, or prejudice the more comprehensive development of a site allocation, should not benefit from the presumption in favour of development, unless there is a clear justification. Small developments should be designed to facilitate adjacent sites to come forward in the future. This additional text strengthens the policy narrative surrounding making the best and most efficient use of land, and maximising opportunities for housing. This is likely to have positive outcomes for increasing the housing supply across London.

Additional text was also added to Paragraph 4.2.7 setting out that boroughs are encouraged to explore opportunities for small housing developments in conservation areas where these will complement and enhance the area. The text supports well-designed new housing in making a positive contribution to the special character of conservation areas. This also applies to small sites in the setting of other heritage assets such as listed buildings. Similarly, further text was added to Paragraph 4.2.8 of the supporting text, stating that boroughs should promote well-designed small housing developments which respond positively to local character and the opportunity to accommodate additional housing on a particular site. This includes that boroughs should not refuse applications because of a conflict with local policies where these policies are inconsistent with Policy H2 and pre-date the publication of the London Plan.

These amendments strengthen the policy narrative surrounding protecting and enhancing the historic environment, and support a proactive approach to sensitive and appropriate residential development in these areas. This is likely to increase the supply of housing, and help respond to housing needs across London. The text also provides clarity on the policy hierarchy, and that the London Plan should take priority over local policies that may frustrate or hinder the delivery of Policy H2.

Further text within Paragraph 4.2.7A states that specialist housing for older people that is in Class C3 use can benefit from the presumption in favour of small sites, where the requirements of Policies H2D to H2K are met. This is likely to have a range of beneficial outcomes by ensuring small sites cater to a broad range of housing needs, and support diverse and inclusive communities.

A new paragraph has also been added to the supporting policy text, following Paragraph 4.2.8. This states that where existing houses are redeveloped or subdivided, boroughs may require the provision of family sized units, providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement. This clarifies that family homes could be secured through redevelopment, providing sufficient flexibility is provided to enlarge an existing building footprint. This strengthens the policy in terms of inclusivity by supporting flexibility of design to cater to larger family housing.

Wording amendments have also been made to Paragraph 4.2.9 of the supporting text. This clarifies that the principle of no net loss of biodiversity and green space can be met through off-site provision where site constraints mean that it cannot be achieved on site. Any off-site provision must be secured robustly, for example through a cash in lieu payment to the borough to contribute towards localised urban greening projects which provide net additional green cover. This strengthens the policy narrative surrounding preserving and enhancing natural capital within London, and is likely to support positive health and environmental outcomes in the long run.

The consultation responses raised concerns that the appraisal does not fully consider equalities considerations, such as the requirements for participation from local communities, requirements to replace like for like housing, requirements to protect tenancies and the right to return, and safeguards put in place to manage displacement. If not managed appropriately, the demolition and intensification of buildings, along with piecemeal development could have adverse impacts on the security of residents and cause disruption and fragmentation of existing communities.

These policy amendments and consultation responses have resulted in revisions to the scoring matrix below.

Table 17: H2 Small sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	?/-	O	O	+	n/a	n/a
Medium Term						+	+		+	+	+	n/a	n/a	+	n/a	+	n/a	n/a	?/-	+/?	+/?	+	n/a	n/a
Long Term						++	+		+	+	++	n/a	n/a	++	n/a	+	n/a	n/a	?/-	+	+	+	n/a	n/a
Direct / Indirect						D	I/D		I	D	I	n/a	n/a	I	n/a	I	n/a	n/a	I/D	I/D	I/D	D	n/a	n/a
Temporary / Permanent						T/P	T/P		T/P	P	T/P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L		L	L/GL	L/GL	n/a	n/a	L	n/a	L	n/a	n/a	L	L	L	L/GL	n/a	n/a
EQIA																								
Short Term	?	?/-	?/-	n/a	+	+	+/?	+	+	+/?	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term	+/?	+/?	?/+	n/a	+	+	+	+	+	+/?	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term	+	+	+/?	n/a	++	+	+	+	+	+/?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I/D	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	?		+					n/a	n/a			n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Medium Term	n/a	n/a	?		+					n/a	n/a			n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Long Term	n/a	n/a	+/?		+					n/a	n/a			n/a	n/a		n/a	n/a		O	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		D					n/a	n/a			n/a	n/a		n/a	n/a		D	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		P					n/a	n/a			n/a	n/a		n/a	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/GL					n/a	n/a			n/a	n/a		n/a	n/a		L	n/a	n/a		n/a
CSIA																								
Short Term				n/a						n/a														
Medium Term				n/a						n/a														
Long Term				n/a						n/a														
Direct / Indirect				n/a						n/a														
Temporary / Permanent				n/a						n/a														
Local / Greater London / Wider Region / Global				n/a						n/a														

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
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- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.17 H6 Threshold approach to applications

Policy description

This policy aims to maximise the delivery of affordable housing, using a threshold approach to large development proposals. These thresholds apply on developments that include the delivery of more than ten units or a combined floor space greater than 1,000m². The policy recognises the role public sector land can play in meeting affordable housing need, and supports the use of public grants and the efficient use of available resources to achieve this outcome.

The policy supports a Fast Track Route of the threshold approach for applicants who meet or exceed relevant threshold level of affordable housing, are consistent with relevant tenure split, and meet all other relevant Policy requirements. Fast track applicants are not required to provide a viability assessment at the application stage.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would support the delivery of much needed affordable housing across London, through setting out a consistent and transparent approach to viable delivery models. The policy will contribute to improving developer certainty by standardising the approach to viability assessments, and encouraging greater transparency in the contributions required. This includes putting in place viability review mechanisms to align affordability delivery with potential improvements in viability throughout the development period.

A more certain and viable approach to affordable housing delivery could help to maximise provision across new developments and help meet the housing needs of all Londoners. This could result in a number of positive outcomes, particularly in terms of improving access to housing for lower-income communities along with encouraging diverse and inclusive communities. The policy emphasises the importance of meeting a range of affordable housing needs, including making provision for family-sized homes.

Affordable housing delivery can also have a number of economic benefits. The lack of affordability in the housing market can act as a significant barrier to employment, as people cannot afford to live and work in the city. Sufficient provision of affordable housing can therefore help to retain labour in the capital, particularly in key public service areas and lower skilled employment.

Cumulative

This policy complements policies H7 Affordable housing tenure, D7 Public realm and D10 Safety, security and resilience which support the delivery of affordable housing and the fast-tracked provision of accommodation to meet London's needs.

Recommendations

The policy could provide a clear definition of affordable housing, particularly as the Government and charities such as Shelter each have slightly differing definitions. In addition to this, it is likely the definition of affordability in London would vary when compared to the rest of the country.

Further reference could be made to the trade-offs associated with delivering affordable housing, particularly in relation to the release of SIL and potential loss of lower skilled jobs. Further detail could

also be provided on the quality and design of housing, along with expectations surrounding transport access and service provision associated with delivery.

GLA response

The GLA clarified that issues relating to the trades off associated with the release of SIL, and details surrounding what is considered acceptable for release are covered in the economy policies. It was noted that further details surrounding design, social infrastructure provision health and definitions of affordable housing were also covered elsewhere in the Plan. As a result, no changes were proposed to be made to the draft policy, although minor amendments were made to the supporting text.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording and supporting text. An additional paragraph has been added to the supporting text, setting out that in some circumstances it may be impractical or unsuitable to provide on-site affordable housing with the relevant tenure split on small housing developments. In instances housing providers cannot absorb a small number of affordable homes into their portfolio, for example where servicing and management costs would exceed plausible income from service charges. This means that in order to reduce servicing and management costs, affordable housing can be provided in a single affordable tenure, such as all privately owned, privately rented or socially rented.

In addition, a new paragraph has been added after Policy 4.6.6 of the supporting text, setting out boroughs may permit small housing developments to access the Fast Track Route where on-site affordable housing is provided in a single affordable housing tenure to the satisfaction of the borough. Where there is no demand from affordable housing providers for a small number of affordable homes, either where provided as a mix of affordable tenures or in a single affordable housing tenure, boroughs may permit small housing developments to access the Fast Track Route where the relevant threshold is met off-site or as an in-lieu payment. Boroughs are encouraged to set out their approach to affordable housing requirements on small housing developments.

These new paragraphs sets out the circumstances where a borough may accept either off-site or in lieu payments, or mono-tenure contributions on small sites, and aligns with the proposed amendment to H6C3 and H6C4. The amendment strengthens the narrative surrounding overcoming viability challenges in the provision of affordable housing, particularly on small sites. Although the policy supports the increased provision of affordable housing, which will have a range of beneficial health and social outcomes, the amendments surrounding mono-tenure development could serve to undermine the mixed-use nature of neighbourhoods.

Paragraph 4.16.3 of the supporting text has been deleted to improve clarity surrounding whether boroughs can set local thresholds below 35% in Opportunity Areas, and to fully align with the Housing SPG. These policy amendment have resulted in revisions to the scoring matrix below.

Table 18: H6 Threshold approach to applications

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						+	n/a		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term						+	n/a		n/a	+	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term						+	n/a		n/a	+	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect						I	n/a		n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	n/a		n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
EQIA																									
Short Term	+	+	+	n/a	+	+	+/?	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Medium Term	+	+	+	n/a	+	+	+/?	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Long Term	+	+	+	n/a	++	+	+/?	n/a	n/a	+	++	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?
Direct / Indirect	D	D	D	n/a	D	I/D	I	n/a	n/a	I	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	P	P	P	n/a	P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	L/ GL	L	L	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA																									
Short Term	n/a	n/a	+		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	?
Medium Term	n/a	n/a	+		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	?
Long Term	n/a	n/a	+		++				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	?
Direct / Indirect	n/a	n/a	I		D				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/ GL				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	L
CSIA																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.18 H7 Affordable housing tenure

Policy description

The policy supports the delivery of genuinely affordable housing by providing a minimum of 30% low cost rented homes, a minimum of 30% intermediate products and 40% to be determined by the relevant borough. This includes the consideration of annual housing costs, capped at a percentage of income. The tenure splits should provide sufficient flexibility to be tailored to meet local needs, with boroughs setting other eligibility criteria where appropriate.

The policy also supports the use of the Fast Track Route for schemes delivering the threshold level of affordable housing.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy recognises the need for low cost housing in the capital, and supports a range of affordable options delivered as part of new developments. This includes provision for low cost rental housing and intermediate home ownership, which will help overcome existing barriers faced in accessing the housing market. The provision of a range of affordable accommodation would help to ensure that London's housing market meets a diverse range of needs, by supporting mixed-use and inclusive communities. More specifically, this policy could accommodate the needs of lower-income households, and support the transition to home ownership for residents across the city more broadly. High quality housing can play a role in improving the safety, health and security of particularly sensitive communities.

The policy emphasises the flexibility required to tailor housing needs according to Borough characteristics and identified shortfalls. The sufficient provision, and appropriate targeting, of affordable housing can help to address a range of challenges, including overcoming barriers to employment, improving health outcomes and tackling overcrowding. Maintaining affordability in the housing market can also have a number of economic benefits for London as a whole. This could include helping to retain labour in the capital, and improving the city's attractiveness as a place to live and work.

Cumulative

This policy complements policies D7 Public realm and D10 Safety, security and resilience and H13 Build to rent which support the delivery of affordable housing and the provision of accommodation in the long and short term to meet London's needs.

Recommendations

The policy could provide further information on inclusive, accessible and adaptable affordable housing options, to ensure all communities can benefit from these housing opportunities. This would particularly support the needs of lesser mobile and older residents in accessing affordable, high quality housing. Further detail could also be provided on infrastructure provision supporting affordable housing delivery, such as access to public transport, services and employment locations.

The regenerative potential of high quality affordable housing could also be further explored, particularly in relation to public realm, job creation, and the re-use of brownfield land.

GLA response

The GLA clarified that issues relating to infrastructure, inclusive design and quality of affordable housing are covered elsewhere in the Plan. The GLA advised that Chapter 1 of the draft London Plan set out the regenerative potential of high quality affordable housing, including associated benefits around job creation and the re-use of brownfield land. As a result, no changes were proposed to be made to the draft policy, although minor amendments were made to the supporting text.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added to Paragraph 4.7.3 of the supporting text, clarifying that the Mayor is committed to delivering genuinely affordable housing. This includes specifying that the Mayor's preferred affordable housing tenures are homes based on social rent levels, including Social Rent, alongside London Affordable Rent.

This clarification emphasises the preference for Social Rent as the preferred affordable housing product, and strengthens the policy narrative surrounding inclusive communities and addressing the diverse housing needs of London's population.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 19: H7 Affordable housing tenure

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						?	n/a			n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a			n/a	I	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						T/P	n/a			n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	n/a			n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EQIA																									
Short Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	+	+	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	+	n/a	++	+	++	n/a	n/a	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	D	I/D	I/D	n/a	n/a	I	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/ GL	L/ GL	L	n/a	n/a	L/ GL	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																									
Short Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+		+				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+		++				n/a	n/a				n/a	n/a		+	n/a		n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		D				n/a	n/a				n/a	n/a		I	n/a		n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		P				n/a	n/a				n/a	n/a		T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		L/ GL				n/a	n/a				n/a	n/a		L/ GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a
CSIA																									
Short Term				n/a					n/a																
Medium Term				n/a					n/a																
Long Term				n/a					n/a																
Direct / Indirect				n/a					n/a																
Temporary / Permanent				n/a					n/a																
Local / Greater London / Wider Region / Global				n/a					n/a																

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.19 H9 Vacant building credit

Policy description

This policy supports the appropriate management of vacant building credit, to ensure it contributes to development needs and does not undermine affordable housing provision. The policy sets out the limited circumstances where the Vacant Building Credit (VBC) should be applied, to provide an incentive for brownfield development on sites containing vacant buildings that would not otherwise come forward for development.

Applicants are required to demonstrate that the building has been vacant for a continuous period of five years, and provide evidence the site has been actively marketed for at least two of the five years. The VBC is not anticipated to bring forward significant levels of additional development in London, and could have long term implications for the delivery of affordable housing.

Initial appraisal and recommendations

Social, economic and environmental effects

The appropriate implementation of this policy would result in the sustainable development of brownfield land, bringing back into use other vacant uses. This could contribute to the overall stock of housing, and provide a range of uses on previously unoccupied land.

In the limited instances where the VBC should be applied, it could have adverse impacts on affordable housing by reducing the requirements for contributions based on the amount of vacant floor space brought back into use. The policy acknowledges the implications the VBC could have on affordable housing provision, and therefore encourages decision-makers to consider local and strategic needs for affordable housing, and alternative viability procedures.

By limiting the application of the VBC, the policy could support the appropriate management of vacant building credit to ensure it contributes to development needs and does not undermine affordable housing provision. This would encourage a housing market that meets a range of needs and supports diverse and inclusive communities.

The redevelopment of vacant buildings could support wider placemaking objectives, encouraging lighting, public realm and the presence of people throughout the day and night, in previously unoccupied areas. This could help to improve perceptions of an area, stimulate regenerative activity, and could play a role in reducing crime. Safe neighbourhoods are particularly important for higher risks groups, including women, ethnic minority and religious groups, and LGBTQ communities, to ensure all residents feel comfortable and able to participate in public spaces.

The sustainable re-use of existing buildings also broadly promotes the principles of the circular economy, and encourages efficient use of finite land resources.

Cumulative

This policy complements policies SI2 Minimising greenhouse gas emissions, G4 Local green and open space and H11 Ensuring the best use of stock which support the redevelopment of brownfield sites and the protection of surrounding greenfield sites.

Recommendations

It was recommended that further information could be provided on the supporting infrastructure to underpin the redevelopment of vacant uses, and connect residents to key services. This includes

reference to a range of accessible and adaptable uses to support the needs of lesser mobile residents and older people. The regenerative role of brownfield development and re-use of vacant buildings could be explored further.

GLA response

The GLA advised the issues recommended are addressed elsewhere in the Plan. Therefore no changes were made to the draft policy, although minor editing changes were made to the supporting text.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Theoretically, Policy H9 (Vacant Building Credit) could indirectly lead to adverse effects on SACs/SPAs/Ramsar sites in conjunction with those policies setting the housing targets for each borough, as the policy advocates a mechanism to facilitate the potential for re-development on vacant brownfield sites that would not otherwise come forward for development. However, the policy makes clear that in London, this kind of development opportunity is highly unlikely to come forward, and it is also clear that the scale of development would be likely to be extremely limited.

Therefore, it is possible to conclude no likely significant effects of policy H9 on European protected wildlife sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. Additional wording has been added to part C of the policy, specifying that these requirements for vacant buildings should not apply to heritage buildings on the At Risk register where prolonged vacancy may damage the building. This amendment allows for greater flexibility to prevent further damage to vacant buildings, and strengthens the policy narrative surrounding conserving and enhancing the historic environment.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 20: H9 Vacant building credit

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a
Medium Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a
Long Term						+/	n/a		n/a	?	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a
Direct / Indirect						D	n/a		n/a	D	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a
Temporary / Permanent						T/P	n/a		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a
EQIA																								
Short Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	+	+	n/a	+	-	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	n/a	I	I	D	n/a	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a		I				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
CSIA																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.20 H10 Redeveloping existing housing and estate regeneration

Policy description

This policy supports the redevelopment of existing housing to achieve higher densities where possible. There is a strong emphasis on the contribution that regeneration and intensification of existing housing uses can make in meeting long term housing needs. Loss of existing housing will only be considered acceptable in instances where it is replaced at existing or higher densities. Any loss of affordable housing should be replaced with equivalent or better quality accommodation, and should generally seek an uplift in overall provision.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would support the intensification of London's existing housing stock, and contribute towards meeting London's long term housing needs. The policy supports an uplift in overall affordable housing provision, and an improvement in quality where possible. This is likely to encourage greater equality within the housing market, and promote mixed-use and diverse communities.

An increase in affordable housing stock could help to improve access to housing for lower income communities, and make more efficient use of existing land resources. The policy emphasises the importance of resident consultation when undertaking redevelopment and regeneration schemes, providing opportunities for communities to actively engage and participate in the process. Estate regeneration does however have the potential to fragment community networks, particularly if temporary or permanent displacement occurs. This could reduce the security of residents, and create some uncertainties surrounding maintaining strong and inclusive communities.

The delivery of high quality, high density units could have a number of economic benefits for London as whole. Such schemes could help to overcome barriers to employment, particularly for lower income communities, and maintain the city's attractiveness as a place to live and work. This could help to retain labour within the capital, and contribute to London's overall economic competitiveness.

The policy strongly supports the sustainable use of land, helping to unlock sites to maximise development capacity. Estate regeneration is promoted as an opportunity to improve the social, economic and physical environment in which homes are located. Depending on the nature of these improvements, they could improve access to infrastructure and services, and contribute to wider placemaking objectives. These wider regenerative considerations will help to mitigate potentially adverse impacts associated with high density development, and could specifically support the needs of lower-income communities.

Cumulative

This policy complements policies G4 Local green and open spaces, SI1 Improving air quality and SD10 Strategic and local regeneration which support the re-use of buildings and protection to the environment, through green space provision and conservation of the green belt. This policy conflicts with policies H17 Purpose built student accommodation, H18 Large scale purpose built shared living and SD3 Growth Areas in Wider South East and Beyond, which support the delivery of new developments.

Recommendations

It was recommended that further detail could be provided on the range of housing types, such as accessible and adaptable provision, to ensure that the needs of lesser mobile communities, and those with

'invisible' disabilities, are met. It was also recommended that further detail was provided on the types of social, economic and environmental improvements that could be expected to support higher density development. This included further reference to the role of design in the redevelopment process, and any wider impacts on the townscape.

GLA response

The GLA clarified that further detail surrounding supporting infrastructure, design and inclusive access were provided in other sections of the Plan. The policy was however amended to reference the quality of housing. Minor amendments and clarifications were added to the supporting text.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

The consultation responses raised a number of issues surrounding the potential for estate regeneration to result in the displacement and fragmentation of communities, and that these potentially adverse effects were not sufficiently represented in the IIA.

Paragraph 4.10.3 of the supporting policy text sets out that the proposals for estate regeneration schemes should take account of the requirements of the Mayor's Good Practice Guide. The guide supports a fair deal for tenants and leaseholders, including that disruption should be kept to a minimum, and that landlords should support the right to return for residents.

It is however acknowledged that estate regeneration can cause disruption to families, local communities and in some instances the continuity of education for children. As a result, additional wording has been added to the initial policy appraisal above to clarify these potential impacts.

This amendment to the assessment has resulted in revisions to the scoring matrix below.

Table 21: H10 Redeveloping existing housing and estate regeneration

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						+	+		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						+	+		n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						I	I/D		n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	D	n/a	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	+	?	+	O/-	+	?	?	+	n/a	n/a	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Medium Term	+	+/?	+	+/?	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Long Term	+	+/?	+	+	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Direct / Indirect	D	D	I	I	D	I/D	I/D	I/D	n/a	n/a	I/D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	P	P	P	T/P	n/a	n/a	P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA																								
Short Term	n/a	n/a	+/?		+				n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	+/?
Medium Term	n/a	n/a	+		+				n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	+/?
Long Term	n/a	n/a	+		++				n/a	n/a							+	n/a		n/a	n/a	n/a	n/a	+/?
Direct / Indirect	n/a	n/a	I		D				n/a	n/a							I	n/a		n/a	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	T/P		P				n/a	n/a							T/P	n/a		n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L		L/ GL				n/a	n/a							L	n/a		n/a	n/a	n/a	n/a	L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.21 H11 Ensuring the best use of stock

Policy description

This policy supports the efficient use of land and seeks to maximise the existing housing stock in London through the re-use of vacant or unfit buildings. It acknowledges the high level of competition on land resources in London to support a variety of uses, and therefore supports opportunities to bring vacant stock back into use. This includes boroughs making appropriate use of Empty Dwelling Management Orders to bring forward vacant stock as affordable housing, and monitoring the use of dwellings as holiday rentals.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would support the maximisation of London's housing stock, and help to meet a range of long term housing needs. Although vacant stock accounts for less than one percent of London's total housing stock, measures to proactively bring vacant units back into use could optimise available capacity.

The use of Empty Dwelling Management Orders to transform vacant stock into affordable housing could help deliver much needed affordable accommodation, and would support diverse and inclusive communities. Bringing vacant units back into use can also have a range of regenerative benefits, such as an improved perception of an area, reduced levels of crime, and helping to address wider challenges surrounding overcrowding.

Cumulative

This policy supports policies HC1 Heritage conservation and growth, G7 Trees and woodlands, SI7 Reducing waste and supporting the circular economy and D6 Optimising housing density which support the protection of land and effective development.

Recommendations

It was recommended that the policy could make further reference to inclusive, accessible and adaptable housing, to ensure the needs of lesser mobile communities, and those with 'invisible' disabilities, are met. It was also recommended that more details could be provided on the 'tools available' suggested to reduce the number of unfit and/or vacant homes. The role of affordable housing delivery and brownfield development in contributing to regeneration, and details of supporting infrastructure required, could also be drawn upon further.

GLA response

The GLA clarified that further detail surrounding supporting infrastructure, inclusive access, brownfield development and regeneration benefits were provided in other sections of the Plan.

The policy was however amended to reference the quality of housing and a reference to Empty Dwelling Management Orders to bring long-term vacant stock back into use as affordable housing was added. Minor amendments and clarifications were added to the supporting text.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. An additional clause (part CA) has been added to the policy, setting out that to ensure the best use of stock, boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic needs. Where they are of a reasonable standard, they should be generally protected. This amendment elevates text that was previously in the supporting text, to the policy itself.

Additional text was also added to Paragraph 4.11.1 of the supporting text, setting out that boroughs should levy the council tax empty homes premium to incentivise occupation of vacant properties. Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and tenants in affordable homes are supported to downsize where they wish to do so. These amendments strengthen the policy narrative surrounding making the most efficient use of land and existing housing stock, and is likely to encourage an increased housing supply to meet the diverse needs of London's population.

Additional wording has also been added after Paragraph 4.11.1 of the supporting text. This outlines the recent phenomenon of 'buy to leave' whereby new homes are purchased by investors who rely solely on capital appreciation for their returns. This practice reduces the amount of new housing stock being occupied by households in need, and can also negatively affect the provision of services to the community. Wording amendments have also been made to Paragraph 4.11.2, setting out that the use of dwellings as short-terms holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area. It also reduces the supply of homes available for people to live in.

These amendments to the supporting text strengthen the narrative surrounding increasing the housing stock for residents in need, and supports inclusive and strong communities across London. This is likely to have a range of beneficial outcomes for health, wellbeing, social inclusion and security for communities across the city.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 22: H11 Ensuring the best use of stock

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Medium Term						+	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Long Term						++	+		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a
Direct / Indirect						D	D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	D	n/a
Temporary / Permanent						T/P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	T/P	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	L/GL	n/a
EQIA																								
Short Term	+	+	+	+	+	+	?/+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	+	+	?/+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	+	+	++	++	?/+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I	I	D	D	I/D	D	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		T/P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				+					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

Objectives

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- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
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- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
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- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.22 H14 Supported and specialised accommodation

Policy description

This policy supports the delivery, retention and refurbishment of supported and specialised housing. The design should satisfy the requirements of the specific use or group it is intended for, and should respond to an identified need. The policy includes accommodation provision for many members of society, including young people, disabled people, rough sleepers, victims of domestic abuse and other forms of violence, and people with mental health issues. This also extends to ‘move on’ and ‘re-ablement’ facilities, for communities with specific accommodation requirements.

The policy supports local authorities in undertaking assessments of both short term and long term accommodation needs within their borough. Existing facilities should similarly be audited to identify any capacity surplus or deficits that could inform future accommodation provision or adaptation.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would result in a number of positive outcomes for communities whose needs extend beyond the conventional housing market. The targeted provision of specialist accommodation will enable residents to lead independent and dignified lives, and will encourage inclusive, mixed communities across London.

For people experiencing violence, homelessness and other challenging circumstances, specialist accommodation could improve overall health and wellbeing, by providing a safe and secure community setting. This is particularly important in supporting the needs of women, young people, and residents with a disability or existing health condition, and could help overcome discrimination and marginalisation. Targeted and appropriate housing could improve overall life chances for many vulnerable communities, improving access to key services and economic opportunities.

Cumulative

This policy complements policies S1 Developing London’s social infrastructure and D6 Optimising housing density which support the provision of housing and social infrastructure to vulnerable groups and aim to reduce homelessness.

Recommendations

It was recommended that further reference could be made to accommodate the needs of ‘invisible’ disabilities, including options to support residents with cognitive and sensory impairments. The policy could also reference the quality and design of accommodation. This could include identifying supporting infrastructure to help connect new residential developments to key local services, such as open space, public transport and local amenities. It was also recommended further reference be provided on the affordability of specialist accommodation, particularly as many tenants may require affordable options. This would help cater to the needs of lower-income communities, and those in particularly vulnerable and complex situations.

GLA response

The GLA amended the policy to include a reference to other ‘invisible’ disabilities. The GLA advised that other policies within the Plan addressed the other recommendations. Other minor wording amendments were made to the definitions and terminology used.

Appraisal of finalised policy

No further appraisal required as no significant changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been added to part A1 of the policy, setting out that supported and specialised accommodation could include accommodation for care leavers and people leaving prison to enable them to live independently. This wording amendment was made to provide more detail on what ‘move on’ accommodation could include. The additional text is likely to support positive outcomes for higher risk communities, and ensure accommodation meets the diverse needs of London. This could facilitate greater social inclusion, and maximise life chances for all residents.

Additional wording was also provided to part A2 of the policy, clarifying that supported and specialised accommodation could include accommodation for young people with support needs. This strengthens the policy narrative surrounding inclusivity, supporting the accommodation needs of all communities. The amendment is likely to have positive outcomes for health and wellbeing, and maximising life chances and opportunities for all communities in London.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 23: H14 Supported and specialised accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Medium Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Long Term						?	+		n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	n/a
Temporary / Permanent						I	I		n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a
Direct / Indirect						T/P	T/P		n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	?	?	+	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	+	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	+	?	++	?	?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	D	I	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	P	T/P	T/P	T	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	+	+	?		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+/?		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	+	+	+/?		++				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	I	I	I		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		L/GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.23 H16 Gypsy and Traveller accommodation

Policy description

This policy supports boroughs in identifying permanent Gypsy and Traveller pitches, and putting measures in place to assess future needs. This includes both safeguarding current pitches and supporting the additional provision of secure sites. Gypsy and Traveller accommodation capacity should be protected by the boroughs in line with the requirements of the Equality Act 2010, and actively considered when reviewing new residential development proposals.

The policy also supports boroughs in preparing a needs assessment and encourages an audit to be undertaken of existing pitches and sites. There is a strong emphasis on monitoring and reviewing identified needs, to ensure balanced communities are effectively planned for throughout the Plan period.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would help to overcome barriers faced by Gypsy and Traveller communities in maintaining their values and traditional lifestyles. This will support a range of cultural needs by ensuring access to secure accommodation, underpinned by appropriate supporting infrastructure. Appropriately planning for Gypsy and Traveller communities can help to improve access to educational opportunities, employment and health services for these communities. The policy acknowledges the adverse physical and mental health impacts that can arise from unsuitable and low quality living environments. By seeking to improve the living conditions of Gypsy and Traveller communities, this policy is likely to help improve overall health and wellbeing. This in turn will encourage inclusive, balanced and cohesive communities across London, and help to overcome discrimination and marginalisation.

The policy also facilitates the refurbishment of existing pitches that are no longer 'fit for purpose'. This includes ensuring the provision of accessible and adaptable service blocks, which will improve the quality of accommodation, and overall wellbeing, of existing communities across London.

Cumulative

This policy would align with other policies promoting accessible housing for various groups within society. It would also help promote policies G4 Local green and open space by allowing Gypsies and Travellers designated pitches that would result in reduced use of green and open land.

Recommendations

It was recommended that further information could be provided on the linkages between new pitches and key service and employment opportunities. For example, it could include reference to affordable active travel networks or accessible public transport routes, particularly as appropriate transport connections can play a key role in overcoming severance and associated barriers to employment.

The policy could also reference supporting infrastructure needed to ensure safe access for Gypsy and Traveller communities. This could include sufficient lighting, transport interchange options throughout the day and night, and CCTV where appropriate.

GLA response

No changes were proposed to be made to the draft policy, although minor amendments were made to the policy and supporting text to highlight the link between ensuring that new sites are well-connected to social infrastructure, health care, education and public transport facilities,

The GLA also advised that further detail on social infrastructure, inclusive design are covered in other parts of the Plan. It was similarly noted that detailed pitch and site layout requirements are too detailed for a strategic plan.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed potential likely significant effects to designated sites. Potential linking impact pathways present include: Recreational pressure, Atmospheric pollution and Hydrological changes.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been added as Paragraph 4.16.8A setting out that in instances where new Gypsy and Traveller pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.

This strengthens the policy narrative surrounding inclusive access, and ensures that Gypsy and Traveller accommodation meets the diverse needs of communities. The amendment is likely to promote positive outcomes for health and wellbeing, encourage diverse communities and maximise opportunities for less mobile residents.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 24: H16 Gypsy and Traveller accommodation

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						?	+			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Medium Term						?	+			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Long Term						?	+			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O/?	n/a	O	n/a	n/a
Direct / Indirect						I	I/D			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a	n/a
Temporary / Permanent						T/P	T/P			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global						L	L/GL			n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L	n/a	n/a
EQIA																									
Short Term	+	+	+	?	+	?	+/?	+		n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	+	?	+/?	+		n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	+	?	+	?	+/?	++		n/a	?	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	I/D	I/D	D	I	I	I/D		n/a	I/D	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	P	T/P	T/P	T/P		n/a	T/P	P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L	L	L	L	L		n/a	L	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																									
Short Term	+	+	+		+					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		+					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		+					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	D	D	D		D					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P	P	P		P					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		L					n/a	n/a							n/a	n/a		n/a	n/a	n/a		n/a
CSIA																									
Short Term					-					n/a															
Medium Term					O					n/a															
Long Term					+					n/a															
Direct / Indirect					I/D					n/a															
Temporary / Permanent					T/P					n/a															
Local / Greater London / Wider Region / Global					L					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.24 S1 Developing London's social infrastructure

Policy description

The policy supports boroughs to produce development plans that provide high quality, inclusive social infrastructure, seeking to make best use of available land where there is local and strategic need. This should ensure new facilities are accessible by public transport, and provision is made for cycling and walking. It also supports the repurposing of redundant social infrastructure.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would ensure high density developments have a positive impact for residents by supporting the needs of the local community and delivering regenerative change. The policy supports redundant facilities being repurposed for voluntary and community groups who otherwise find it difficult to find suitable premises. This can improve access to community events which would increase community cohesion, reduce isolation and offer support, all of which can improve health and wellbeing. The use of redundant facilities would also contribute to reducing local crime by ensuring buildings are not left vacant and also provide community activities offering education and support.

The sharing of community facilities would ensure local groups, who often have small budgets, have affordable and appropriate space for their needs. The provision of educational facilities would ensure sufficient school places are provided for local children. This would reduce the need for young people to travel long distances to school, which can be a stressful and expensive experience. It would equally contribute to wider air quality improvements by reducing vehicle use.

The integration of public transport, cycling and walking infrastructure would ensure London's social infrastructure remains accessible, and improves wider connectivity across the capital. The use of redundant social infrastructure and integration of high density developments with transport ensures that available land is used appropriately and sustainably to maximise growth. This would facilitate further economic and employment growth across the city, which would have a profound impact on areas of **deprivation**, directly improving living standards and quality of living.

Cumulative

This policy complements policies G4 Local green and open space and T3 Transport capacity, connectivity and safeguarding which support the provision of public and active transport as well as green spaces to promote active lifestyles. The combination of policies could positively encourage social inclusion, and support a range of favourable health and wellbeing outcomes.

Recommendations

It was recommended that further information be provided about the management practises and inclusive design and access. This could include reference to affordable options, measures to accommodate the needs of religious and ethnic groups, and ensuring inclusive access for lesser mobile communities, and buggy users. It was suggested these measures were considered for both new infrastructure and the development of redundant infrastructure.

GLA response

Additional references to faith groups were made in the supporting text. A reference to alternative uses meeting the needs of the community was also included. The GLA advised that other policies in the Plan addressed issues such as inclusive communities, and inclusive design, Healthy Streets, and green infrastructure.

Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied. The overall effects of implementation of the policy would remain as identified in the initial assessment.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy promotes walking and cycling, which can potentially lead to air quality improvements through reduced reliance on motor vehicles.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. This includes additional wording added to Paragraph 5.1.1, which clarifies that the definition of social infrastructure to include early years and criminal justice facilities. The appropriate availability of childcare facilities can support individual livelihoods, and the overall economic activity within London, by providing parents and carers with the opportunity to work. The provision of appropriate criminal justice facilities can help to contribute to safety and security, as well as the perceptions of safety within a community.

The amendment acknowledges the diversity of infrastructure requirements to meet the needs of communities in London, and strengthens the policy narrative surrounding inclusivity. This policy amendment has resulted in revisions to the scoring matrix below.

Table 25: S1 Developing London’s social infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		+	n/a	+	O	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term						n/a	n/a		+	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term						n/a	n/a		+	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Direct / Indirect						n/a	n/a		I/D	n/a	I/D	D	D	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a
Temporary / Permanent						n/a	n/a		T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	P	n/a	T	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		L/GL	n/a	L	L/GL/W	L	L	n/a	L	n/a	n/a	n/a	L/GL/W	n/a	L	n/a	n/a
EQIA																								
Short Term	+	+	O	?	n/a	+	+	+/?	+	?	+	+	+	n/a	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?
Medium Term	+	+	+/?	?	n/a	+	+	+/?	+	+/?	+	+	+	n/a	n/a		n/a	n/a	n/a	O	n/a	n/a	n/a	?
Long Term	+	+	+	?	n/a	+	+	+/?	+	+/?	+	+	+	n/a	n/a		n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect	D	D	I	I	n/a	D	I	I/D	I/D	I	D	D	D	n/a	n/a		n/a	n/a	n/a	I/D	n/a	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a		n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	L	L	L	L	L	L	L	L	n/a	n/a		n/a	n/a	n/a	L	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		O
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		O	n/a	n/a		O
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				n/a	n/a				n/a	n/a		n/a	n/a		I/D	n/a	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		T/P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		L	n/a	n/a		L
CSIA																								
Short Term				O					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London’s geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.25 S6 Public toilets

Policy description

This policy supports the provision of free public toilets that are accessible and appropriate for disabled persons and families with young children in retail outlets, leisure facilities and other large public spaces across London.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would promote equality and acceptance as it ensures toilets will have inclusive access and be of a design which caters for range of needs. This is particularly important for lesser mobile communities, older residents, those with specific gender and cultural needs, pregnant women and families with babies and young children. Moreover, the provision of free facilities will improve access and availability for low-income residents. A range of toilets will be constructed including unisex disabled persons toilets, Changing Places toilets that requires a carer, separate baby changing facilities and expanded cubicles for the elderly and those with limited mobility and may require additional space. Furthermore, in an effort to ensure greater social inclusive and foster a greater sense of tolerance, gender neutral toilets will be considered. This could play an important role in overcoming discrimination, and accommodating the needs of all residents and visitors.

While the creation of 24 hour toilet services contributes to the supporting infrastructure of London night-time economy there is a risk of crime and anti-social behaviours occurring as toilets are often associated with surveillance and security management. Facilities will remain open on open public spaces 'during opening hours', if open hours are after dark toilets may indirectly facilitate crime and anti-social behaviour if the proper measures are not considered as is in case of the draft policy.

Public toilets built in recreation spaces and other open public spaces will allow residents and visitors to move around London confidently. This will indirectly encourage longer stays in these spaces, thereby increasing the time people might confidently carry out exercise and physical activities.

Cumulative

This policy aligns with policy G4 Local green and open space as both policies support local amenities which could improve local health and wellbeing.

Recommendations

It was recommended that further information be provided in relation to the '10 minute walking' distance to the nearest toilet facilities as this may not be considered accessible for people with disabilities and mobility issues, and therefore may take longer to reach facilities.

It was recommended that consideration be given to the positioning of toilets in sports grounds/open spaces and what form the necessary surveillance and maintenance measures would take.

GLA response

Amendments were made to the policy including additional text covering issues of ongoing maintenance and surveillance and the removal of the '10 minute walking' distance measure. Other editorial changes were made to improve clarity and readability.

Appraisal of finalised policy

Amendments made to the policy provide clarity on application of the policy however, the overall effects of implementation will remain the same as noted in the initial appraisal with the exception of surveillance issues. The supporting text now clarifies the importance of improved security and safety measures. The result is a neutral to positive effect as the details of security measures are to be discerned later in the planning stage. Furthermore, security measures are only considered at the entrance therefore criminal activity could still take place inside toilet facilities, likely after dark.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. Additional wording has been added to part A of the policy, to expand the type of development proposals that are required provide and secure the future management of free publicly-accessible toilets. The policy has been expanded to ensure that development proposals that include large-scale developments, such as sport, health care facilities, transport hubs, cultural and civic buildings are required to provide public toilets. Further wording has also been added to ensure toilet facilities are suitable for a range of users, including people of all gender identities.

Further amendments were also made to Paragraph 5.6.3 of the supporting text, specifying that a suitable level of choice should be provided to take into account the needs of all Londoners. Additional text has also been provided to support that where gender-specific toilets are provided, a gender-neutral options should also be provided wherever possible, in addition to unisex disabled persons toilets. Paragraph 5.6.3 also makes reference British Standard Code of Practice for the design of an accessible and inclusive built environment.

These amendments ensure that all appropriate forms of development are included within the policy requirement for toilet provision, and strengthens the narrative surrounding inclusive and publicly available access to key facilities. This includes accommodating the needs of a range of users, and reflecting London's diversity in the provision of infrastructure. These additions to the policy will further support inclusive access, connectivity and improved perceptions of safety and comfort. These policy amendments has resulted in revisions to the scoring matrix below.

Table 26: S6 Public toilets

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EQIA																								
Short Term	+	+	+	+/?	n/a	n/a	+/?	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	++	++	+	+/?	n/a	n/a	+/?	++	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	++	+	+/?	n/a	n/a	+/?	++	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D	D	D	I	n/a	n/a	I	D	n/a	n/a	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	L	n/a	n/a	L	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Medium Term	++	++	+		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Long Term	++	++	+		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a					n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a
CSIA																								
Short Term				O/+					n/a															
Medium Term				O/+					n/a															
Long Term				O/+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.26 S7 Burial space

Policy description

The policy supports the re-use of burial space and the protection of cemeteries. It encourages boroughs to ensure the different burial provisions and needs of all communities in London are recognised when preparing Development Plans for new cemeteries. Moreover the policy aims to foster cross-borough relationships to develop cemeteries for local communities where space is a premium in an effort to curb burials in outer London and beyond that would otherwise result in access and cost issues for families, which has a disproportionate effect on London's poorest.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy help to support social equality among Londoners as it acknowledges the different burial needs of faith-based communities. Moreover, promotion of cemeteries can have a positive effect on mental well-being as burial grounds offer quiet areas for contemplation. In order to facilitate equality the policy must strongly adhere to total parity in understanding of faith/religious requirements, any imbalance and/or preference given to certain to religious groups would result in potential animosity. Moreover, fostering cross-borough cooperation would increase the availability of burial space within local and surrounding areas. This would help to improve accessibility for those with limited mobility or poor access to public transport.

This policy would support London's wider natural capital as burial grounds provide relatively undisturbed areas where particular fauna and flora can flourish, although the re-use of burial grounds could cause disturbances to existing biodiversity. Protection of existing cemeteries has a positive effect on the conservation of London's historic environment, however this is conflicted by the policy's other aspect, the re-use of burial space. Historic cemeteries may form part of registered parks and gardens and contain listed monuments.

Cumulative

This policy complements policies S1 Developing London's social infrastructure and H1 Increasing housing supply which support the provision of infrastructure as available infrastructure capacity, particularly housing development, should only be considered confidently following assessment of current burial deficits and projecting future needs.

Recommendations

Potential amendments to the policy were advised with respect to whether there were instances that burial sites were acceptable forms of development in London's Green Belt and MOL. It was also recommended that clarification was provided on the criteria/ restrictions for the re-use of burial grounds and creation of new cemeteries. It was also suggested that further information on inclusive access was provided, both in terms of travel to the burial ground, and accommodating the movement of buggies and wheelchairs within.

GLA response

The GLA advised that use of green belt and MOL land as a cemetery is inappropriate under the NPPG.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because no locations are identified and there are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added to Paragraph 5.7.2, setting out that the unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries. This clarifies that issues relating to the historic environment needs to be considered, and strengthens the policy narrative surrounding protecting and enhancing the historic environment.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 27: S7 Burial Space

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	?	?/+	n/a	n/a	n/a
Medium Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	+	?/+	n/a	n/a	n/a
Long Term						O	O		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O	n/a	+	+	?/+	n/a	n/a	n/a
Direct / Indirect						D	D		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I/D	D	D	n/a	n/a	n/a
Temporary / Permanent						P	T/P		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T	n/a	T/P	P	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL	L/GL	L ^{GL} / _W	n/a	n/a	n/a
EQIA																								
Short Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Medium Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Long Term	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	n/a
Direct / Indirect	I/D	D	n/a	n/a	n/a	n/a	n/a	D	n/a	n/a	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	D	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L ^{GL} / _W	L	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	L ^{GL} / _W	n/a	n/a	n/a
HIA																								
Short Term	+	+	n/a		n/a				n/a	n/a				n/a	+		+	n/a		n/a	n/a	n/a		+
Medium Term	+	+	n/a		n/a				n/a	n/a				n/a	+		+	n/a		n/a	n/a	n/a		+
Long Term	+	+	n/a		n/a				n/a	n/a				n/a	+		O	n/a		n/a	n/a	n/a		+
Direct / Indirect	I/D	I/D	n/a		n/a				n/a	n/a				n/a	I		I	n/a		n/a	n/a	n/a		I
Temporary / Permanent	T/P	T/P	n/a		n/a				n/a	n/a				n/a	T/P		T	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L ^{GL} / _W	L ^{GL} / _W	n/a		n/a				n/a	n/a				n/a	L/GL		L/GL	n/a		n/a	n/a	n/a		L/GL
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
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- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.27 E5 Strategic Industrial Locations (SIL)

Policy description

The policy supports the proactive management of SILs through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the function of London's economy.

The policy supports development proposals in SILs for uses such as general industry, storage and distribution, light industrial and flexible uses. The policy states that proposals for other uses should be refused unless there has been a strategically co-ordinated process of SIL consolidation through a Development Plan.

The policy aims to ensure that development proposals within or adjacent to SILs do not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24 hour basis. Residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, soundproofing and other design mitigation in the residential development.

Initial appraisal and recommendations

Social, economic and environmental effects

The policy would have positive effects on London's economic competitiveness and employment as it contributes to the protection of strategic industrial locations, which are significant contributors to London's employment and economic offer.

The policy would have positive effects on social integration objectives as it supports high quality and fit for purpose housing within proximity to functioning SILs, including a need for particular attention to the layout, access and public realm associated with development. This can help mitigate adverse impacts of severance and exclusion for residents living locally to designated SIL, such that SIL areas, far from acting as barriers, are better integrated within their wider spatial contexts. However, the policy is likely to conflict with objectives supporting residential growth to meet housing needs, due to conflicts over constrained land supply.

Cumulative

This policy could conflict with policies G6 Biodiversity and access to nature and SI1 Improving air quality which seek to reduce airborne pollutants and mitigate against climate change for the benefit of the environment. It supports policies SD1 Opportunity Areas, SD2 Collaboration in the Wider South East, SD3 Growth areas in the Wider South East and beyond and SD4 The Central Activities Zone (CAZ) which support delivering wider economic growth across London.

Recommendations

The policy does not reference the role that SILs can play in skills, training and links with educational institutions. It is recommended that 'bridging' services to support young people from school, apprenticeships and training are particularly important, especially to those from low-income households.

GLA response

This policy was previously part of Policy 'Land for industry, logistics and services to support London's economic function' but no changes are proposed to be made to the text of the draft policy. The GLA advised that skills, training and apprenticeships are covered in E11 and the Mayor's Economic Strategy provides further details on these issues.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy supports proactive management of SILs.

Post-consultation amendments

The consultation responses raised concerns that the policy supports the refusal of development proposals for retail, places of worship, leisure and assembly uses within the SIL. This could limit the provision of supporting social infrastructure for communities, particularly religious and ethnic groups, however sufficient provision should be identified through borough social infrastructure assessments, as required by Policy S1.

This consultation response has resulted in revisions to the scoring matrix below.

Table 28: E5 Strategic industrial locations (SIL)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	n/a		n/a	+	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Medium Term						+	n/a		n/a	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Long Term						+	n/a		n/a	++	+	n/a	n/a	-	n/a	-	n/a	n/a	n/a	n/a	n/a	?	?	O
Temporary / Permanent						I	n/a		n/a	D	D	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	I	I/D
Direct / Indirect						T/P	n/a		n/a	P	P	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P
Local / Greater London / Wider Region / Global						L/GL	n/a		n/a	L/GL	L/GL	n/a	n/a	L	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL	L/GL
EQIA																								
Short Term	?	?	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	?	?	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	-	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	?/-	+	n/a	n/a	?	n/a	n/a	n/a	n/a	++	n/a	+	n/a	-	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Temporary / Permanent	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	D	n/a	I/D	n/a	I/D	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Direct / Indirect	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	T/P	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL	n/a	L/GL	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
HIA																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				-	n/a		n/a	n/a		n/a	n/a	n/a		O
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				I/D	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L/GL	n/a		n/a	n/a		n/a	n/a	n/a		L/GL
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To contribute to safety and security and the perceptions of safety
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- To conserve London's geodiversity and protect soils from development and over intensive use.
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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.28 E10 Visitor infrastructure

Policy description

This policy aims to strengthen London's visitor economy and associated employment by enhancing and extending its attractions, legibility, and overall visitor experience. There is a strong emphasis on protecting, enhancing and promoting key visitor attractions and supporting cultural infrastructure.

The policy encourages a balanced tourist economy, and supports the sufficient supply of quality and accessible visitor accommodation, including hotels and serviced accommodation in the CAZ, but also in other parts of inner London and in outer London. The role of apart-hotel and short-term lettings are supported while ensuring they do not compromise housing provision.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would result in a number of positive effects through the strengthening of London's visitor economy. The policy supports serviced accommodation in town centres and within Opportunity Areas, where there is good transport access and connections to the centre of London.

The promotion of tourism will support a range of economic benefits, and could stimulate job creation across a number of skills sectors. A strong visitor economy will support businesses and attractions across the city, and could contribute to wider multiplier and regenerative effects. There is particular emphasis on spreading benefits across outer London which could help to encourage job creation outside of the strategic tourist destinations.

The policy would have positive effects on the accessibility and connectivity of visitors, particularly as it supports the positioning of new accommodation close to good public transport links, encouraging the use of more sustainable forms of transport. There is also a strong emphasis on inclusive design and accessibility, which plays a significant role in overcoming severance, particularly for less mobile residents and visitors.

The policy could have adverse impacts on overall housing delivery, as it could potentially restrict housing development in favour of tourist accommodation and supporting infrastructure.

Cumulative

This policy aligns with policies S6 Public toilets, HC2 World heritage sites, G5 Urban greening, SD4 The Central Activities Zone (CAZ) and T2 Healthy streets which support vital infrastructure and the delivery of quality world heritage sites and green spaces to a growing visitor economy.

Recommendations

It was recommended that further details could be provided on how conventional housing would be protected against excessive development of visitor accommodation. It was also recommended that the scope of the policy should be expanded to include the use of brownfield land, the wider regenerative opportunities associated with the tourist industry. Further details on the definition of 'supporting infrastructure', and impacts on existing public transport infrastructure could also be included.

Although the policy references connectivity, it was recommended that greater reference to legibility is made to support visitors in manoeuvring around a potentially unfamiliar built environment.

GLA response

Significant changes were made to accessible hotels policy requirements in Part G with additional option provided.

The GLA also included references to legibility to enhance connectivity and further information / references to supporting infrastructure including public realm, public toilets and measures to promote access by walking, cycling and public transport. However in terms of impacts on the transport network, these would be addressed by policy T4.

References were also added to spreading economic and regeneration benefits by promoting tourism.

The GLA clarified that Part D of the policy, in combination with the housing supply policies would ensure that visitor accommodation would not compromise convention housing.

Appraisal of finalised policy

The implementation of the finalised Policy would not include a reference to secure or safe environment. However, the policy would contribute in protecting and enhancing the historic environment.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The provision of 58,000 new serviced accommodation units could pose threats to European designated sites. However, it is for individual boroughs to determine where new capacity is most suitably located, through their Local Plans and development control process and these processes will include HRA as appropriate. Therefore, growth could be delivered in the majority of London without affecting European sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy and supporting text. Additional wording has been added to part B of the policy, specifying that heritage assets should be conserved, enhanced and promoted. This clarifies that the special characteristics of heritage assets in all parts of London should be conserved, enhanced and promoted, alongside other forms of cultural infrastructure. This has strengthened the overall policy narrative surrounding conserving the historic environments, and recognises its key role within the visitor economy of London. An additional clause (B) was added to Part C of the policy to clarify that a range of visitor accommodation should be maintained, including hostels, bed and breakfast accommodation, youth hostels, camping and caravan sites. This supports an inclusive visitor economy, providing a range of options for lower-income visitors.

Further amendments were also made to Paragraph 6.10.2 of the supporting text. Additional text has been added to consider the needs of business visitors, including the provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose built convention and exhibition centres. This amendment recognises the diverse needs of visitor communities, and is likely to strengthen London's competitiveness as a business destination.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 29: E10 Visitor infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Medium Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Long Term						+	+		O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a	n/a	n/a
Temporary / Permanent						I	I/D		I	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a
Direct / Indirect						T/P	T/P		T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL/W	n/a	L/GL/W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL/W	n/a	n/a	n/a
EQIA																								
Short Term	+	+	n/a	O	n/a	?	O	O	O	O	?	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	n/a	+	n/a	O	O	+	+	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	n/a	+	n/a	+	+	+	+	++	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	n/a	I	n/a	I	I/D	I	I	D	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	n/a	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	L/GL	L/GL/W	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	n/a		O				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		D				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		T				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		L/GL				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				O					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Temporary / Permanent				I					n/a															
Direct / Indirect				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL					n/a															

Objectives

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4.29 E11 Skills and opportunities for all

Policy description

This policy aims to address low pay and to support national, regional and local initiatives promote access to training, skills and employment opportunities for all Londoners.

It also encourages development proposals to encourage employment, skills development, apprenticeships, other education and training opportunities in both the construction and end-use phases, and promotes collaboration between boroughs to open up opportunities for skills and employment.

Initial appraisal and recommendations

Social, economic and environmental effects

In supporting education, improving skills and addressing low pay, the policy would likely contribute to greater levels of equality and social inclusion across London, as it would improve access to employment and promote higher wages. This is likely to benefit young people, those on low incomes, and deprived communities in particular.

By providing opportunities for enhanced skills and training, the policy would have positive effects on London's economic competitiveness and employment, as it would result in an increased pool of skilled labour and could create longer term stability in industries which require specific skills.

In addition, unemployment has been closely linked with poor mental health and low levels of physical activity, therefore, supporting and enhancing employment opportunities would also likely improve the health of residents, again, particularly in low income communities.

In requiring cross borough coordination and collaboration, the benefits of the policy are likely to be both spread across the whole city, while targeted towards the people and the communities which need them the most. This further enhances the likely effectiveness of the policy at realising positive outcomes related to equality, inclusion and social integration. These inclusive opportunities could play a role in overcoming existing barriers, including marginalisation and discrimination.

Cumulative

This policy would complement policies which support the provision of social infrastructure.

Recommendations

It is recommended that the policy could provide further information on how barriers could be removed to opportunities, particular education and employment, for low skill, low income groups and those in deprived communities. Similarly, while the policy highlights a variety of ways to support and enhance skills and opportunities, it is also recommended that further details be provided on the implementation of the suggested initiatives, and how existing barriers such as transport costs and affordable housing can be overcome. Finally, the policy could make more explicit links to wider regeneration opportunities, and associated benefits, as a result of improving education, skills and wages.

GLA response

Significant changes were made to the policy, mostly deletion of the list of initiatives, as these are not areas that are within the remit of the London Plan and are being addressed through the work of the Skills for Londoners taskforce and the Mayor's other initiatives. With the updated policy, the GLA refined the

approach to apprenticeships. The GLA also added in a further reference to the regeneration opportunities this policy helps to enable.

The GLA advised that issues such as transport costs and accessibility, and the availability of affordable housing, are taken forward in other Policies in the Plan and other Mayoral strategies.

Appraisal of finalised policy

No further appraisal required.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. Additional wording has been added to part A of the policy, setting out that the Mayor will work with strategic partners to address gender and ethnicity pay gaps, alongside low pay. This strengthens the policy narrative surrounding inclusivity and equality across communities in London. This amendment is likely to improve opportunities for women and ethnic groups across London, and strengthen economic competitiveness and diversity.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 30: E11 Skills and opportunities for all

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		n/a	O	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	I/D	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/GL	n/a	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EQIA																								
Short Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	?	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	+	+	n/a	n/a	n/a	n/a	n/a	++	n/a	+	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	D	D	I	I	n/a	n/a	n/a	n/a	n/a	I/D	n/a	D	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	L/GL/W	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	I	I	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	P	P	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				O					n/a															
Medium Term				+					n/a															
Long Term				+					n/a															
Temporary / Permanent				I					n/a															
Direct / Indirect				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

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4.30 HC2 World Heritage Sites

Policy description

This policy encourages London Boroughs to actively conserve and protect World Heritage Sites (WHS), ensuring the maintenance of their authenticity and integrity is protected. The management of a WHS is to be implemented by WHS steering groups, comprising of respective and neighbouring boroughs, GLA and Historic England. The policy requires heritage impact assessments to ensure an understanding of potential impacts from proposed development

This policy emphasise the role of development proposals in promoting and enhancing the Outstanding Universal Value (OUV) of a World Heritage Site and its setting. This would be achieved by using WHS Management Plans to inform plan-making and planning applications, ensuring sufficient consideration is given to the protection and/or enhancement of WHS and its setting. This policy also facilitates individual boroughs to protect OUV, WHS and their settings within Local Plans.

Initial appraisal and recommendations

Social, economic and environmental effects

WHS form an integral part of London's townscape and character, attracting visitors from across the globe, contributing significantly to London's economic growth and prosperity. This policy ensures the protection and enhancement of WHS through the implementation of established WHS Site Management Plans, which manage the heritage assets and the wider historic environment. This policy does not prohibit development but seeks to ensure regeneration benefits WHS. Heritage Impact Assessments must form part of Development Proposals to ensure WHS and their settings are not adversely impacted by new development.

The policy supports the use of steering groups and active engagement regarding the management of these sites. This would ensure heritage assets are appropriately protected and managed in WHS, and allow local groups and interested parties to vocalise their ideas about the management and offerings of WHS. These sites can also act as important centres for cultural and community events, facilitating social integration and cultural education. This can help to improve the wider understanding and appreciation of WHS and historical assets across London.

Cumulative

The policy could conflict with the policy H1 Increasing housing supply which supports the development of residential housing. However, the implementation of the policy could complement policies HC1 Heritage conservation and growth and G4 Local green and open space which support the mental health and well-being of residents and visitors through active engagement with heritage and nature.

Recommendations

The policy could provide further clarity regarding the composition and structure of WHS Management Plans and the mechanisms of their implementation. Policy HD4 provided a strong example to follow in the London View Management Frameworks with explanatory supporting text. It was recommended that reference should be made to inclusive design and management to strengthen the cultural aspect of the policy, specifically regarding disabled access, non-English speaking visitor inclusivity and infrastructure, such as safe paths, cycling facilities and vehicle barriers.

GLA response

The policy was amended to clarify further the role of WHS Management Plans in respect of plan making and development proposals. However, the GLA clarified that whilst the GLA was a member of World Heritage Site Steering Groups (who were responsibly for preparing and implementing WHS management plans) they are not the lead of these groups and therefore not able to set policy in relation to the management of World Heritage Sites.

The GLA further advised that other policies in the London Plan addressed issues such as inclusive design.

Appraisal of finalised policy

The amendments made to the policy provide further clarity in relation to how the policy will be applied however the overall effect of implementation will remain the same as noted in the initial appraisal.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional wording has been added to Paragraph 7.2.3, setting out the UK Government's commitment to protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites, and to protecting and conserving their setting. The additional text also states that much of this commitment is discharged by local authorities, including the GLA, through their effective implementation of national, regional and local planning policies for conserving and enhancing the historic environment.

This amendment strengthens the overall policy narrative surrounding conserving and enhancing the historic environment, and the significance of their settings. It also supports appropriate education and information sharing surrounding heritage assets and the role of future generations. This is likely to bring long term benefits for conserving the historic environment, and improving access to these features.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 31: HC2 World Heritage Sites

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		n/a	+	+	+	+	O	n/a	O	n/a	n/a	n/a	O/+	+	n/a	n/a	O
Medium Term						n/a	+		n/a	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	++	n/a	n/a	+
Long Term						n/a	+		n/a	+	+	+	+	+	n/a	+	n/a	n/a	n/a	+	++	n/a	n/a	+
Direct / Indirect						n/a	D		n/a	D	D	I	D	I	n/a	I	n/a	n/a	n/a	I	D	n/a	n/a	I
Temporary / Permanent						n/a	P		n/a	P	P	T/P	P	P	n/a	T/P	n/a	n/a	n/a	P	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/ GL	L/ GL	L/GL /W	L/GL /W	L	n/a	L/ GL	n/a	n/a	n/a	L	L/GL /W	n/a	n/a	L
EQIA																								
Short Term	+	+	O	O	n/a	n/a	O	n/a	n/a	n/a	n/a	+	+	O	n/a		n/a	n/a	O	+	+	n/a	n/a	O
Medium Term	+	+	+	O	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	n/a		n/a	n/a	O	+	+	n/a	n/a	+
Long Term	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	n/a		n/a	n/a	+	+	++	n/a	n/a	+
Direct / Indirect	D	I	I	I	n/a	n/a	I	n/a	n/a	n/a	n/a	I	I/D	I	n/a		n/a	n/a	I	D	D	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	n/a	T/P	T/P	P	n/a		n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L	L	L	n/a	n/a	L	n/a	n/a	n/a	n/a	L	L/ GL	L	n/a		n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	L
HIA																								
Short Term	+	+	n/a		n/a				n/a	n/a				O/+	n/a		n/a	n/a		+	+	n/a		?
Medium Term	+	+	n/a		n/a				n/a	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Long Term	+	+	n/a		n/a				n/a	n/a				+	n/a		n/a	n/a		+	++	n/a		?
Direct / Indirect	I	I	n/a		n/a				n/a	n/a				I	n/a		n/a	n/a		D	D	n/a		I
Temporary / Permanent	T/P	T/P	n/a		n/a				n/a	n/a				P	n/a		n/a	n/a		T/P	P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	n/a		n/a				n/a	n/a				L	n/a		n/a	n/a		L/ GL	L/ GL	n/a		L
CSIA																								
Short Term				O					n/a															
Medium Term				O					n/a															
Long Term				+					n/a															
Direct / Indirect				I					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.31 HC5 Supporting London's creative and cultural industry

Policy description

This policy supports the growth of London's diverse creative industries by encouraging boroughs to provide protection for cultural venues and facilities ensuring they are not lost to new development, where possible. The policy identifies focal points for local regeneration with development plans acting sympathetically to cultural venues, particularly those with heritage value.

The policy encourages London Boroughs to work collaboratively with the Mayor and other relevant stakeholders to outline Creative Enterprise Zones in Local Plans, with a focus on existing or emerging clusters of creative industries. The designation of a Creative Enterprise Zone will enhance the local economy and make appropriate provisions for creative industries.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would ensure the conservation and enhancement of the unique character of London's cultural and heritage assets in an effort to promote creative industries. It protects venues such as museums and galleries, and foster relationships with educational institutions who can utilise these spaces to provide inclusive learning opportunities. Improved and more frequent use can increase the cultural value and social importance these venues will have within local communities. The loss of cultural venues could have adverse effects on a local community and fracture social integration as these places regularly serve as focal point for residents and visitors.

The policy supports important employment opportunities within the creative industries. It seeks to improve the provision of affordable business space, especially by clustering creative businesses. This supports smaller businesses who may be limited by London's expensive rental costs. This would help to diversify London's economy and support growth across different industries. Creative and cultural industries play a significant role in London's tourism, and therefore this policy would help to continue attracting tourists from across the world, contributing significantly to London's economy.

Cumulative

The policy complements policies HC2 World Heritage Sites and E11 Sector growth opportunities and spatial clusters which support the development and growth of heritage and creative industries through conservation and the support of museums and galleries.

Recommendations

This policy could provide more clarity on how different groups are directly or indirectly supported by the policy. The supporting text should explicitly state what type of uses cultural venues can accommodate and what constitutes a 'creative industry'.

It was recommended that reference should be made to the management of inclusivity, specifically in relation to learning opportunities, such as language barriers, sensory impairments and mobility.

GLA response

Substantial changes were made to the policy and supporting text in order to streamline content and improve readability. The GLA advised that the policy did indicate the range of different people that could be supported but that it was boroughs to assess local need for cultural facilities. A definition of creative industries was also included in the glossary.

The GLA advised that it wasn't appropriate for a strategic plan to identify what types of uses should go in a cultural venue as these would depend on local circumstances.

The GLA further advised that other policies in the Plan addressed issues of inclusivity and design.

Appraisal of finalised policy

The amendments made to the policy improve readability and provide further clarity in relation to the application of the policy. The policy would encourage partnership and collaboration between creative industries and educational institutes helping to train young talent, encourage volunteer work associated with cultural opportunities and provide employment opportunities in creative industries. This would positively impact young people ensuring they receive the formal and vocational education required to attain employment in the future.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy provides positive provision for good and integrated public transport which has potential to reduce atmospheric pollution.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional text has been added to Paragraph 7.5.1 of the supporting text, acknowledging that the vibrancy of London's culture is integrally linked to the diverse communities of the city, and grassroots venues and community projects are as important as London's famous cultural institutions in providing opportunities for all Londoners to experience and get involved in culture.

This amendment strengthens the policy narrative surrounding inclusive cultural opportunities, and their contribution to the city's vitality and cultural offer. The addition of grassroots and community venues and projects is particularly important in improving access to cultural opportunities for all communities.

These policy amendments have resulted in revisions to the scoring matrix below.

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		n/a	O	n/a	+	+	O	n/a	O	n/a	n/a	n/a	O	+	n/a	n/a	?
Medium Term						+	+		n/a	+	n/a	+	+	+	n/a	+	n/a	n/a	n/a	+	+	n/a	n/a	?
Long Term						+	+		n/a	+	n/a	+	++	+	n/a	+	n/a	n/a	n/a	+	+	n/a	n/a	?
Direct / Indirect						I	I/D		n/a	I/D	n/a	I	I/D	I	n/a	I	n/a	n/a	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	L/GL	n/a	L/GL	L/GL	L	n/a	L	n/a	n/a	n/a	L/GL	L/GL/W	n/a	n/a	L
EQIA																								
Short Term	+	+	n/a	O	n/a	+	+	n/a	?	O	?	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Medium Term	+	+	n/a	O	n/a	+	+	n/a	?	O	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Long Term	++	++	n/a	O	n/a	+	+	n/a	?	+	+	n/a	++	n/a	n/a		n/a	n/a	n/a	n/a	+	n/a	n/a	n/a
Direct / Indirect	I	I	n/a	I	n/a	I	I/D	n/a	I	I/D	I/D	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	n/a	P	n/a	T/P	T/P	n/a	T	T/P	T/P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	n/a	L	n/a	L/GL	L/GL	n/a	L	L/GL	L/GL	n/a	L/GL	n/a	n/a		n/a	n/a	n/a	n/a	L	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				?	n/a				O	n/a		n/a	n/a		O	+	n/a		?
Medium Term	+	+	+		n/a				?	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Long Term	+	+	+		n/a				?	n/a				+	n/a		n/a	n/a		+	+	n/a		?
Direct / Indirect	I	I	I		n/a				I	n/a				I	n/a		n/a	n/a		I/D	I	n/a		D
Temporary / Permanent	T/P	T/P	T/P		n/a				T	n/a				T/P	n/a		n/a	n/a		T/P	T/P	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L	n/a		n/a	n/a		L/GL	L	n/a		L
CSIA																								
Short Term				+					?															
Medium Term				+					?															
Long Term				O					?															
Direct / Indirect				I					I															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L					L															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
 - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
 - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
 - To contribute to safety and security and the perceptions of safety
 - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
 - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
 - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
 - To maximise accessibility for all in and around London
 - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
 - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
 - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
 - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
 - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
 - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
 - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
 - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
 - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
 - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
 - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
 - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
 - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
 - To conserve London's geodiversity and protect soils from development and over intensive use.
 - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
 - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.32 HC6 Supporting the evening and night-time economy

Policy description

This policy encourages London Boroughs to develop strategies to manage the growth and diversity of night-time activities between the hours of 6pm – 6am, in an effort to promote London functioning as a 24-hour city. The policy supports the expansion of London's night-time economy by encouraging the extension of opening times of existing facilities and making public space and transport infrastructure safe and more accessible. Where possible, expansion should be concentrated in the Central Activities Zone (CAZ), strategic areas of night-time activity and where night-time public transport operates,

This policy advocates an integrated approach to planning, licensing, out-of-hours servicing/deliveries, security and cleansing services. Boroughs should work in conjunction with all relevant local stakeholders.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy supports the protection and enhancement of creative entertainment industries and a diverse range of events and activities in various places and spaces. This range of events and the promotion of a '24 hour city' would support wider economic growth in London, diversifying the economy and attracting visitors from across the globe. This includes the provision of non-alcohol related activities, and those specific to the LGBTQ community, promoting a culture of tolerance and inclusion across the city's evening activities.

The policy is not expected to have a significant effect on CAZs where night-time transport is already implemented. However, the policy stresses the importance of night-time transport to facilitate economic activity outside of CAZs. Night-time activities can result in pedestrian overcrowding on pavements between venues, which may be exacerbated when patrons 'spill out' from venues, particularly pubs and bars. This can have noticeable effect on noise pollution and present health and safety risks when close to roads.

Implementation of this policy could have negative impacts on health and wellbeing as there are often associations with night-time economic activities and unhealthy behaviours, such as excessive alcohol and fast food consumption. The policy does seek to curb noise pollution, but the encouragement of a night-time economy is likely to still result in an increase in local noise, which could disproportionately impact upon older residents, young children and those with a disability or health condition. However, this would be more of an issue outside of the CAZ, in predominantly residential areas and therefore needs appropriate management to mitigate the potential impacts.

The policy also supports the appropriate management of key centres to ensure safe environments. This is promoted through engagement with key stakeholders such as the police and local businesses to improve the safety, legibility and welcoming nature of night time hubs. This extends to safe, 24 hour transport options, improved public realm, and the role of 'passive surveillance'. This is particularly important for higher risk groups, including women, lesser mobile residents, religious and ethnic minority groups and LGBTQ communities.

Cumulative

The policy aligns with policies E11 Sector growth opportunities and spatial clusters, SD1 Opportunity Areas and T9 Funding transport infrastructure through planning as the night-time economy is a potential growth market. Conversely, the policy may be in conflict with policies D13 Noise and T2 Healthy streets promoting a healthier city and reduces noise disturbances.

Recommendations

It was recommended that this policy could provide further information in relation to negative health impacts often associated with the night time economy. Although the policy sought to strike a balance between assuring night-time economic growth and mitigating detrimental health impacts, further detail could be provided on how these could be mitigated or lessened, for example a reduction in fast food outlets and licensing restrictions. It was also suggested that further reference could be made to affordable activities within the night economy, to ensure opportunities are available for lower-income communities.

It was also recommended that information should be provided regarding the management of traffic flow, congested public footpaths, along with the provision of lighting and legibility measures to encourage safe access throughout the night.

GLA response

The policy was amended to further highlight some of the potential negative impacts in relation to the night-economy, however the GLA advised that the policy supports proactive planning such as diversifying the night time offer to ameliorate the agglomeration of uses such as public houses and night clubs. Part C of the policy requires boroughs to take an integrated approach to planning and licensing, safety and security etc. by working closely with stakeholders such as the police. This would help with more indirect impacts such as the management of traffic flow and potentially congested public footpaths.

The GLA further advised that other policies within the Plan dealt with more substantive recommendations such as noise, agent of change, fast food, connectivity and public realm etc., and the affordability of activities was outside the scope of the London Plan.

Appraisal of finalised policy

Amendments to the policy provide further clarification of how the policy should be applied and highlights some of the recommendations, however the overall effects of implementation of the policy would remain as identified in the initial assessment. Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This policy contains positive provision as it promotes the development of the night-time economy in locations where public transport such as the Night Tube and night buses are available, thus reducing atmospheric pollution contributions from private vehicle emissions.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional text has been added to Paragraph 7.6.6 of the supporting text, setting out the role night-time economic activity can play in providing opportunities for social interaction. This strengthens the policy narrative surrounding creating strong, inclusive and resilient communities. Increased social interaction can support a range of positive outcomes for health, safety and participation in social, cultural and educational opportunities across London.

Additional wording has also been added to Paragraph 7.6.10 of the supporting policy text, setting out that impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling. This amendment strengthens the narrative surrounding supporting the protection of natural capital across London, and ensuring that night-time activities are sensitive to surrounding habitats.

Further text has also been added to Paragraph 7.6.11, setting out that borough should work with stakeholders to overcome barriers to accessing the night-time economy. This can include requiring new developments to provide accessible and gender-neutral toilets and supporting venues that serve specific groups, such as LGBT+ venues. This strengthens the policy narrative surrounding inclusive communities, ensuring that all groups can safely access cultural opportunities across London.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 33: HC6 Supporting the evening and night-time economy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	O		+	+	+	n/a	+	O	n/a	O	n/a	n/a	n/a	?	n/a	n/a	n/a	?
Medium Term						n/a	+		+	++	+	n/a	+	+	n/a	+	n/a	n/a	n/a	+/?	n/a	n/a	n/a	?
Long Term						n/a	+		+	++	+	n/a	+	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	?
Direct / Indirect						n/a	I/D		I	D	I	n/a	I/D	I	n/a	I	n/a	n/a	n/a	I	n/a	n/a	n/a	I/D
Temporary / Permanent						n/a	T/P		P	T/P	P	n/a	T/P	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L		L	GL	L	n/a	GL	L	n/a	L	n/a	n/a	n/a	L	n/a	n/a	n/a	L
EqIA																								
Short Term	+	+	n/a	+	n/a	n/a	O	O	O	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	--
Medium Term	+	+	n/a	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	-
Long Term	++	++	n/a	+	n/a	n/a	+	+	+	+	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	-
Direct / Indirect	I	I	n/a	I	n/a	n/a	I/D	I	I	D	I	n/a	I/D	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	D
Temporary / Permanent	P	P	n/a	P	n/a	n/a	T/P	P	P	T/P	P	n/a	T/P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	n/a	L	n/a	n/a	L	L	L	GL	L	n/a	GL	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA																								
Short Term	+	+	-		n/a					-	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	--
Medium Term	+	+	-		n/a					-	n/a				O	n/a		n/a	n/a		n/a	n/a	n/a	-
Long Term	+	+	-/?		n/a					-	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a	-
Direct / Indirect	I	I	I		n/a					D	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		n/a					P	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a					L	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a	L
CSIA																								
Short Term				?																				
Medium Term				?																				
Long Term				+/?																				
Direct / Indirect				I/D							I/D													
Temporary / Permanent				T/P							T/P													
Local / Greater London / Wider Region / Global				L							L													

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
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- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.33 G1 Green Infrastructure

Policy description

The policy facilitates the Mayor's long-term target of making London more than 50% green by 2050 supporting development that increases green infrastructure (for example, street trees and green roofs). The policy requires boroughs to prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, healthy living, sport and recreation. The policy aims to address environmental and social challenges through strategic green infrastructure interventions.

Initial Appraisal and Recommendations

Social, economic and environmental effects

Through the provision of green infrastructure, this policy seeks to improve the liveability of urban environments and increase access to nature. Green infrastructure, such as green walls, and landscaped areas can enhance local areas and improve positive feelings about the area within the local community. Natural elements within urban areas have also been associated with improved mental wellbeing amongst residents. The protection of open spaces also provides areas for physical exercise and social integration.

The use of green infrastructure would help to enhance development and contribute positively to the natural environment through design. Green infrastructure can also drive increased energy efficiency by reducing local temperatures and shading building surfaces, reducing the amount of energy required to cool buildings. Similarly, green facades can absorb sounds, thereby reducing local noise levels.

This policy ensures positive contributions towards environmental protection and enhancement and climate change resilience. It would contribute to reducing the urban heat island effect, as some buildings would be covered, at least partly, by natural elements. Where measures, such as the planting of trees, are possible, flooding in adjacent, populated areas could be reduced due to increased interception of flood waters and improved soil stability. Where green infrastructure measures include harvesting and redirecting storm water, and/or using green roofs, overflow would also be controlled, helping to reduce discharges to surface and ground waters.

Although this policy does not directly refer to cultural activities, the safeguarding of green and open space can fulfil a range of social and cultural needs. This policy encourages the protection and enhancement of green and open spaces which are often important areas for the local community, providing spaces for cultural and community events and facilities. Additionally, heritage assets within these spaces would also benefit from the protection of green and open spaces, which would further enhance the strong relationship between green space and cultural heritage. Biodiversity and heritage conservation can be complimentary and mutually enhancing if managed and designed holistically.

Cumulative

The policy would have positive cumulative impacts as it complements policies G4 Local and open space, G7 Trees and woodland and T2 Healthy streets that support environmental protection and the provision of open space, green networks and community health and wellbeing.

Recommendations

No specific recommendations were identified for this policy.

GLA response

No change to the policy were required.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording and supporting text. Additional wording was added to part B of the policy, to ensure that opportunities for cross-borough collaboration regarding green infrastructure is optimised. This supports a joined-up approach to the planning, protection, design and ongoing management of green infrastructure across London. The specific objectives associated with green infrastructure, such as conservation, flood management, health and wellbeing and sport and recreation have been removed from the policy wording. This clarification was to ensure they are not given greater weight than the objectives set out in Paragraph 8.1.1 of the supporting text.

An additional subsection (CA) has been added to the policy to encourage development proposals to incorporate appropriate elements of green infrastructure into London's network of green and open space. This additional section has strengthened the overall policy in enhancing London's natural capital as part of new development, and encouraging greening where possible. This is likely to increase the overall green cover of London, and support a range of health and recreational objectives.

Within the supporting text, additional wording has been added to include blue spaces within the overall green infrastructure approach. This supports an integrated approach to enhancing London's natural capital, and supports a proactive approach to enhancing London's water bodies. Additional objectives surrounding green infrastructure have also been added to the supporting text, including reference to the urban heat-island effect, landscape and heritage conservation, learning about the environment and supporting food growing. These additions sufficiently demonstrate the wide range of beneficial outcomes associated with enhanced green infrastructure, and can help to achieve a range of desirable policy outcomes. These policy amendments have resulted in revisions to the scoring matrix below.

Table 34: G1 Green Infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		+	n/a	O	n/a	+	O	+	O	O	+	+	+	+	O	n/a	+
Medium Term						+	+		+	n/a	+	n/a	+	+	+	+	+	+	+	++	+	+	n/a	+
Long Term						?	+		?	n/a	+	n/a	+	+	++	+	+	++	+	++	+	+	n/a	+
Direct / Indirect						I	I/D		D	n/a	I/D	n/a	I	I	I/D	I	I	I/D	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						T/P	T/P		P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	T/P	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL/W		L/GL	n/a	L	n/a	L	L	L	L/GL	L/GL	L/GL/W	L	L/GL/W	L/GL/W	L	n/a	L
EQIA																								
Short Term	+	+	+	+	O	+	+	O	n/a	n/a	n/a	n/a	O	+	+		O	O	+	+	+	O	n/a	O
Medium Term	+	+	+	+	+	+	+	+	n/a	n/a	n/a	n/a	+	+	+		O	+	+	+	+	O	n/a	O
Long Term	+	++	++	+	+	+	+	+	n/a	n/a	n/a	n/a	+	+	+		+	+	+	++	+	+	n/a	+
Direct / Indirect	I	I	I/D	I/D	I	D	I	I	n/a	n/a	n/a	n/a	I	D	D		D	I	D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P		T/P	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W	L	L	L/GL	L	L/GL/W	n/a	n/a	n/a	n/a	L	L/GL	L/GL		L/GL	L/GL/W	L/GL	L/GL/W	L/GL/W	L	n/a	L
HIA																								
Short Term	+	+	+		O				O	n/a				O	O		O	O		+	O	O		+
Medium Term	+	+	+		O				O	n/a				+	+		O	+		+	+	O		+
Long Term	+	+	++		+				+	n/a				+	+		O	+		++	+	O		+
Direct / Indirect	I	I/D	I/D		D				D	n/a				I	I		I	I		D	D	I		I
Temporary / Permanent	T/P	T/P	T/P		P				P	n/a				T/P	T/P		T/P	T/P		T/P	T/P	P		T/P
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W		L				L/GL/W	n/a				L/GL	L		L/GL	L/GL/W		L/GL/W	L/GL/W	L		L
CSIA																								
Short Term				+					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL/W					L															

Objectives

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22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.34 G3 Metropolitan open land

Policy description

This policy supports the protection of Metropolitan Open Land (MOL) from inappropriate development by resisting development proposals which would harm it. It also promotes the extension and enhancement of MOL to improve Londoner's quality of life through the provision of space which offers recreational and leisure use, cultural and heritage value, landscape, biodiversity, and green infrastructure. This policy requires that any proposals that alter the boundaries of MOL be undertaken through the Local Plan process, in consultation with the GLA and adjoining boroughs.

Initial appraisal and recommendations

Social, economic and environmental effects

The protection and enhancement of MOL from inappropriate development would offer a number of health and equality benefits. It promotes inclusion through the preservation of key sites of environmental and cultural value. Good quality green space can offer a number of mental and physical health and wellbeing benefits, through the provision of suitable space for activities such as exercise or mindfulness. The protection and improvement of MOL would also help to create better quality open space, which can contribute to more positive feelings about the local environment, increasing its usability and attractiveness.

The retention and enhancement of MOL would support climate change adaptation and mitigation especially where tree planting is encouraged. The planting of trees is linked with a reduction in flood risk, as they intercept precipitation. The maintenance and improvement of MOL would also help mitigate the effects of surface run off and ground water discharge, which can occur from overdevelopment. This would help to create stable environments that act as buffers and can be utilised for recreational purposes as well as benefit nature conservation. Importantly, the biodiversity within these areas would be protected from potentially harmful development and be allowed to flourish, increasing and improving London's wider natural capital offering.

Cultural or historic assets that are located within, or alongside MOL, would benefit from the protection and enhancement of this land, providing they respect the natural habitats within the MOL. By extending or improving the quality of MOL, would also prevent increases to ambient noise conditions and create natural buffers from sound sources to sensitive receptors.

This policy limits the amount of available space for the construction of business or housing stock, but encourages the use of brownfield land, including the Opportunity Areas.

Cumulative

This policy could conflict with policies E11 Sector growth opportunities and spatial clusters, SD4 The Central Activities Zone (CAZ) and H1 Increasing housing supply which encourage construction and development by limiting land availability. The implementation of the policy would however complement policies G1 Green infrastructure, G4 Local green and open land and HC1 Heritage conservation and growth that support environmental protection, open space and promotion of community health and wellbeing through conservation of heritage sites.

Recommendations

It was recommended that further information be provided on uses which would be permitted in MOL, such as multi-functional uses for leisure and recreation and how they could be managed. Details on accessibility, design and ongoing maintenance of MOL should be considered. It was also recommended that a definition of what inappropriate development is and the circumstances surrounding MOL extension, for example whether renewable energy developments be considered appropriate development.

GLA response

The GLA advised that appropriate and inappropriate uses are defined in NPPF Green Belt policy, however the references to examples of improvements to MOL were included including inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present, although increasing the range of uses of MOL would need to be mindful of the sensitivities of some of these areas which overlap with internationally important wildlife sites

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional wording has been provided to what was part C of the policy, to ensure the overall quantum of MOL is not reduced, and that the value of land designated as MOL is improved, in line with the criteria set out within the policy. These wording amendments strengthened the policy narrative in terms of protecting and enhancing natural capital, along with encouraging improvement in the quality of land to support a range of health and recreational objectives.

Within the supporting text, the addition of food growing was added to the opportunities provided by MOL, to recognise the full range of benefits supported by this strategic land within the urban area. These policy amendments have resulted in revisions to the scoring matrix below.

Table 35: G3 Metropolitan Open Land

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	O		?/+	?	?/+	n/a	+	O	O	O	?	+	+	+	+	O	n/a	O
Medium Term						+	O		?/+	?	?/+	n/a	+	+	+	+	?	+	+	+	+	O	n/a	+
Long Term						+	O		?/+	?	?/+	n/a	+	+	+	+	?	+	+	++	+	O	n/a	+
Direct / Indirect						D	D		D	D	I	n/a	I	I	I/D	I	I	I	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						P	T/P		P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	L/GL	L	n/a	L	L/GL	L	L/GL	L/GL	L/GL/W	L	L/GL/W	L/GL	L	n/a	L
EQIA																								
Short Term	+	+	+	+	-/?	?	O	n/a	n/a	n/a	+	n/a	+	O	O		n/a	+	+	+	+	O	n/a	O
Medium Term	+	+	++	+	-/?	?	O	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	+	+	O	n/a	+
Long Term	+	+	++	+	-/?	?	+	n/a	n/a	n/a	+	n/a	+	+	+		n/a	+	+	++	+	+	n/a	+
Direct / Indirect	I/D	I/D	I/D	I	I	I	I	n/a	n/a	n/a	I	n/a	I	I	I		n/a	I	I/D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a	T/P	T/P	T/P		n/a	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W	L	L	L/GL	L	n/a	n/a	n/a	L	n/a	L	L/GL	L		n/a	L	L	L/GL/W	L/GL/W	L	n/a	L
HIA																								
Short Term	+	+	+		-/?				?	?				O	n/a		O	+		+	+	?		O
Medium Term	+	+	++		-/?				?	?				O	n/a		+	+		+	+	?		+
Long Term	+	+	++		-/?				?	?				+	n/a		+	+		++	+	?		+
Direct / Indirect	I/D	I/D	I/D		I				D	D				I	n/a		I	I		D	I/D	D		D
Temporary / Permanent	T/P	T/P	T/P		T/P				P	T/P				T/P	n/a		T	T/P		T/P	P	P		T/P
Local / Greater London / Wider Region / Global	L/GL/W	L/GL/W	L/GL/W		L				L/GL	L/GL				L/GL	n/a		L/GL	L/GL/W		L/GL/W	L	L		L/GL/W
CSIA																								
Short Term				+					O															
Medium Term				+					O															
Long Term				+					O															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L/GL					L															

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15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
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24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.35 G6 Biodiversity and access to nature

Policy description

The policy supports the protection of Sites of Importance for Nature Conservation (SINCs) and green corridors from inappropriate development and aims to improve access to wildlife sites. It also promotes the extension and enhancement of SINCS and green corridors by requiring boroughs to identify areas of deficiency in access to nature and seek opportunities to create habitats of relevance and benefit in the urban context.

The policy sets out a hierarchy of mitigation where harm to a SINCs is unavoidable, the approach is to avoid adverse impacts, or minimise adverse impacts by requiring on-site mitigation and in exceptional cases provide off-site compensation.

Initial appraisal and recommendations

Social, economic and environmental effects

SINCs and green corridors can play an important role in improving the liability of the urban environment. These areas offer wider health and wellbeing benefits, providing areas for physical exercise, such as walking, and for conservation groups. This can increase access to the natural environment within London, and increase environmental and biodiversity education for local residents and groups. Green corridors and attractive green spaces can also facilitate increased active transport when they are well-connected with good walking and cycling infrastructure.

Implementation of this policy would support improvements to the local environment, protecting areas from inappropriate development. These protected sites can provide spaces of tranquillity and reduce ambient noise conditions for local residents. The planting of trees is linked with a reduction in flood risk, due to interception of precipitation, and increased soil stability. The protection of SINCs would therefore help to mitigate the effects of surface run off and ground water discharge, creating more stable environments that can be utilised for recreational purposes as well as benefiting nature conservation.

The protection of strategic environmental sites would also have positive effects on the historic environment. Depending on the nature of the site, this would help to preserve heritage and cultural assets within, which often have important community value and can provide recreational and educational opportunities for communities.

Recommendations

It was recommended that the policy should be expanded to include further detail on the type of development which would be supported in SINCs and how SINCs could be used by local residents for leisure and recreation and any potential transport infrastructure that could be implemented. It was also suggested clarification be provided on the approach to maintenance of the open space and connections between green and open space and creation of green corridors (e.g. tree planting, use of brownfield land). There should also be further detail on the approach to the maintenance of these spaces.

Cumulative

Potential cumulative effects of implementing the policy include conflict with policies E11 Sector growth opportunities and spatial clusters, SD4 The Central Activities Zone (CAZ) and H1 Increasing housing supply which encourage construction and seek to meet residential and economic needs, due to a reduction in the supply of land. Implementation of the policy would however complement policies G7 Trees and woodland, G5 Urban greening and SI1 Improving air quality that support environmental protection, open space and promotion of community health and wellbeing.

GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance on access and maintenance and importance of connections between habitats.

The GLA considered that it is more appropriate for further information and clarification to be provided by boroughs through local plans and not the London Plan. It also considers that some aspects covered in the recommendations are addressed by other policies, such as D11 Noise. The GLA clarified that, in general, apart from supporting infrastructure such as a bird hides or improving access such as level paths, development would not be appropriate in SINCs.

Appraisal of finalised policy

No further appraisal required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy seeks to protect nature conservation sites including European designated sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording and supporting text. Additional wording was provided to part D of the policy, to support development proposals in securing net biodiversity gain. This clarification has been provided to ensure compliance with the NPPF, and strengthens the policy narrative around enhancing natural capital and urban greening across London. It is likely to support beneficial outcomes across biodiversity, health and recreational objectives.

Additional wording has also been provided to part B3 of the policy to support the protection and conservation of priority species and habitats that sit outside of SINC network. The additional wording promotes opportunities for enhancing priority species and habitats through Biodiversity Action Plans. This amendment clarifies that biodiversity promotion is not confined to identified sites, and further strengthens the narrative around protecting and enhancing natural capital across London.

Additional wording has also been provided to part B4 of the policy, supporting opportunities for creating other habitats or features, such as artificial nest sites, that are of particular relevance and benefit in the urban context. This amendment clarifies that opportunities should be explored for non-

priority habitats, and strengthens the policy narrative of enhancing important habitats, species and landscapes.

Within the supporting policy text, additional wording was provided to ensure the level of protection afforded to SINC sites should be commensurate with their status and the contribution they make to the wider ecological network. This amendment clarifies that not all sites have equal merit, and supports an appropriate response to protected sites. Additional clarification text was also provided on European designations and how they are protected beyond the planning system. This included reference to the legal provisions which ensure these sites are not harmed by development, and the duty to consult Natural England on proposals that might affect these sites. This further strengthens the policy narrative surrounding protecting and enhancing natural capital within London, and is likely to support beneficial outcomes across a range of environmental, health and recreational objectives.

As part of the supporting text, there is additional wording provided surrounding how the planning system should provide net gains to biodiversity where possible, including developing corridors to allow species movement. The provision of green corridors is likely to improve connectivity for both species and communities across London, and supports protecting and enhancing the natural environment. These policy amendments have resulted in revisions to the scoring matrix below.

Table 36: G6 Biodiversity and access to nature

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		O	n/a	+	n/a	n/a	O	O	O	n/a	+	O	+	+	O	n/a	+
Medium Term						n/a	+		+	n/a	+	n/a	n/a	+	O	+	n/a	+	+	++	+	+	n/a	+
Long Term						n/a	+		+	n/a	+	n/a	n/a	+	+	+	n/a	+	+	++	+	+	n/a	+
Direct / Indirect						n/a	I/D		I	n/a	I	n/a	n/a	I	I/D	I	n/a	I/D	I/D	D	I/D	I/D	n/a	I
Temporary / Permanent						n/a	T/P		T/P	n/a	P	n/a	n/a	T/P	T/P	T/P	n/a	T/P	T/P	P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	n/a	L/ GL	n/a	n/a	L	L	L/ GL	n/a	L/ GL /W	L	L/ GL /W	L/ GL /W	L	n/a	L
EQIA																								
Short Term	+	+	+	+	-/?	n/a	+	O	+	n/a	n/a	n/a	+	O	O		O	O	O	+	+	O	n/a	O
Medium Term	+	+	+	+	-/?	n/a	+	+	+	n/a	n/a	n/a	+	?	?		+	+	O	+	+	O	n/a	+
Long Term	+	+	++	+	-/?	n/a	+	+	+	n/a	n/a	n/a	+	+	+		+	+	+	++	+	+	n/a	+
Direct / Indirect	I	I	I	I	I	n/a	I	I	I/D	n/a	n/a	n/a	I/D	I/D	I/D		I/D	I	I/D	D	I/D	I	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P		T/P	T/P	T/P	T/P	P	T/P	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL /W	L/ GL /W	L/ GL /W	L	L/ GL /W	n/a	L	L/ GL /W	L/ GL	n/a	n/a	n/a	L/ GL	L/ GL	L/ GL		L/ GL	L/ GL /W	L	L/ GL /W	L/ GL /W	L	n/a	L
HIA																								
Short Term	+	+	+		-/?				+	n/a				O	n/a		n/a	O		O	O	+		O
Medium Term	+	+	+		-/?				+	n/a				?	n/a		n/a	O		+	+	+		+
Long Term	+	+	++		-/?				+	n/a				+	n/a		n/a	+		++	+	+		+
Direct / Indirect	I	I	I		I				D	n/a				I	n/a		n/a	I		D	D	D		D
Temporary / Permanent	P	P	T/P		T/P				P	n/a				T/P	n/a		n/a	T/P		T/P	T/P	P		T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL /W	L/ GL /W		L/ GL				L/ GL	n/a				L/ GL	n/a		n/a	L/ GL /W		L/ GL /W	L/ GL /W	L		L/ GL
CSIA																								
Short Term				+					+															
Medium Term				+					+															
Long Term				+					+															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/ GL					L/ GL															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.36 G8 Food Growing

Policy description

This policy supports the protection of existing allotments and the provision of spaces for community gardening, including food growing, within new developments. It also identifies the need to increase commercial food production in London.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy supports a range of measures which deliver health and wellbeing benefits across London. By encouraging food growth in allotments and gardens, this policy would facilitate healthier, more active lifestyles and support social integration and community cohesion. Allotments and community gardens can also help to increase education and awareness about healthier food and food sources. This policy also encourages gardens within schools, increasing education in school-age children, supporting healthier life choices from an early age.

Large-scale, commercial food production in London could help to increase the city's self-sufficiency and reduce associated transportation and freight costs when importing foods, offering potentially significant economic savings. At a local level, growing food can result in significant personal savings and reduce the cost of weekly food shops.

The growing of food commercially and locally would offer benefits to the local environment, increasing London's natural capital and supporting the city's biodiversity. Recommended techniques, such as green walls and roofs, can bring natural elements to the most built up parts of the city and improve the look and feel of an area thereby increasing positive feelings within the community. Reducing the transport of food, through commercial production, would facilitate improvements to local air quality and associated climate change impacts by reducing emissions from freight transport. Similarly, these natural areas could help to mitigate the effects of surface run off and ground water discharge by increasing the interception of water and improved soil stability.

Cumulative

This policy aligns with policies S1 Developing London's social infrastructure and G4 Local green and open space which support social integration and ensuring healthier food and resources for Londoners.

Recommendations

It was recommended that further information be provided on inclusive access to allotments. Targets for the provision of community gardening could be specified and the use of allotments and green roofs in offices, in addition to schools, could also be suggested.

GLA response

No changes were proposed to be made to the draft policy and the GLA advised that the design and location of would be implemented through borough plans.

Appraisal of finalised policy

No further appraisal is required as no changes were proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects, because there are no adverse linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional text was added to Paragraph 8.8.2 outlining that food growing spaces could be incorporated into community schemes, such as schools. This clarifies that food growing does not have to be restricted to new schools, but that innovative solutions across a range of locations should be considered, including existing facilities. This is likely to support food growing options across a range of community settings, and improve access for all Londoners. Further clarification text was also added to support that where sites are made available for food growing on a temporary basis, landowners and developers will need to be explicit over how long sites will be available to the community. This will enable communities to adapt and find alternative solutions to food growing opportunities, if required. These policy amendments have resulted in revisions to the scoring matrix below.

Table 37: G8 Healthy Food

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	+		n/a	+	n/a	+	n/a	O	O	O	n/a	n/a	+	+	n/a	+	n/a	+
Medium Term						+	+		n/a	+	n/a	+	n/a	+	O	O	n/a	n/a	+	+	n/a	+	n/a	+
Long Term						+	+		n/a	++	n/a	+	n/a	+	+	+	n/a	n/a	+	++	n/a	+	n/a	+
Direct / Indirect						I/D	I/D		n/a	I/D	n/a	I/D	n/a	I	I/D	I	n/a	n/a	I/D	I	n/a	I/D	n/a	I
Temporary / Permanent						T/P	T/P		n/a	T/P	n/a	T/P	n/a	T/P	T/P	T/P	n/a	n/a	T/P	P	n/a	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		n/a	L/GL	n/a	L/GL	n/a	L	L	L/GL	n/a	n/a	L/GL/W	L/GL/W	n/a	L/GL	n/a	L
EQIA																								
Short Term	n/a	+	+	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Medium Term	n/a	+	++	n/a	+	+	+	?	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	+	n/a	+	n/a	n/a
Long Term	n/a	+	++	n/a	+	+	+	?/+	n/a	+	+	+	n/a	n/a	n/a		n/a	n/a	n/a	++	n/a	+	n/a	n/a
Direct / Indirect	n/a	D	D	n/a	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	n/a	n/a	n/a		n/a	n/a	n/a	I	n/a	I/D	n/a	n/a
Temporary / Permanent	n/a	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	n/a	n/a	n/a		n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	L/GL/W	L	n/a	L/GL	L/GL	L/GL	L/GL	n/a	L/GL	L/GL	L/GL	n/a	n/a	n/a		n/a	n/a	n/a	L/GL/W	n/a	L/GL	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				n/a	?				O	n/a		O	+		+	n/a	+		+
Medium Term	+	+	++		n/a				n/a	?				O	n/a		O	+		+	n/a	+		+
Long Term	+	+	++		n/a				n/a	?				+	n/a		O	+		+	n/a	+		+
Direct / Indirect	D	D	D		n/a				n/a	I/D				I	n/a		I	D		I	n/a	I/D		I
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	T/P				T/P	n/a		T	P		T/P	n/a	T/P		T/P
Local / Greater London / Wider Region / Global	L/GL/W	L	L		n/a				n/a	L/GL				L	n/a		L/GL	L/GL/W		L/GL/W	n/a	L/GL		L/GL
CSIA																								
Short Term				+					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				D					D															
Temporary / Permanent				T/P					P															
Local / Greater London / Wider Region / Global				L/GL					L/GL															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.37 SI1 Improving air quality

Policy description

The policy supports improvements to London's air quality and that exposure to poor air quality, especially for vulnerable people, is reduced. All developments should propose methods which achieve either Air Quality Positive or Neutral outcomes depending on their scale. Where developments are unable to reduce emissions on-site, measures should be put in place elsewhere which deliver equivalent air quality benefits.

Initial appraisal and recommendations

Social, economic and environmental effects

Poor air quality is not evenly distributed across London, and more vulnerable communities are often disproportionately affected by air quality impacts. Improvements to London's air quality would therefore help to improve the health of the population, particularly vulnerable groups such as young children, elderly people and those with respiratory conditions. Improvements to health would also facilitate wider economic benefits by reducing healthcare costs associated with treating respiratory conditions and premature deaths.

Improvements to localised air quality would help to alleviate the impacts of climate change and the heat island effect in London. This would be achieved through the use of air quality assessments, air quality focus areas, low emission zones, air quality buffer zones and promotion of green infrastructure. This support for green infrastructure and open space would also help to protect habitats and species and improve London's natural capital. Green infrastructure and low emission zones would also promote an increase in energy efficiency in buildings, by using natural materials to cool buildings. This urban greening also has the potential to help improve the local character of an area and bring natural elements to the most built up and polluted areas of London.

Cumulative

This policy would complement policies T2 Healthy streets, T1 Strategic approach to transport T9 Funding transport infrastructure through planning and G7 Trees and woodland which relate to efficient transport and the promotion of active travel.

Recommendations

It was recommended that further information is provided on how current air quality can be improved and existing developments could be retrofitted to include design features which mitigate the effects of poor air quality (i.e. green infrastructure, sustainable transport, air handling systems).

It was also recommended that further information is added on the impact that transport would have on the viability of infrastructure projects in London. It was recommended that text is provided with regards to how air quality focus areas and buffer zones have been categorised and the building restrictions, monitoring and management techniques which should be adopted within them to ensure they meet emission requirements.

GLA response

Additional supporting text was included which clarifies the requirements of the air quality focus areas and buffer zones. The policy text was amended to clarify that the policy applies only to new developments and that the retrofitting and management of existing assets will be addressed through the London Environment Strategy and the Mayor's Transport Strategy.

Appraisal of finalised policy

In addition to the above, the policy will address how the different air quality management areas (e.g. air quality focus areas, buffer zones, ultra-low emission zones) have been defined and categorised. The policy will only make reference to mitigation strategies for new developments as these are the ones that it has primary control over.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Whilst this improvement in air quality is driven primarily by human health considerations, an improvement in air quality through reductions in NOx concentrations will have a positive impact on levels of atmospheric pollution at European designated sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional text has been added to Paragraph 9.1.1, setting out that the Mayor is committed to making air quality in London the best of any major world city, which means not only meeting and maintaining legal limits for Nitrogen Dioxide as soon as possible but also working to achieve World Health Organisation targets for other pollutants such as Particulate Matter. This additional text was used to clarify that the Mayor supports WHO targets.

This amendment further strengthens the policy narrative surrounding air quality, by aligning London's ambitions with the WHO, and their targets across a range of pollutants. This is likely to have positive health outcomes in the long term, particularly for higher risk groups such as those with respiratory conditions, pregnant women, children and older people.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 38: SI1 Improving air quality

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		?	+	n/a	n/a	n/a	+	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Medium Term						n/a	n/a		?	+	n/a	n/a	n/a	+	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Long Term						n/a	n/a		?	++	n/a	n/a	n/a	++	+	+	O	n/a	n/a	?	n/a	n/a	?	n/a
Direct / Indirect						n/a	n/a		D	I	n/a	n/a	n/a	D	D	D	I	n/a	n/a	I	n/a	n/a	I	n/a
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		L	L/ GL	n/a	n/a	n/a	L/ GL /W	L/ GL /W	L/ GL /W	L/ GL	n/a	n/a	L/ GL	n/a	n/a	L	n/a
EQIA																								
Short Term	?	?	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	O		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	++	n/a	n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	++	+		n/a	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I/D	n/a	n/a	I/D	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D	I/D		n/a	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L	L/ GL /W		n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a
HIA																								
Short Term	+	+	+		n/a				n/a	n/a				+	O		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+	+	+		n/a				n/a	n/a				+	O		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+	+	++		n/a				n/a	n/a				++	O		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I	I	I		n/a				n/a	n/a				D	D		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a				L/ GL /W	L/ GL /W		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.38 SI2 Minimising greenhouse gas emissions

Policy description

This policy supports the aspiration for major developments to be zero carbon and for emissions to be minimised through construction and operation. This would be achieved through the development of comprehensive energy strategies, the incorporation of energy efficiency measures which surpass the requirements of Building Regulations and the establishment of carbon offset funds.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would facilitate the development of energy efficient buildings. Increased energy efficiency of new homes, and retrospective improvements of existing homes, would help to reduce fuel cost and the risk of fuel poverty by making homes cheaper to run. More efficient developments would therefore contribute to improvements in local air quality and contribute to climate change mitigation and adaptation.

The adoption of appropriate energy management and monitoring systems, including the installation of innovative and affordable renewable energy generation systems and storage, would result in reduced energy consumption and associated greenhouse gases, and would help to reduce the heat island effect in London. This reduced energy consumption and increased resilience to climate change would have economic benefits across the capital, reducing heating and cooling costs and costs associated with managing more extreme weather.

This policy may require some retrofitting of existing buildings, for example through conversions, which could impact on the historical value of some older buildings. The impacts are likely to be short term and dependent on local context and the scale of the intervention necessary.

Cumulative

The policy complements policies S2 Health and social care facilities, SI1 Improving air quality, E9 Skills and opportunities for all and G6 Biodiversity and access to nature which support the reduction of airborne pollutants and climate change mitigation. Furthermore, the combination of policies support the provision of healthy active lifestyles, which is an equal opportunity to all Londoners.

Recommendations

It was recommended that further information be provided with regards to carbon off-setting funds. It was also recommended that this policy could cover transport and how sustainable transport options could contribute to reducing greenhouse gases.

An additional recommendation to provide information on the specific details of policies around climate change adaptation and mitigation was made, for example how net zero carbon would be achieved.

GLA response

Minor changes to the draft policy were made. The GLA advised that the availability and appropriateness of carbon off-set funds will be determined by local planning authorities with the GLA providing further specific guidance on off-setting.

The GLA also advised that other policies in the Plan covered recommendations such as sustainable transport options. The GLA further advised that details regarding specific climate change policies would be contained in a number of guidance documents produced by the GLA, which will be updated more regularly than the London Plan. Any submitted energy assessment is reviewed by GLA officers to determine whether onsite measures have been maximised.

The GLA removed the statement relating to the impacts on local air quality as a result of reducing greenhouse gas emissions, as air quality is comprehensively covered in Policy SI1.

Appraisal of finalised policy

No further appraisal is required as no significant changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy provides a positive environmental commitment. There are no adverse impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. Additional text has been added to part DB of the policy, setting out that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment, and demonstrate actions taken to reduce life-cycle carbon emissions.

Additional text has also been added to Paragraph 9.2.9 of the supporting text. This provides further detail on the whole life-cycle approach to carbon capture. This includes the need to capture unregulated emissions, embodied emissions and emissions associated with maintenance and eventual material disposal. The additional text also sets out the requirement for major non-referable developments to calculate unregulated emissions, and are encouraged to undertake whole life-cycle assessments. Additional text was added to Paragraph 9.2.10, setting out that the Mayor will publish further planning guidance on whole life-cycle carbon emissions assessment, and actions to reduce life-cycle carbon emissions for development proposals referable to the Mayor.

This strengthens the policy narrative surrounding carbon reduction for major developments across London, and supports developers and local authorities in undertaking the appropriate assessments. More rigorous carbon assessments could help to improve health outcomes for communities across London by reducing exposure to harmful emissions. It will also support improved environmental outcome and could help to reduce adverse impacts associated with climate change in the long term.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 39: SI2 Minimising greenhouse gas emissions

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	O	-	n/a	n/a	n/a
Medium Term						?	+		?	+	+	n/a	n/a	?	++	++	+	n/a	n/a	O	?	n/a	n/a	n/a
Long Term						?	+		?	+	+	n/a	n/a	+/?	++	++	++	n/a	n/a	+	?	n/a	n/a	n/a
Direct / Indirect						D	D		D	I	I	n/a	n/a	I	D	D	D	n/a	n/a	D	D	n/a	n/a	n/a
Temporary / Permanent						P	P		T/P	P	P	n/a	n/a	T/P	T/P	P	P	n/a	n/a	P	T/P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	L		L/GL/W	L	L	n/a	n/a	L/GL	W	L/GL	L/GL	n/a	n/a	W	L/GL	n/a	n/a	n/a
EQIA																								
Short Term	O	O	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Medium Term	+	+	+	n/a	n/a	?	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		+	n/a	n/a	?	n/a	n/a	n/a	n/a
Long Term	+	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a	n/a	?	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	D	n/a	n/a	I	n/a	n/a	n/a	n/a	I	n/a	n/a	I	I		D	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	T	n/a	n/a	T/P	n/a	n/a	n/a	n/a	P	n/a	n/a	T/P	T/P		P	n/a	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	n/a	n/a	L	n/a	n/a	n/a	n/a	L	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	L/GL	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	+		+				n/a	n/a				O	O		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				O	O		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				O	O		++	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	D		D				n/a	n/a				I	I		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T		P				n/a	n/a				T/P	T/P		P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L	L/GL		L/GL	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

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20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.39 SI3 Energy infrastructure

Policy description

This policy supports the aspiration for boroughs and developers to engage with energy companies early on in the design process to identify future energy requirements arising from large scale developments and planning the energy infrastructure accordingly. Any large-scale development should be designed with an Energy Masterplan which identifies current energy capacity and potential future energy provision.

This policy also aims to promote the adoption of communal heating systems, which follow the heating hierarchy, within Heat Network Priority areas.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy supports the adoption of less polluting energy techniques, promoting low carbon and renewable energy sources. This policy outlines the need to identify and establish future energy needs in opportunity areas, town centres and other significant developments to build resilience and ensure capacity is managed. Energy masterplans offer a number of benefits, ensuring opportunities for energy efficiency in new developments are identified at the early stages. These masterplans include a number of important measures such as the utilisation of energy from waste schemes, improving London's waste management control, and the use of communal heat networks to provide energy in a more efficient, and potentially cost-effective way. The policy also supports improvements to existing infrastructure, increasing resilience further and reducing waste and leaks. This improved efficiency and potential cost savings outlined in this policy would therefore help to improve London's economic growth and increase resilience within the economy.

The adoption of more sustainable supplies of energy would result in many environmental benefits. It would help to improve local air quality and improve climate change adaptation and mitigation by reducing associated emissions and waste. This would consequently have a number of social benefits, reducing issues such as ill-health caused by poor air quality and the risk of fuel poverty caused by energy inefficiency in homes.

Cumulative

This policy complements policies G4 Local green and open space and SI4 Managing heat risk, which collectively could increase energy efficiency and mitigate against the social and environmental effects of energy production and consumption.

Recommendations

It was recommended that information was provided on the affordability of energy and its contribution to developing inclusive communities. In addition, it was recommended that the benefits and potential cost implications of heat networks for consumers were highlighted.

It was also recommended that further detail was provided on how the adoption of cleaner energy generation will be encouraged and incentivised.

GLA response

Additional text was added which references the CIBSE code of practice, which details how heat networks should be specified to be efficient and cost-effective for occupiers. This policy was also amended to include reference to the London Environment Strategy which contains further details on initiatives which support the implementation of low carbon energy generation.

Appraisal of finalised policy

In addition to the above, this policy would address how district heat networks should be designed to be efficient and cost-effective ensuring good value for its customers. The policy would make reference to the recommendations made in the London Environment Strategy on the implementation of low carbon energy generation. This does not change the overall assessment outcomes, but adds further clarity.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy promotes the development of London's energy system, but does not specifically identify any location, or type of energy related development. Dependent on the location or type of development, potential impact pathways could exist (such as changes in hydrology, disturbance from construction/ operational activities, interrupting flight lines), however this policy does not provide specifically for any location or type of development. Moreover, it also has positive air quality dimensions regarding reduction of NOx emissions. As such there are no impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy text. Wording amendments have been made to Part D1 (e) of the policy, removing reference to the use of low-emission combined heat and power in areas where legal air quality limits are exceeded. The removal of the reference to air quality exceedance areas has been undertaken to ensure that air quality impacts are considered more widely in line with Policy SI1, and not only within designated areas. This cross-reference has been added to part D2 of the policy to ensure that air quality objectives are being met more broadly.

This amendment strengthens the inclusive nature of the policy, ensuring that all communities can benefit from improved infrastructure provision. A reduction in the emission of harmful pollutants as a result of low-emission combined heat and power could help to limit the potentially negative impacts associated with air quality on communities across London. This is particularly important for equalities groups, such as those with existing respiratory conditions, young children and older people.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 40: SI3 Energy infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	?		n/a	+	+	n/a	n/a	O	?	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a
Medium Term						n/a	?		n/a	+	+	n/a	n/a	O	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Long Term						n/a	?		n/a	+	+	n/a	n/a	+	?	+	++	n/a	n/a	n/a	n/a	+	n/a	n/a
Direct / Indirect						n/a	D		n/a	D	I	n/a	n/a	I	D	I	D	n/a	n/a	n/a	n/a	I	n/a	n/a
Temporary / Permanent						n/a	P		n/a	P	T/P	n/a	n/a	T/P	P	T/P	P	n/a	n/a	n/a	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		n/a	L	L	n/a	n/a	L	L/GL	L	L/GL	n/a	n/a	n/a	n/a	L	n/a	n/a
EQIA																								
Short Term	n/a	n/a	?	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	O	?		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+/?	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+/?	?		++	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+		++	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I	n/a	I/D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	I	D		D	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P	P		P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L	n/a	L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L	L/GL		L/GL/W	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	?		+				n/a	n/a				O	?		+	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a	n/a	+/?		+				n/a	n/a				O	?		+	n/a		n/a	n/a	n/a		n/a
Long Term	n/a	n/a	+		+				n/a	n/a				+	?		+	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	I		D				n/a	n/a				I	D		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	T/P		T/P				n/a	n/a				T/P	P		T/P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				L	L/GL		L	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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8. To maximise accessibility for all in and around London
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10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
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15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
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21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.40 SI4 Managing heat risk

Policy description

The policy aims to minimise heat gains of new developments through their design, layout, orientation and materials. Energy strategies should be produced for all major developments which demonstrate how the cooling hierarchy has been incorporated into the design to minimise the potential for overheating and reliance on air conditioning systems.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would encourage new developments to be designed and constructed to ensure they have the ability to cope with elevated temperatures and include an adequate provision of cooling and ventilation. This would minimise the urban heat island effect and overheating, which can have adverse health effect, particularly on higher risk groups such as young children, older people, and those with existing health conditions.

The policy promotes temperature regulation through high quality design, including ventilation, insulation, shading, green infrastructure and orientation. These features would increase energy efficiency by shading buildings with natural materials, and would support climate change adaptation and mitigation. The use of features such as green infrastructure would also increase biodiversity and natural capital across the city, even in the most built up areas.

Cumulative

Implementation of the policy could complement policies E2 Low cost business space and D3 Inclusive design which support and encourage developments with incorporated heat risk design to reduce energy consumption and increase efficiency.

Recommendations

It was recommended that further information is provided on how existing buildings could be retrofitted to avoid overheating and minimise the impacts of elevated temperatures.

GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that that it is more appropriate for further information and clarification to be provided by the London Environment Strategy (for example retrofitting of existing buildings) and by boroughs through local plans.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added to Paragraph 9.4.4, setting out that passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution. This amendment has been incorporated to reinforce passive ventilation as a priority, and to reference the influence of air quality and noise considerations on the choice of solutions.

The consideration of air quality and noise in managing heat risk could improve health outcomes for local communities and neighbouring uses. This includes reducing exposure to harmful emissions, and minimising noise disturbance, which can be detrimental to physical and mental health depending on duration and frequency.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 41: SI4 Managing heat risk

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		n/a	+	O	n/a	n/a	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	?
Medium Term						n/a	+		n/a	+	O	n/a	n/a	+	+	+	+	n/a	n/a	+	n/a	n/a	n/a	?
Long Term						n/a	+		n/a	+	O	n/a	n/a	+	++	++	++	n/a	n/a	+	n/a	n/a	n/a	+/?
Direct / Indirect						n/a	I		n/a	I	I	n/a	n/a	I	D	D	D	n/a	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent						n/a	P		n/a	P	P	n/a	n/a	P	P	P	P	n/a	n/a	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global						n/a	L/ GL		n/a	L/ GL	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	L
EQIA																								
Short Term	n/a	n/a	+	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+		+	n/a	n/a	+	n/a	n/a	n/a	?
Medium Term	n/a	n/a	+	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	?	+		+	n/a	n/a	+	n/a	n/a	n/a	+/?
Long Term	n/a	n/a	++	n/a	?	?	+	n/a	n/a	n/a	n/a	n/a	n/a	+/?	++		++	n/a	n/a	+	n/a	n/a	n/a	+/?
Direct / Indirect	n/a	n/a	I	n/a	I	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I	D		D	n/a	n/a	I	n/a	n/a	n/a	I
Temporary / Permanent	n/a	n/a	P	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P		P	n/a	n/a	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	L/ GL	n/a	n/a	n/a	L
HIA																								
Short Term	n/a	n/a	+		?				n/a	n/a				?	+		+	n/a		+	n/a	n/a		?
Medium Term	n/a	n/a	+		?				n/a	n/a				?	+		+	n/a		+	n/a	n/a		+/?
Long Term	n/a	n/a	++		?				n/a	n/a				+/?	++		++	n/a		++	n/a	n/a		+/?
Direct / Indirect	n/a	n/a	I		D				n/a	n/a				I	D		D	n/a		I	n/a	n/a		I
Temporary / Permanent	n/a	n/a	P		P				n/a	n/a				P	P		P	n/a		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		L/ GL				n/a	n/a				L/ GL	L/ GL		L/ GL	n/a		L/ GL	n/a	n/a		L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.41 SI5 Water infrastructure

Policy description

The policy ensures that water supplies and resources are protected and conserved in a sustainable manner which minimises the use of mains water and reduces leakage levels. The policy also supports investment in water supply infrastructure and waste water treatment infrastructure with the aim of protecting water quality and the water environment.

Initial appraisal and recommendations

Social, economic and environmental effects

Investment in water infrastructure, including smart metering, the replacement of ageing infrastructure and the adoption of circular economy practices, would all contribute to efficient and secure water management. This would improve London's resilience to future climate change, in addition to cost-savings associated with reducing water leakages and improved efficiency.

By ensuring new developments are designed with adequate water capacity and no miso-connections between foul and surface water networks, the risk of leakages and pollution would be managed, facilitating improvements to water quality within river tributaries. Improvements to water which flows through London's public spaces and parks could help to protect the local flora and fauna and ensure these spaces remain healthy, attractive and safe.

Cumulative

This policy aligns with policies SI4 Managing heat risk and G9 Geodiversity which support the protection of geodiversity and managing heat risk. Water supplies rely upon geological traits and local temperature, which effect evaporation rates, to protect and conserve water supplies. The combined conservation of water supplies through these policies will help protect the overall water environment.

Recommendations

It was recommended that further information is provided on opportunities for retrofitting of existing developments with water infrastructure to make them more water efficient. It was also recommended that additional information is inserted into the policy which describes the types of 'corrective actions' which could be used to improve water quality within the tributaries and how pollution to these tributaries will be minimised in the future.

It was also recommended that although the policy highlighted that tributary pollution is a significant threat, it was unclear how it will be reduced.

GLA response

The GLA clarified wording in relation to the types of 'corrective action' that might be used to improve water quality, however advised that further details would be found in the Mayor's environment Strategy. The GLA further advised that in respect of retrofitting of existing buildings, this again was dealt with the Mayor's Environment Strategy.

In relation to the pollution of tributaries, the GLA advised that this is a maintenance/management issue and therefore more appropriate for the Environment Agency and the River Basin Management Plan to address.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy that aims to conserve and protect water resources in a sustainable manner. It provides for new residential development to minimise use of mains water, thus reducing pressure upon water resources in the natural environment that may interact with European designated sites.

This policy also promotes the improvement of water quality and the water environment, which could also have a positive impact upon hydrologically connected European designated sites. This policy provides for 'sustainable' waste water treatment infrastructure, which by definition would not have an adverse impact upon European designated sites. This includes future proofing development so that future misconnections between foul and surface water networks are not easily created.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. These include reflecting the update to Thames Water's draft Water Resource Management Plan, which sets out the preferred approach to strategic water supply options to serve London and parts of the Wider South East. An additional option has been added to Paragraph 9.5.4, which includes direct river abstraction from the Thames linked to augmenting river flows using treated sewage works effluent in east and west London. The supporting text also supports a more strategic approach to water supply networks to ensure future water resilience, and is likely to further protect and enhance London's water bodies, ensuring a sustainable water supply.

Additional wording is also provided in Paragraph 9.5.10, setting out that Thames Water is taking a long-term approach to drainage and wastewater management planning. This includes identifying the most appropriate strategy for ensuring London's systems can meet the needs of London over the next 80 years in the most sustainable way. This strengthens the policy narrative surrounding long term water and drainage resilience, and is likely to support beneficial outcomes across a range of environmental and health objectives. These policy amendments have resulted in revisions to the scoring matrix below.

Table 42: SI5 Water infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	+	n/a
Long Term						n/a	n/a		n/a	+	++	n/a	n/a	n/a	+	n/a	n/a	++	++	+	n/a	n/a	+	n/a
Direct / Indirect						n/a	n/a		n/a	I	I	n/a	n/a	n/a	I	n/a	n/a	D	D	D	n/a	n/a	D	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L/GL/W	L/GL	n/a	n/a	n/a	L/GL	n/a	n/a	L/GL	L	L	n/a	n/a	L/GL	n/a
EQIA																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+		?	+	+	+	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+		?	+	+	+	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a	n/a	n/a	+		?	+	++	+	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	I/D		I/D	D	I	I	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P		T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL		L/GL	L/GL	L/GL	L	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	?		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	+		+	n/a	?		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	++		+	n/a	?		n/a
Direct / Indirect	n/a	n/a	I/D		n/a				n/a	n/a				n/a	n/a		n/a	D		D	n/a	I		n/a
Temporary / Permanent	n/a	n/a	T/P		n/a				n/a	n/a				n/a	n/a		n/a	T/P		T/P	n/a	T/P		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L/GL		n/a				n/a	n/a				n/a	n/a		n/a	L/GL		L	n/a	L		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.42 SI6 Digital connectivity

Policy description

This policy encourages greater digital connectivity to ensure London's global competitiveness now and in the future through the appropriate provision of digital infrastructure in developments and public realm design. It also supports the extension and enhancement of mobile digital infrastructure to provide improvements in mobile connectivity both within developments and surrounding areas.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy supports affordable and accessible digital infrastructure, to encourage a culture of equality in future service provision, ensuring all Londoners can actively participate in the wider opportunities the city has to offer. Good quality digital infrastructure can increase access to important information sources including job opportunities, health advice, education and learning, shopping and leisure activities. For less mobile individuals, digital connectivity can be particularly important as it increases access to services and support which may be difficult to access physically.

Implementation of this policy would support a productive and resilient economy which could accommodate increasing connectivity for public and private sectors and drive economic activity in the 21st Century. Increasing access to digital infrastructure and services also has the ability to encourage regeneration and associated economic opportunities, such as business growth and job creation. As part of improving London's overall resilience, this policy also considers the need for secure digital infrastructure, particularly in commercial terms.

Improved access to digital data and services can also improve other sectors which rely on internet connectivity, such as education, or those which can be enhanced by better use of digital data and services, such as cultural or historic sites. This policy could also indirectly support the development of innovative technologies which could contribute to improved management in industries, such as waste management or air quality monitoring.

Cumulative

The policy complements policies T2 Healthy streets, S1 Developing London's social infrastructure, HC5 Supporting London's cultural and creative industries and G4 Local green and open space which support the promotion of equal participation and social inclusion. Additionally, the policy could support the development of innovative technologies and creative industries that boost economic growth within London.

Recommendations

It was recommended that further information be provided on the potential for high quality and secure digital infrastructure to promote regeneration opportunities. It was also recommended that it is clarified that the policy does not directly ensure good connectivity but instead provides the infrastructure for service providers to use.

GLA response

No changes are proposed to be made to the draft policy, although amendments were made to the supporting text to regenerative opportunities of the provision of high quality and secure digital infrastructure. The GLA also clarify that the service providers are responsible for delivering connectivity across the city and the policy represents what planning is able to do about the issue.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant impacts. The policy could be positive for European sites. Providing increased digital infrastructure, could increase remote networking opportunities (e.g. video conferencing and file sharing) and thus reduce the need for the number of journeys for work.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added to Paragraph 9.6.4 stating that development proposals should demonstrate that mobile connectivity will be available throughout the development, and should not have detrimental impacts on the digital connectivity of neighbouring buildings. The supporting wording sets out how early consultation with operators will help to identify adverse impacts and potential mitigation measures required. This additional wording strengthens the policy narrative surrounding high quality and consistent connectivity across new developments, and protects existing uses from adverse impacts.

Additional text has also been provided supporting that network operators can access rooftops of new developments where an improvement to the mobile connectivity of an area can be identified. The supporting text also supports exploring opportunities for mobile connectivity improvements, such as through the creative use of the public realm. This is likely to positively contribute to London's overall connectivity and economic growth, and could improve access to digital infrastructure for a range of communities. These policy amendments have resulted in revisions to the scoring matrix below.

Table 43: SI6 Digital Connectivity

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	?		n/a	+	+	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Medium Term						n/a	?		n/a	+	+	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Long Term						n/a	?		n/a	+	++	?	?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	?	n/a
Direct / Indirect						n/a	I		n/a	D	D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	I	n/a
Temporary / Permanent						n/a	T/P		n/a	P	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	P	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL /W		n/a	L/GL /W	L/GL /W	L/GL /W	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	L	n/a
EQIA																								
Short Term	+	+	+	+	n/a	?	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	+	+	+	+	n/a	+	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	++	+	+	+	n/a	+	n/a	n/a	+	++	++	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I/D	I/D	I	I	n/a	I	n/a	n/a	I	I	I	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	T/P	T/P	P	T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L	L/GL /W	n/a	L/GL /W	n/a	n/a	L	L	L/GL	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Medium Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	?	n/a		n/a
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
CSIA																								
Short Term				O					n/a															
Medium Term				O					n/a															
Long Term				O					n/a															
Direct / Indirect				D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L/GL /W					n/a															

Objectives

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- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.43 SI7 Reducing waste and supporting the circular economy

Policy description

This policy supports the adoption of the waste hierarchy whereby the volume of waste is reduced and the levels of re-use and recycling are maximised. This will be achieved through the promotion of the Circular Economy model which improves resource efficiency and innovation so materials can be kept at their highest use for as long as possible.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy would facilitate the preparation of Circular Economy Statements for strategic developments which will detail how waste will be minimised, managed and sorted. Circular Economy Statements of this kind would help to reduce the environmental impact of high density developments by considering the end of life potential of buildings and the inherent value of demolition materials. The policy therefore encourages a reduction in waste generation and maximises re-use. This reduction would result in less vehicles required to transport raw materials and waste, which would positively impact local air quality by reducing associated carbon emissions and reduce local noise disturbance associated with transport and waste processing.

This policy would positively contribute to the local economy as it contains a variety of measures which help facilitate London's productivity and economic resilience, whilst supporting the adoption of business practices which reduce the costs, emissions and in-direct impacts (e.g. pollution) of raw material extractions and consumption.

Cumulative

This policy aligns with policies SI3 Energy infrastructure, D3 Inclusive design and SI9 Safe guarding waste sites which collectively support a change in waste management from a linear to circular economy. Additionally, the policies could reduce business costs, increase efficiency and provide economic growth options.

Recommendations

It was recommended that further information was provided on the design implications associated with efficient waste management both for new developments and existing buildings. It was also recommended that additional information be provided on how the adoption of Circular Economy principles could impact SMEs and how it could be incentivised to ensure it is adopted across multiple sectors.

It was recommended that further guidance is provided on how Circular Economy Statements would be implemented and practical examples of how the waste management and monitoring requirements of them could be implemented.

GLA response

No changes to the draft policy were made, although amendments were made to the supporting text to provide additional guidance. The GLA identified that it was more appropriate for further information and clarification to be provided by individual Boroughs and through the London Environment Strategy and not the London Plan.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive and provides for a reduction in waste and improves resource efficiency. This has potential to reduce resource use such as water and energy and thus reduce atmospheric pollution contributions. There are no adverse impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional text was provided as Paragraph 9.7.4A recognising that the particular characteristics of excavation waste are such that it is extremely difficult to recycle this waste stream. As a result the target identified in Policy SI7 has been amended to apply to construction and demolition waste only. It is not expected that this amendment will significantly alter the outcomes of the policy, and will continue to support waste reduction and the circular economy. As a result, no changes to the scoring matrix have been made.

Table 44: SI7 Reducing waste and supporting the circular economy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		O	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Temporary / Permanent						n/a	I		I/D	I/D	n/a	n/a	n/a	D	I	I	D	n/a	n/a	n/a	n/a	I	D	D
Direct / Indirect						n/a	P		T	P	n/a	n/a	n/a	P	P	P	P	n/a	n/a	n/a	n/a	P	P	P
Local / Greater London / Wider Region / Global						n/a	L		L	L/ GL	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
EQIA																								
Short Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Long Term	n/a	n/a	n/a	n/a	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	++
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	P	n/a	P	n/a	P	P		P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	L/ GL	n/a	L/ GL	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
HIA																								
Short Term	n/a	n/a	n/a		n/a					n/a	n/a				?	O		?/+	n/a		n/a	n/a		?/+
Medium Term	n/a	n/a	n/a		n/a					n/a	n/a				?	O		?/+	n/a		n/a	n/a		?/+
Long Term	n/a	n/a	n/a		n/a					n/a	n/a				?	O		?/+	n/a		n/a	n/a		?/+
Temporary / Permanent	n/a	n/a	I		n/a					n/a	n/a				D	I		I	n/a		n/a	n/a		D
Direct / Indirect	n/a	n/a	P		n/a					n/a	n/a				P	P		T/ P	n/a		n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		n/a					n/a	n/a				L	L		L	n/a		n/a	n/a		L
CSIA																								
Short Term				n/a						n/a														
Medium Term				n/a						n/a														
Long Term				n/a						n/a														
Temporary / Permanent				n/a						n/a														
Direct / Indirect				n/a						n/a														
Local / Greater London / Wider Region / Global				n/a						n/a														

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.44 SI8 Waste capacity and net waste self-sufficiency

Policy description

This policy ensures existing waste management provisions are safeguarded and optimised with the aspiration of London becoming net self-sufficient, in terms of waste, by 2026. This will be achieved by encouraging the installation of a variety of processing facilities, the adoption of Circular Economy principles and energy from waste schemes. It also encourages all new developments and waste sites to adopt carbon efficient waste management practices which provide additional environmental, social and economic benefits.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy supports London become a more self-sufficient city, in terms of waste management. This action would help to build resilience in the London economy, reducing costs associated with the transport and management of waste elsewhere and reducing the reliance on others. Additionally, the development of new waste management sites, and the intensification of existing ones, would support job creation, skills, training and apprenticeship opportunities.

Environmental benefits would be gained from the implementation of this policy, reducing the impacts waste management facilities have on surrounding areas by increasing appropriate and more efficient waste management, including reducing vehicle movements. This could also facilitate improvements in local air quality and reductions in nuisance noise, both of which can have negative health implications. Additionally, the policy contributes to renewable energy generation and reductions in greenhouse gas emissions from waste processing and associated transport.

Cumulative

This policy would complement policies H11 Ensuring the best use of stock and D6 Optimising housing density which support re-using existing brownfield land for industrial and housing locations that could limit construction and household waste through maximising existing waste networks.

Recommendations

It was recommended that additional information is provided on the sustainable transport of waste, in particular the adverse health effects of emissions to vulnerable populations. It was also recommended that additional information is provided on how noise impacts could be mitigated. These could include restrictions on operating hours, appropriate road surfaces and innovative waste processing techniques.

GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity.

The GLA advised that other policies, such as noise, agent of change and freight, addressed other recommendations. The GLA also advised that it was more appropriate for further information and

clarification to be provided by the boroughs through local plans and based on site-specific detail such as open hours.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The positive policy aims for net self-sufficiency by 2026 and includes for new waste management sites where required, which should reduce the need for waste to be exported out of London for processing.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. Additional wording has been added to Paragraph 9.8.3 setting out that boroughs will need to ensure sufficient sites are provided for those waste streams they have to deal with that the London Plan does not set out apportionments for. This is with the exception of excavation waste. The additional supporting text also supports joint working across authority boundaries, particularly to address the issues around excavation waste. This wording amendment clarifies that there are other waste streams that need to be planned for, and there is a need for ongoing joint working. These policy amendments have resulted in revisions to the scoring matrix below.

Table 45: SI8 Waste capacity and net waste self-sufficiency

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Medium Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	+	?/+
Long Term						n/a	?		+	+	n/a	n/a	n/a	?	+	?	+	n/a	n/a	n/a	n/a	?	++	?/+
Direct / Indirect						n/a	I		I/D	I/D	n/a	n/a	n/a	D	I	I	D	n/a	n/a	n/a	n/a	I	D	D
Temporary / Permanent						n/a	P		T	P	n/a	n/a	n/a	P	P	P	P	n/a	n/a	n/a	n/a	P	P	P
Local / Greater London / Wider Region / Global						n/a	L		L	L/ GL	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a	n/a	L	L	L
EQIA																								
Short Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+
Medium Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	+	+/?
Long Term	n/a	n/a	+	n/a	n/a	n/a	?	n/a	n/a	+	n/a	+	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	++	+/?
Temporary / Permanent	n/a	n/a	I/D	n/a	n/a	n/a	I	n/a	n/a	I/D	n/a	I/D	n/a	I/D	I/D		D	n/a	n/a	n/a	n/a	n/a	D	I/D
Direct / Indirect	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	P	n/a	P	n/a	P	P		P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL	n/a	n/a	n/a	L	n/a	n/a	L/ GL	n/a	L/ GL	n/a	L	L		L	n/a	n/a	n/a	n/a	n/a	L	L
HIA																								
Short Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Medium Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Long Term	n/a	n/a	+		n/a				n/a	n/a				?	+		?/+	n/a		n/a	n/a	n/a		?/+
Direct / Indirect	n/a	n/a	I		n/a				n/a	n/a				D	I		I	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	P		n/a				n/a	n/a				P	P		T/ P	n/a		n/a	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		n/a				n/a	n/a				L	L		L	n/a		n/a	n/a	n/a		L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.45 SI10 Aggregates

Policy description

The policy ensures the adequate supply of sustainably sourced aggregate to support construction in London. This will include encouraging the re-use and recycling of construction material and its transportation by sustainable transport modes. Where aggregate extraction is required, where ever possible, this would be within London and would ensure local plans are in place to mitigate the environmental and infrastructure impacts associated with extraction.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy supports the sustainable use of locally-sourced aggregate material across London. This would ensure the delivery of material for new development, facilitating growth the delivery of important physical infrastructure, such as housing or industry units.

Implementation of this policy would ensure the use of more sustainable transport modes to move aggregate through the city. A reduction in land-based vehicle movements would result in improved local air quality, reductions in localised noise generation and minimise carbon emissions. Poor air quality and excess noise can have negative health and wellbeing implications, and therefore this improved efficiency offers wider social benefits.

This policy sets out a target of 95% re-use and recycling of construction, demolition and excavation materials by 2020. This would reduce the overall volume of waste sent for disposal and follows the principles of the Circular Economy. This would be a more cost-effective method of managing waste by reducing costs associated with transport, waste disposal and resource provision.

This policy also has the potential to provide wider environmental benefits through the use of planning conditions to support the aftercare of aggregate extraction sites, which could include methods such as the installation of green infrastructure and the protection of biodiversity.

It is however noted that the process of extracting and transporting aggregates could result in adverse impacts on archaeological remains and other heritage features, if not managed appropriately.

Cumulative

This policy aligns with policies H1 Increasing housing supply, S1 Developing London's social infrastructure, E11 Sector growth opportunities and spatial clusters and T9 Funding transport infrastructure through planning which support the delivery of development and require local sustainably sourced aggregates for construction.

Recommendations

It was recommended that further information was provided on the types of aftercare that could be promoted through planning conditions. It was also recommended that additional information is provided on the level of processing required to beneficially re-use demolition, excavation and construction waste and any associated environmental impacts on air quality, noise generation, heritage

and carbon emissions which could arise as a result of this. Mitigation measures for these impacts will be assessed by local boroughs taking into account site-specific and local conditions.

GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity. The GLA advised that it was more appropriate for further information and clarification to be provided by borough through local plans on the recommendations. Specifically, mitigation would depend on local site specific circumstances.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive in that it explicitly directs movement of aggregates to be by sustainable transport modes where possible, which would reduce the number of HGV movements involved. This is particularly relevant for London Borough of Redbridge given the presence of Epping Forest SAC within the borough and the air quality sensitivity of that site.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional text has been provided to part B of the policy, supporting the sufficient capacity of aggregate wharves and aggregate rail depots to ensure an adequate supply of imported and marine aggregates to London. This additional text strengthens the policy narrative surrounding the safeguarding of processing facilities, particularly as London imports over 97% of its aggregates. This is likely to support positive economic outcomes, including facilitating the construction industry and maintain London's economic competitiveness.

Additional wording provided in the policy text to support the production of recycled aggregates, and expand the capacity at aggregate wharves, rail depots and quarries within or adjacent to major construction projects. By encouraging the supply of aggregated within close proximity of construction sites, this could reduce the need to move aggregates by road to construction sites, and could help to reduce noise pollution.

Further clarification text has also been added to part D of the policy. This text relates to the Agent of Change principle for new aggregate facilities, ensuring that planning conditions are imposed on new aggregate facilities so that noise, dust, and traffic impacts are effectively controlled. The additional text also states that new development in close proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle. These amendments strengthen the policy narrative surrounding the compatibility of land uses. This is likely to ensure positive outcomes for surrounding communities, to ensure they are protected from adverse noise, dust and

traffic impacts associated with aggregates facilities. These policy amendments have resulted in revisions to the scoring matrix below.

Table 46: SI10 Aggregates

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	+	?/-	n/a	+	+/?
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	+	?	n/a	n/a	n/a	n/a	+	?/-	n/a	+	+/?
Long Term						n/a	n/a		n/a	+	++	n/a	n/a	+	+	n/a	n/a	n/a	n/a	+	?/-	n/a	+	+/?
Direct / Indirect						n/a	n/a		n/a	D	D	n/a	n/a	I	I	n/a	n/a	n/a	n/a	D	I	n/a	I	I
Temporary / Permanent						n/a	n/a		n/a	P	P	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	P	T/P	n/a	P	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L	L	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL	n/a	L/GL	L
EQIA																								
Short Term	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Medium Term	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	?		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Long Term	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+		n/a	n/a	n/a	+	n/a	n/a	+	+/?
Direct / Indirect	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I	I		n/a	n/a	n/a	D	n/a	n/a	D	I
Temporary / Permanent	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P		n/a	n/a	n/a	P	n/a	n/a	P	P
Local / Greater London / Wider Region / Global	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL	L/GL		n/a	n/a	n/a	L/GL	n/a	n/a	L/GL	L
HIA																								
Short Term	+/?	n/a	+/?		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		+/?
Medium Term	+	n/a	+		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		+/?
Long Term	+	n/a	+		n/a				n/a	n/a				+	O		n/a	n/a		+	n/a	n/a		+/?
Direct / Indirect	I	n/a	I		n/a				n/a	n/a				I	I		n/a	n/a		D	n/a	n/a		I
Temporary / Permanent	T/P	n/a	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/GL	n/a	L/GL		n/a				n/a	n/a				L/GL	L/GL		n/a	n/a		L/GL	n/a	n/a		L
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.46 SI12 Flood risk management

Policy description

This policy seeks to address the current and expected flood risk for all developments in a sustainable and cost-effective way. It encourages the production of flood risk assessments, development plans and surface-water management plans to manage and reduce the risks associated with flooding at a city-wide, borough-wide and development scale. This policy also supports the continuous maintenance and improvement of existing flood defence structures and their associated infrastructure.

It also supports collaborative working with the Environment Agency, Local Authorities and other relevant stakeholders to identify areas at risk of flooding and suitable mitigation strategies to protect communities within these areas.

Initial appraisal and recommendations

Social, economic and environmental effects

The provision of housing which is resilient and allows residents to remain safe and comfortable during flood events will be an important aspect of managing future climate change. This assurance and protection would be particularly important for more vulnerable groups, such as low-income communities, elderly residents or those with mobility issues, who may have limited access to alternative accommodation options during extreme weather events.

Implementation of this policy would minimise the wide scale damage and associated interruptions and delays to economic activity that flooding events can cause. Ensuring existing flood defences and well maintained and enhanced, and restricting building in high-risk flood areas will help to ensure economic productivity can be sustained during flood events and future climate change. This would limit associated clean-up costs and business disruption after extreme events, and reduce London's vulnerability in the future.

Implementation of the policy would encourage a catchment-wide approach to planning whereby space is set-aside for water storage during high rainfall events. These spaces could take the form of valuable green/open space which would enhance the local landscape and encourage biodiversity. Spaces of this kind would offer local residents access to good quality green and blue spaces to exercise in and provide mental and physical respite from the city.

Cumulative

This policy complements policies G5 Urban greening, G4 Local green and open space, SI13 Sustainable drainage and D2 Delivering good design which support the use of open green spaces for flood alleviation and well designed and integrated SUDs.

Recommendations

It was recommended that further information is given on how additional space for water management and filtration will be incorporated into new developments, and how they will connect to existing waterways and be used by local residents. It was also recommended that further detail is provided on

how flood risk could be mitigated in existing communities as well as on new developments. This could be particularly important for high risk flood areas which overlaps with deprived communities.

GLA response

The policy was amended to provide additional guidance and clarity in its readability.

The GLA advised that other policies in the Plan SI13 addressed issues such as water management and filtration.

The GLA clarified that the policy dealt with identifying areas where particular flood risk occurs and that it is for boroughs through local plans to develop actions and policies aimed at reducing those risks.

Appraisal of finalised policy

No further appraisal is required as changes made reflected clarification and improvements to readability, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy is positive as it aims to reduce flood risk by working across authority boundaries and utilising strategic documents. There are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional text has been added policy FA supporting natural flood management methods be employed in development proposals, due to their multiple benefits of flood storage, and creating recreational areas and habitats. This text strengthens the overall narrative surrounding managing flood risks associated with new developments, and provides additional opportunities for enhancing natural capital across London, and supporting a range of positive health and recreational outcomes. Changes to the scoring matrix as a result of this additional text is set out below.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 47: SI12 Flood risk management

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Medium Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a
Long Term						n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a
Direct / Indirect						n/a	n/a		n/a	I	I	n/a	n/a	n/a	D	n/a	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	n/a		n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	n/a		n/a	L	L	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	L/GL	n/a	n/a	n/a	n/a	n/a
EQIA																								
Short Term	n/a	n/a	+/?	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+/?	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+/?	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+/?	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	++	+	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D		n/a	I/D	D	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P		n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL		n/a	L/GL	L/GL	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	+/?		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+/?	n/a	n/a		n/a
Medium Term	n/a	n/a	+/?		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+/?	n/a	n/a		n/a
Long Term	n/a	n/a	+		n/a				n/a	n/a				n/a	n/a		n/a	n/a		+	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Direct / Indirect				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
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- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
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- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.47 SI13 Sustainable drainage

Policy description

The policy ensures that development proposals follow the drainage hierarchy, achieve greenfield run-off rates and ensure water run-off is managed as close to its source as possible. In addition, any drainage proposal should address issues of water use efficiency, water quality, biodiversity, amenity and recreation and the potential for flooding.

Initial appraisal and recommendations

Social, economic and environmental effects

Flooding events cause wide scale damage and interruption to London's economic activity. By ensuring London has an appropriate drainage strategy, this policy supports London's continued productivity and resilience, reducing direct clean-up costs and associated disruption to business from flood events. Designing developments, housing and utility services which remain functional during flooding events would also encourage a culture of equality whereby less mobile residents are not disproportionately impacted by high rainfall events.

The adoption of a wide variety of techniques to manage surface run-off, both as part of development proposals and the retrofitting existing buildings, will be important for building resilience. These could include the installation of blue and green roofs, porous surfaces and retention ponds. Effectively managing surface water run-off would minimise the risk of potential surface water contamination, soil degradation and erosion and improve overall water quality. By focussing on using sustainable features to manage water run-off, aspects of the natural environment will be protected and enhanced. New areas of green infrastructure could also be incorporated into developments which will encourage biodiversity and improve access for residents to functional public realm space. It would also contribute positively to the character and townscape of a local area.

Cumulative

This policy complements policies G5 Urban greening, SI12 Flood risk management and D2 Delivering good design which support flood alleviation schemes and well designed and integrated SUDs.

Recommendations

It was recommended that further information is provided on the ongoing maintenance of surface water management features. This would be particularly important for lower income households.

GLA response

Changes were made to the supporting text to include as reference to the ongoing maintenance of surface water management features.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no linking impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to Part B of the policy. The drainage hierarchy has been made shorter and more distinct, demonstrating a preference for green over grey features. The wording amendments also include using rainwater as a resource, such as using blue roofs for irrigation.

Additional wording has also been added to Paragraph 9.13.3 surrounding pollution prevention filtering measures, such as the use of soft engineering or green infrastructure. This also includes suitable storage being designed into the system. These amendments recognise additional aspects that affect discrete discharge into tidal waters, and strengthens the policy narrative of enhancing natural capital across the city. No changes to the scoring matrix have been made as a result of this policy.

Table 48: SI13 Sustainable drainage

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						n/a	O/?			n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	+/?	n/a	n/a
Medium Term						n/a	O/?			n/a	+	+	n/a	n/a	n/a	+	n/a	n/a	+	+	+	n/a	+/?	n/a	n/a
Long Term						n/a	O/?			n/a	++	+	n/a	n/a	n/a	+	n/a	n/a	++	++	+	n/a	+/?	n/a	n/a
Direct / Indirect						n/a	I			n/a	I/D	I/D	n/a	n/a	n/a	D	n/a	n/a	D	D	I	n/a	I	n/a	n/a
Temporary / Permanent						n/a	T/P			n/a	T/P	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L			n/a	L/ GL	L	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	L/ GL	n/a	n/a
EQIA																									
Short Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+	n/a	n/a	n/a	n/a	
Medium Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	+	+	n/a	n/a	n/a	n/a	
Long Term	n/a	n/a	n/a	n/a	n/a	+/?	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a	+	++	+	n/a	n/a	n/a	n/a	
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D/I		n/a	D	D	I	n/a	n/a	n/a	n/a	
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P		n/a	T/P	T/P	T/P	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL		n/a	L/ GL	L/ GL	L/ GL	n/a	n/a	n/a	n/a	
HIA																									
Short Term	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Medium Term	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Long Term	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	+		+	n/a	+/?		n/a
Direct / Indirect	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	D		I	n/a	I		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	T/P		T/P	n/a	T/P		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a					n/a	n/a				n/a	n/a		n/a	L/ GL		L/ GL	n/a	L/ GL		n/a
CSIA																									
Short Term				n/a						n/a															
Medium Term				n/a						n/a															
Long Term				n/a						n/a															
Direct / Indirect				n/a						n/a															
Temporary / Permanent				n/a						n/a															
Local / Greater London / Wider Region / Global				n/a						n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
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- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
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- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.48 SI14 Waterways- strategic role

Policy description

The policy supports the coordination and alignment at the interfaces between terrestrial and marine planning. It also seeks to reflect the distinctiveness of different areas of the River Thames and encourage boroughs to work together to create development proposals and policies which support the Thames Strategies as well as individual water management plans.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would promote the use of the waterways for a range of community, cultural and recreational purposes. These types of activities can contribute significantly to the health and wellbeing of residents. Recreational and cultural activities, and good quality green and blue spaces, can provide many physical and mental health and wellbeing benefits, including spaces for exercise and mindfulness, and increased social integration. The policy also recognises the strategic cultural and heritage role of the Thames and other waterways.

The policy highlights that the River Thames should not be designated as Metropolitan Open Land (MOL). This would ensure that it could continue to be utilised for transport activities. This could help to reduce volume of road vehicles by maximising river-based vehicles which can transport much larger volumes. This would therefore have associated improvements in local air quality, noise generation and carbon emissions by.

Implementation of this policy would help to address the current deficiencies in water-based passenger transport in the city. The promotion of water-based transport would help to reduce congestion on London roads and increase connectivity across the City particularly for communities who currently struggle to access employment opportunities and key services due to a lack of transport options. Water-based transport can also be a key tourist attraction and provide a way to access London's historical and cultural assets and strategic views.

Cumulative

Implementation of the policy could complement policies that support sustainable transportation and freight movement, particularly SI17 Protecting London's waterways and T7 Freight. The combination of policies could promote increased water quality across London's waterway by using sustainable water transport.

Recommendations

It was recommended further information was included on how new river transport links would tie into existing transport hubs and how they could be used to promote active transport. Particular reference could be made to the affordability of improved river transport options, this will assist lower income communities in using such services to access cultural opportunities. It was also recommended that more specific reference should be made to inclusive access.

The joint Thames Strategies could also consider existing water quality in different areas to reduce the risk of further pollution.

GLA response

The GLA amended the supporting text include additional references to inclusive access, however advised that other policies in the Plan addressed this. The GLA also included a reference to water quality under joint Thames Strategies.

The GLA advised that connecting major hubs with the river transport to encourage use of the river and facilitate active transport was addressed in the Mayor's Transport Strategy.

In relation to the affordability of transport options, the GLA advised that the river service is complementary to other option on the public transport network, the cost of running is high and already requires significant subsidy.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy for London's European sites, in that encouraging use of London's waterways may reduce recreational visits to areas such as Epping Forest (such as through the Walthamstow Wetlands project due to open in 2017) and also may reduce vehicle movements on London's road network. Use of waterbodies such as reservoirs for (for example) recreation would still need to comply with the requirements of the Habitats Directive where those waterbodies are internationally important. This is a matter of law and does not need to be stated in this policy since the policy does not specifically identify particular waterbodies. The fact that recreational use and designated waterbodies are not incompatible is demonstrated by the Walthamstow Wetlands project which incorporates several internationally important waterbodies.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional text was added as policy BA, setting out that Development Plans and development proposals should seek to maximise the multifunctional benefits waterways provide.

Amendments were also made to Paragraph 9.14.2 of the supporting policy text. The addition of urban cooling was identified as a function of waterways within London. Furthermore, the additional text acknowledges the residential function of waterways in providing a home for Londoners living on boats, and contributing to wider placemaking of neighbourhoods. This additional text strengthens the policy narrative surrounding the value of waterways, and their potential to provide positive outcomes across health, recreational and environmental objectives. These policy amendments have resulted in revisions to the scoring matrix below.

Table 49: SI14 Waterways- strategic role

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		+	+	n/a	n/a	?	O	O	O	n/a	+/?	?/+	+	?/+	n/a	n/a	n/a
Medium Term						n/a	+		+	+	n/a	n/a	?	O	O	O	n/a	+/?	?/+	+	?/+	n/a	n/a	n/a
Long Term						n/a	+		+	+	n/a	n/a	?	O	+/?	O	n/a	+/?	?/+	+	?/+	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	D	n/a	n/a	D	D	D	D	n/a	D	D	I	D	n/a	n/a	n/a
Temporary / Permanent						n/a	T/P		P	P	n/a	n/a	P	P	P	P	n/a	T/P	T/P	T/P	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/GL		L/GL	L	n/a	n/a	L/GL	L/GL /W	L/GL /W	L/GL /W	n/a	L/GL	L/GL	L/GL	L/GL	n/a	n/a	n/a
EQIA																								
Short Term	?	?	?	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	?	?		n/a	?	?	?	?	n/a	n/a	?
Medium Term	O	?	+	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	+	?		n/a	?	?	?	?	n/a	n/a	+
Long Term	+	?	+	n/a	+/?	n/a	+	?	+	+	n/a	n/a	?	+	+		n/a	?	?	?	?	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	n/a	I/D	n/a	I/D	I/D	D	D	n/a	n/a	D	D	I/D		n/a	I/D	I/D	I/D	I/D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	P	P	n/a	n/a	P	P	T/P		n/a	T/P	T/P	T/P	P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL	L/GL	n/a	L/GL	n/a	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL	L/GL /W	L/GL /W		n/a	L/GL	L/GL	L/GL	L/GL	n/a	n/a	L/GL
HIA																								
Short Term	O	O	O		+/?				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Medium Term	O	O	O		+/?				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Long Term	+/?	+/?	+/?		+/?				+	n/a				O	O		n/a	?		n/a	n/a	?		n/a
Direct / Indirect	I	I	I		I/D				D	n/a				D	D		n/a	D		n/a	n/a	D		n/a
Temporary / Permanent	T/P	T/P	T/P		T/P				P	n/a				P	P		n/a	T/P		n/a	n/a	P		n/a
Local / Greater London / Wider Region / Global	L	L	L		L/GL				L/GL	n/a				L/GL /W	L/GL /W		n/a	L/GL		n/a	n/a	L/GL		n/a
CSIA																								
Short Term				n/a																				
Medium Term				n/a																				
Long Term				n/a																				
Direct / Indirect				n/a						I														
Temporary / Permanent				n/a						T/P														
Local / Greater London / Wider Region / Global				n/a						L														

Objectives

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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4. To contribute to safety and security and the perceptions of safety
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14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
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16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.49 SI16 Water use and enjoyment

Policy description

This policy supports the utilisation and enjoyment of the waterways by providing water-sport centres, water infrastructure, new moorings and associated facilities as well as promoting the use of the waterways for cultural, educational and community facilities. It will also seek to protect existing access points to the waterways, as well as promoting improvements to, and the expansion of, the Thames Path and towpaths.

Initial appraisal and recommendations

Social, economic and environmental effects

The implementation of this policy would promote the use of the waterways for a range of community, cultural, educational and recreational opportunities which could contribute to social inclusion and participation in opportunities London offers. Utilisation of the waterways for a range of recreational opportunities including rowing, sailing and canoeing, alongside the use of the Thames Path, would facilitate an increase in more active, healthier lives.

The promotion of water-based transport would help to reduce congestion on London roads, promote tourism and increase connectivity. This would help to drive London's economy, particularly its important tourism industry, by improving access to cultural and historic assets and to the important strategic views that sit along the River Thames.

The intensive use of waterways could compromise the quality of the water and the surrounding natural environment by introducing pollution from increased transport activity, development on the waterways and litter from increased use and have a detrimental impact upon the habitats of local importance and species within and alongside the water. Depending on the type of use, this policy could impact ambient noise conditions and increase disturbance to local residents.

Cumulative

This policy could conflict with policies G4 Local green and open space and D7 Public realm which seek to preserve the environmental quality of London's water bodies and associated habitats. However, the implementation of the policy would complement the policy S5 Sports and recreation which promotes more active lives and enjoyment of London's spaces.

Recommendations

It was recommended that where the provision of new sports infrastructure is concerned, the policy could provide further detail on how this provision will be spatially allocated, for example will areas of deprivation or existing deficit be prioritised. It was also recommended that further reference could be made to supporting infrastructure, such as lighting, electricity supply and broadband to underpin economic vitality along canal and waterways.

Further reference could also be made to the affordability of moorings, and how these will be allocated across relevant communities/ applicants.

Further reference could also be made to how conflicts in land and water use can be managed, to allow economic and cultural vitality without causing adverse impacts to local residents and services. This could include noise restrictions on certain night-time activities, appropriate design and spatial management of uses, and consultation with groups at risk.

It was also recommended that examples are given on the types of educational, cultural and sporting events which the river could be used for and any barriers to accessing these events which could occur for local residents.

GLA response

The GLA advised that the appropriateness and location of infrastructure to support sports facilities on the river would be determined locally by boroughs. In relation to other supporting infrastructure, the GLA advised that this applies to all transport connections and these issues are addressed in other policies elsewhere in the Plan.

In terms of the affordability of mooring, the GLA advised that that by increasing the supply of mooring would facilitate with affordability issues however, the more specific detail would be addressed through the emerging Canal & River Trust's Mooring Strategy.

The GLA clarified that other policies in the London Plan allow the balancing act of promoting economic and cultural vitality without causing adverse impacts to local residents and services; specifically SI17 assist with this. The GLA also advised that the appropriateness of educational, cultural and sporting events would depend on local circumstances.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. This is a positive policy for London's European sites, in that encouraging use of London's waterways may reduce recreational visits to areas such as Epping Forest (such as through the Walthamstow Wetlands project due to open in 2017) and also may reduce vehicle movements on London's road network.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional text was provided to part D of the policy, setting out that development proposals adjacent to waterways should protect and enhance existing moorings where possible, along with supporting and promoting new moorings and required facilities. This amendment clarifies that development proposals should enhance existing infrastructure as well as promote new facilities, encouraging an equitable and inclusive approach to provision.

Additional wording was also added to part F of the policy, requiring development proposals along waterways to protect and enhance inclusive public access to and along the waterway front. This

amendment strengthens the narrative surrounding inclusive access, and more explicitly integrates parts of Policy T3 in relation to improving the Thames Path. These policy amendments have resulted in revisions to the scoring matrix below.

Table 50: SI16 Waterways- use and enjoyment

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?	-	+	n/a	n/a	?
Medium Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?	-	+	n/a	n/a	?
Long Term						n/a	n/a		+	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	?	-	+	n/a	n/a	?
Direct / Indirect						n/a	n/a		D	D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	D	I/D	D	n/a	n/a	D
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		L/ GL	L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L	n/a	n/a	L/ GL
EQIA																								
Short Term	+	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	n/a	n/a	n/a		n/a	?	n/a	-	+	n/a	n/a	?
Medium Term	+	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	+	n/a	n/a	n/a		n/a	?	n/a	-	+	n/a	n/a	?
Long Term	+	+	+	n/a	n/a	n/a	n/a	++	+	+	n/a	+	n/a	n/a	n/a		n/a	?	n/a	-	+	n/a	n/a	?
Direct / Indirect	I	I	I	n/a	n/a	n/a	n/a	I/D	I/D	I/D	n/a	D	n/a	n/a	n/a		n/a	I/D	n/a	I/D	D	n/a	n/a	D
Temporary / Permanent	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a		n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L	n/a	n/a	n/a	n/a	L/ GL	L/ GL	L/ GL	n/a	L	n/a	n/a	n/a		n/a	L/ GL	n/a	L/ GL	L	n/a	n/a	L/ GL
HIA																								
Short Term	+	+	+		n/a				n/a	n/a								n/a	?		+	+	?	?
Medium Term	+	+	+		n/a				n/a	n/a								n/a	?		+	+	?	?
Long Term	+	+	++		n/a				n/a	n/a								n/a	?		+	+	?	?
Direct / Indirect	I	I	I		n/a				n/a	n/a								n/a	D		I	D	D	D
Temporary / Permanent	T/P	T/P	T/P		n/a				n/a	n/a								n/a	T/P		T/P	T/P	T/P	T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				n/a	n/a								n/a	L/ GL		L	L	L/ GL	L/ GL
CSIA																								
Short Term				n/a					+															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					D															
Temporary / Permanent				n/a					T/P															
Local / Greater London / Wider Region / Global				n/a					L/ GL															

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16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
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21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.50 SI17 Protecting London's waterways

Policy description

The policy seeks to ensure that all future developments facilitate river restoration and protection and maintain the open character and heritage of the waterways. It also supports the preservation of the local character and environment of London's canal network, docks, rivers and other water spaces whilst ensuring they remain accessible and usable to residents and visitors.

Initial appraisal and recommendations

Social, economic and environmental effects

The River Thames is an iconic part of London and this policy ensures any new development respects the local environment and allows the waterway to remain dynamic and modern. The positive regeneration of waterway areas, and the provision of public realm, residential, office, bars and restaurant uses, will continue to drive London's economy, ensuring it remains an attractive place for tourists and businesses alike. This policy also ensures waterways are accessible to users and promotes water-related uses. This would improve access to active and fulfilling activities, such as water-based sports, which can provide both mental and physical health benefits.

The support for river restoration and naturalisation to encourage the development of natural local habitats would ensure the biodiversity of waterways are protected and enhanced. Protection from the pollution caused by moored vessels, and the potential impacts of increased development on land (e.g. increased litter) would be managed appropriately to ensure the biodiversity of the river is protected alongside continued development and recreational use. The policy does not prohibit the use of the river for transport and recreation, but ensures appropriate measures are in place to protect it. In addition, the policy promotes the adoption of on-shore power at water transport facilities, which would contribute to reduced emissions and improvements in air quality for local residents.

Cumulative

The implementation of the policy would complement those policies that support the development of London's waterways namely, SI15 Water transport and SI16 Waterways – use and enjoyment. These policies promote the use and development of the river and should be in place in conjunction with this policy. In addition, this policy supports the restoration of naturalisation which supports and aligns with the policy G6 Biodiversity and access to nature.

Recommendations

It was recommended that reference is made in the policy to the affordability of local energy generation, particularly for those communities living on the waterways in houseboats who have limited access to alternative energy options.

It was recommended that further details are given on ensuring a balance between encouraging the development of the waterways and protecting against the potential impacts of development (noise, waste generation, pollution, environmental damage). It was also recommended that further reference

on how air quality be monitored and mitigated could be incorporated as part of this policy. This would further help to protect more vulnerable groups from adverse air quality impacts.

GLA response

The policy was amended to improve readability. The GLA advised that it is more appropriate for borough local plans to address issues of local energy generation. The GLA also advised that the Plan needs to be read as a whole and that different interests need to be balanced according to local circumstances. Other issues such as air quality, noise and waste were dealt with elsewhere in the Plan.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. There are no impact pathways present.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording and supporting text. An additional policy AA was added, setting out that Development Plans should support river restoration and biodiversity improvements. This strengthens the policy narrative surrounding enhancing natural capital across London, and could result in beneficial outcomes across a range of environmental, recreational and health objectives.

Additional wording was also added to Part B of the policy to provide clarity around the benefits of river restoration and biodiversity improvements, including improving floodplain, riparian and adjacent terrestrial habitats and water quality. This amendment acknowledges the broad range of benefits associated with protecting and enhancing London's waterways. This links to the wording amendments added to part D of the policy, which highlights the importance of biodiversity and water spaces as social and economic assets. This explicit recognition of the multiple values of waterways beyond environmental impacts helps to strengthen the policy narrative around the role of natural capital in supporting recreational, transport and community agendas.

Further text was also added to Paragraph 9.17.2 of the supporting policy text, setting out that waterways should not be used as an extension of developable land in London, and nor should parts be formed of continuous line of moored craft. Although this will have beneficial outcomes for the environment and the protection of water bodies, it could have adverse impacts on the overall availability and quantum of housing for London. This is both in terms of new build residential development, and the potential for fewer houseboats as a result of the mooring restrictions. These policy amendments have resulted in revisions to the scoring matrix below.

Table 51: SI17 Protecting London’s waterways

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	+	+/?	+	+	n/a	n/a	n/a
Medium Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	+	+/?	+	+	n/a	n/a	n/a
Long Term						n/a	+		+	O	n/a	n/a	n/a	+	+	+	+	+	+/?	+	+	n/a	n/a	n/a
Direct / Indirect						n/a	D		D	I	n/a	n/a	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a
Temporary / Permanent						n/a	P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						n/a	L/ GL		L/ GL	L	n/a	n/a	n/a	L	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a
Short Term	n/a	n/a	n/a	?	?/-	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	+/?	+	n/a	n/a	n/a
Medium Term	n/a	n/a	n/a	?	?/-	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	+/?	+	n/a	n/a	n/a
Long Term	n/a	n/a	n/a	?	?/-	+	?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O		+/?	+/?	n/a	+/?	+	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	n/a	I	n/a	I	I	n/a	n/a	I/D	n/a	n/a	n/a	D	I/D		D	D	n/a	I/D	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	T/P	n/a	T/P	T/P	n/a	n/a	T/P	n/a	n/a	n/a	T/P	T/P		T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	L	n/a	L	L	n/a	n/a	L/ GL	n/a	n/a	n/a	L	L		L	L	n/a	L	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	+/?		n/a				n/a	n/a				+	O		n/a	+/?		+/?	n/a	n/a		n/a
Medium Term	n/a	n/a	+/?		n/a				n/a	n/a				+	O		n/a	+/?		+/?	n/a	n/a		n/a
Long Term	n/a	n/a	+/?		n/a				n/a	n/a				+	O		n/a	+/?		+/?	n/a	n/a		n/a
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				D	D		n/a	D		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				T/P	P		n/a	T/P		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L	L/ GL /W		n/a	L		n/a	n/a	n/a		n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

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- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London’s water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London’s geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.51 T3 Transport capacity, connectivity and safeguarding

Policy description

This policy addresses capacity and connectivity concerns both currently and in the future. Developments should support the sustainable development of London, national and international public transport connections. This is enabled by the provision and safeguarding of sufficient land to allow for expanded public and active transport systems. Particular emphasis is put on delivering Underground line upgrades, securing Crossrail 2 and the Bakerloo Line Extension, and supporting increased capacity and efficiency on the bus network.

Initial appraisal and recommendations

Social, economic and environmental effects

Implementation of this policy would indirectly benefit public transport accessibility by providing affordable and sustainable travel options. This would help mitigate severance and isolation through improved access to opportunities and services. This could have a number of regenerative impacts on deprived areas, including improving access to employment opportunities to reduce socio-economic inequalities. The safeguarding of future public transport assets can also indirectly facilitate the delivery of a safer and more secure transport network, whilst promoting efficient and sustainable public transport.

The policy encourages the efficient use of land that is already well-connected. Improvements to the current public transport network supports the use of these sites for development, which could allow for increased housing delivery and indirectly benefit access to services and facilities. This is further supported by the emphasis on Crossrail 2 and the Bakerloo Line Extension which aim to connect more areas to central London. Improvements to the connectivity of transport infrastructure is a crucial factor in catering for London's growth and maintaining its economic competitiveness.

Increased capacity and reliability on sustainable transport networks would also alleviate crowding on public and active transport routes. This would help to improve London's productivity by decreasing journey times, improving Londoners' quality of life, and allowing more people to have greater access to opportunities and services across the city and wider region. Increasing the use of sustainable transport would also lead to fewer journeys taken by private vehicle, reducing air and noise pollution and associated carbon emissions.

The safeguarding of the Walk London Network would promote active transport which offers a number of health and wellbeing benefits due to increased levels of exercise and access to higher quality walking paths. Increased capacity and connectivity of active transport networks could also involve landscaping which would benefit London's natural capital and townscape, and help to alleviate issues such as the urban heat island effect.

Cumulative

This policy supports policies SI1 Improving air quality, T2 Healthy streets, D13 Noise and SD10 Strategic and local regeneration which aim to reduce private vehicle use and increase the use of active and public transport, which benefits London's air quality, decrease noise disturbances and promote

healthy lifestyles. The policy also supports the economic regeneration of areas by providing accessible and affordable connectivity across London.

Recommendations

It was recommended that the policy was more specific in its promotion of active transport and inclusive design to benefit the health and wellbeing of Londoners and increase equality in terms of access and provision of infrastructure throughout London. Additionally, it could directly refer to safety and security on public transport as well as the resilience of the public transport network to major incidents.

GLA response

The GLA advised that other policies in the Plan addressed the recommendations such as active travel in T2 Healthy Streets, D7 Public Realm and T4 Assessing and mitigating transport impacts. The GLA further advised that safety and security on public transport and the resilience of the public transport network to major incidents was addressed in the Mayor's Transport Strategy.

Appraisal of finalised policy

Some detail was removed along with minor editorial amendments, however the direction of the policy remains the same. The detail removed relates to specific transport attributes to be targeted, as well as reference to intensification and the environmental performance of the public transport system.

Removal of the specific mention of environmental performance of the transport system has changed some of the previously positive effects to no change. However, the addition of the safeguarding the Walk London Network and the emphasis on the bus network has benefits for both health and the environment.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Improving public transport capacity and connectivity will be positive for protecting European sites sensitive to air quality, notably Epping Forest SAC. None of the specific schemes identified by the Mayor as a particular priority would have a likely significant effect on any European sites.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy text. An additional paragraph has been added to highlight the role improved efficiency of the transport network can play in unlocking growth potential. The additional text supports eliminating physical barriers to movement, particularly in places where the Thames divides communities, through improved public transport capacity and enhanced active travel opportunities.

This is likely to overcome community severance associated with the River Thames, and support improved access to key services and employment opportunities for surrounding communities. This will support a range of beneficial outcomes relating to health, education and social cohesion, and could facilitate new housing development across London. These policy amendments have resulted in revisions to the scoring matrix below.

Table 52: T3 Transport capacity, connectivity and safeguarding

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	?		+	+	+	n/a	n/a	O	O	O	O	n/a	n/a	?	n/a	n/a	n/a	O
Medium Term						+	?		+	+	+	n/a	n/a	O	O	+	O	n/a	n/a	?	n/a	n/a	n/a	+
Long Term						+	?		+	+	+	n/a	n/a	+	+	+	+	n/a	n/a	?	n/a	n/a	n/a	+
Direct / Indirect						I	I/D		I/D	I/D	I	n/a	n/a	I	I	I	I/D	n/a	n/a	I/D	n/a	n/a	n/a	I
Temporary / Permanent						T/P	T/P		T/P	T/P	T/P	n/a	n/a	T/P	T/P	P	T/P	n/a	n/a	P	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	L/ GL		L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	L/GL /W	L/GL	L/GL	n/a	n/a	L/GL /W	n/a	n/a	n/a	L/ GL
EQIA																								
Short Term	+/?	+/?	O	O	O	O	n/a	+	+	+	+	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Medium Term	+/?	+/?	+	+	+/?	+	n/a	+	+	+	+	n/a	n/a	O	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Long Term	+/?	+/?	+	+	+/?	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	?	n/a	n/a	?
Direct / Indirect	I	I	I	I	n/a	I	n/a	I	I	I	I	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	I
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	T/P	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL /W	L/GL /W	L/ GL	L/ GL	n/a	L/GL /W	n/a	L/ GL	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	L/GL /W	n/a		n/a	n/a	n/a	n/a	L/ GL	n/a	n/a	L/ GL
HIA																								
Short Term	+	+	+		O				O	n/a				O	O		n/a	n/a		?	n/a	n/a		O/-
Medium Term	+	+	+		+/?				+	n/a				O	O		n/a	n/a		?	n/a	n/a		O/-
Long Term	+	+	+		+/?				++	n/a				+	+		n/a	n/a		?	n/a	n/a		O/-
Direct / Indirect	I	I	I		n/a				D	n/a				I	I		n/a	n/a		I/D	n/a	n/a		I
Temporary / Permanent	T/P	T/P	T/P		n/a				P	n/a				T/P	T/P		n/a	n/a		P	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L/ GL		n/a				L/GL /W	n/a				L/GL /W	L/GL /W		n/a	n/a		L/GL /W	n/a	n/a		L/ GL
CSIA																								
Short Term				n/a					O															
Medium Term				n/a					+															
Long Term				n/a					+															
Direct / Indirect				n/a					I/D															
Temporary / Permanent				n/a					T/ P															
Local / Greater London / Wider Region / Global				n/a					L/ GL															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.52 T5 Cycle parking

Policy description

This policy aims to facilitate an increase in cycling activity and remove barriers to cycling through the delivery of cycle routes and provision of cycle parking. The policy sets out the minimum cycle parking standards for development projects, categorised by land use.

Initial appraisal and recommendations

Social, economic and environmental effects

This policy promotes the role of development plans and development proposals in facilitating an increase in cycling and removing barriers to cycling. It encourages the consideration of appropriate alternative locations for cycle parking in instances where adequate and suitable provision may not be possible within residential developments, and (on-street) off the public highway for visitors.

The implementation of this policy would encourage more active lifestyles, and go some way towards reducing health inequalities across the city. This would provide mental and physical health and wellbeing benefits due to the close associations between exercise and good health. By ensuring the delivery of cycle routes and improvements in infrastructure, implementation of the policy would also promote inclusion and integration in communities, and also enhance the character of the city. It could improve wider accessibility and connectivity by increasing access to the opportunities, services and facilities London provides through sustainable, affordable transport.

The creation of cycle routes and cycle parking would need to be supported by a number of security features, such as lighting, high quality legibility and surveillance, where appropriate. This could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

Through the promotion of cycling and a move away from motorised, private transport, implementation of the policy would support the reduction of emissions and concentrations of harmful atmospheric pollutants. This would support improvements to air quality and climate change affects, and would also contribute to minimising ambient noise and vibration from traffic.

Cumulative

This policy complements policies T2 Healthy streets, T1 Strategic approach to transport, SI1 Improving air quality and G4 Local green and open space which support the delivery of increased active travel and transport infrastructure to improve air quality and increase health and wellbeing to transport users, such as commuters.

Recommendations

This policy does not reference the safety of the cycle parking in any detail, which could stop some people from walking/cycling if they feel facilities are not secure or they feel at risk using them. In addition, the policy could further reference inclusive access, and quality in relation to active transport opportunities.

GLA Response

The policy was amended to include a reference to safety and inclusivity in relation to cycling parking. The GLA advised that this policy alongside policy T1 and T2 supported active travel opportunities.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as an increase in cycle parking provision may encourage the use of active travel.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. Additional policy AA was added, requiring development proposals to demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people. This has strengthened the policy narrative surrounding inclusive access, and is likely to support improved access to employment opportunities and key services for less mobile residents. As a result of improved connectivity and economic opportunities, this could also facilitate social cohesion across communities in London. This policy amendment has resulted in revisions to the scoring matrix below.

Table 53: T5 Cycle parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						O	O		O	n/a	+	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	n/a	+	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I	I/D		I/D	n/a	I/D	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	L/GL	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
EQIA																								
Short Term	O	O	O	?	n/a	O	O	+	?	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term	+	+	+	O	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	+	+	+	+	n/a	+	+	++	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
HIA																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Medium Term	+	+	+		n/a				?/+	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Long Term	+	+	+		n/a				+	n/a				+	+		n/a	n/a		n/a	n/a	n/a	+	
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	I/D	
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	T/P	
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	L/GL	
CSIA																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/GL															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.53 T6 Car parking

Policy description

This policy facilitates the restriction of car parking through the promotion of car-free development proposals, especially in areas well connected by public transport. It also supports application of the maximum parking standards and provision of disabled persons parking and electric vehicle charging infrastructure set out in Policies T6.1- T6.5.

The policy requires the submission of a Car Park Design and Management Plan alongside all applications which include car parking provision.

Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This initial draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

Car Parking (T6)

Residential Parking (T6.1)

Office Parking (T6.2)

Retail Parking (T6.3)

Hotel and leisure uses parking (T6.4)

Non-residential disabled persons parking (T6.5)

Appraisal of finalised policy

Social, economic and environmental effects

The implantation of this policy would ensure the restriction of car parking, encouraging the use of more sustainable transport patterns such as walking and cycling. This could lead to more active lifestyles, and go some way towards reducing health inequalities across the city. The protection and delivery of disabled persons parking (Blue Badge Holders) would ensure London remains inclusive and integrated.

The policy supports car-free development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided, this could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

Although the policy restricts car parking, it would improve accessibility, connectivity and sustainability in London as it reduces the demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages more active and sustainable transport methods.

Through the promotion of car-free development and sustainable modes of transport, including electric vehicles, implementation of the policy would have positive effects on objectives that aim to reduce emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and contribute positively to climate change adaptation. This policy would also help to minimise noise and vibration levels and disruption as car-free developments and a reduction in cars would contribute to a decrease in noise levels.

Cumulative

This policy complements policies S11 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

GLA response

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a reduction in parking provision may discourage the use of private cars.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional text has been to Paragraph 10.6.8 of the supporting text, setting out that where electric vehicle charging points are provided on-street, physical infrastructure should ideally be located off the footpath. Where charging points are located on the footpath, it must remain accessible to all those using it including disabled people. This strengthens the overall policy narrative surrounding inclusive access by ensuring pavements are and footpaths remain accessible for all groups within London.

A new paragraph has also been added to the supporting text, setting out that surface-level car parking should be permeable where possible, in accordance with Policy S113 Sustainable drainage. This strengthens the policy narrative surrounding managing flood risk, and improving the resilience of the built environment. These policy amendments have resulted in revisions to the scoring matrix below

Table 54: T6 Car parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						?/+	O		O	n/a	n/a	n/a	n/a	O	O	O	O	n/a	O	n/a	n/a	n/a	n/a	+
Medium Term						?/+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	+/?	n/a	n/a	n/a	n/a	+
Long Term						?/+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	+	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	I	I/D	I	I	n/a	I	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	T/P	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L	L/GL	L	n/a	L	n/a	n/a	n/a	n/a	L/GL
EQIA																								
Short Term	O	O	O	O	n/a	O	O	O	O	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term	+	+	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term	++	+	+	+	n/a	+	+	++	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	n/a	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
HIA																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		O
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		O
Long Term	+	+	+		n/a				?	n/a				++	+		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a		L/GL
CSIA																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/GL															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.54 T6.1 Residential parking

Policy description

This policy facilitates the restriction of residential car parking through the promotion of car-free development proposals in inner London and large scale shared living residential areas such as student accommodation. It provides maximum residential car parking standards that should be applied to all new residential development based on their location within London.

This policy supports the provision of infrastructure for electric or Ultra Low Emission vehicles, disabled persons parking and consideration of parking spaces for infrequent trips e.g. car club spaces.

Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

Car Parking (T6)

Residential Parking (T6.1)

Office Parking (T6.2)

Retail Parking (T6.3)

Hotel and leisure uses parking (T6.4)

Non-residential disabled persons parking (T6.5)

Appraisal of finalised policy

Social, economic and environmental effects

This policy promotes the restriction of residential car parking in inner London and large developments, which could encourage the use of more sustainable transport patterns such as walking and cycling in these areas. This could promote active lifestyles, and go some way towards reducing health inequalities across the city, also providing mental and physical benefits. The protection and delivery of disabled persons parking (Blue Badge Holders) would ensure London remains inclusive and integrated. Local regeneration alongside these car-free developments would also positively contribute to enhancements in the character and townscape of the city.

This policy partly supports car-free development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and

surveillance where appropriate. If these features were provided this could help to create better quality open space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

This policy would improve accessibility, connectivity and sustainability as it promotes the partial restriction and management of residential car parking in order to reduce demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages healthier, active forms of transport over the use of private vehicles.

Through the promotion of car-free residential development and sustainable modes of transport, including electric vehicles and Ultra Low Emission vehicles, implementation of the policy would contribute to reduction in emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand.

This policy would help to minimise noise and vibration levels and disruption as car-free developments and use of electric vehicles would contribute to a reduction in noise levels. However, by limiting residential car parking, the policy may negatively affect the sale of new homes if individual's desire parking alongside their homes, however as this policy only applies to new build properties, there would still be a choice of homes in the existing housing stock.

Cumulative

This policy complements policies SI1 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use. This policy could conflict with policy H16 Accessible housing which supports housing which connects with existing infrastructure and amenities. The restriction of residential car parking may reduce connectivity and reduce accessibility.

Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use

GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of residential car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Post-consultation amendments

Following consultation, a number of amendments have been made to the supporting policy wording. Additional text has been added as Paragraph 10.6.12A of the supporting text, setting out that parking

spaces should be leased rather than sold to ensure the land they take up is used as efficiently as possible over the life of a development. This includes enabling disabled persons parking bays to be used by those who need them at any given time and ensuring enlarged bays are available to be converted to disabled persons parking bays as required. Leases should be short enough to allow for sufficient flexibility in parking allocation to reflect changing circumstances. This additional text was added to clarify the rationale behind parking spaces being leased rather than sold.

This strengthens the policy narrative surrounding inclusive access, by ensuring sufficient parking provision for disabled users, and supports the sustainable and efficient use of land.

An additional paragraph has also been added after Paragraph 10.6.12A, setting out that car clubs count towards the maximum parking permitted, because they share many of the negative impacts of private cars. In areas where car dependency is high, car club spaces can help support lower parking provision by enabling multiple households to make infrequent trips by car. Although car sharing is not considered a sustainable mode of transport, the provision of appropriate infrastructure can help to reduce private vehicle use, along with associated emissions and congestion. This could result in a range of environmental and health benefits for communities in areas of high car dependency.

These policy amendments have resulted in revisions to the scoring matrix below.

Table 55: T6.1 Residential parking

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
SEA																									
Short Term						+	O		O	n/a	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	n/a	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	n/a	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	n/a	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	L	L	L/GL	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
EQIA																									
Short Term	O	O	O	?	-/?	O	O	O	?	n/a	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	-/?	+	+	+	+	n/a	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	++	++	+	+	-/?	++	+	+	+	n/a	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	I	I/D	I/D	I/D	I/D	n/a	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	L	L/GL/W	L	L	L	L/GL	n/a	n/a	n/a	n/a	L/GL	L/GL		L/GL	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L/GL
HIA																									
Short Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+		-/?				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	D	D	D		I				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	P	P	P		T/P				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	L	L		L/GL/W				L	n/a				L/GL	L/GL		n/a	n/a		n/a	n/a	n/a	n/a	n/a	L/GL
CSIA																									
Short Term				O					?																
Medium Term				+					?																
Long Term				+					?																
Direct / Indirect				I/D					I/D																
Temporary / Permanent				T/P					T/P																
Local / Greater London / Wider Region / Global				L					L/GL																

Objectives

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- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.55 T6.3 Retail parking

Policy description

This policy aims to facilitate the restriction of retail car parking through promotion of car-free retail development proposals in the Central Activities Zone and areas within Public Transport Access Levels (PTAL) of 5 or 6. The policy supports the use of existing public provision and existing parking, such as town centre parking or office parking outside of working areas. It also provides maximum retail car parking standards that should be applied to all new retail development based on their location within London.

Initial appraisal and recommendations

The draft policy T6 Parking was a single policy that supported the restriction of car parking and aimed to increase accessibility and connectivity and reduce congestion caused by car travel. It also aimed to encourage the use of other modes of transport (public transport, walking and cycling). This draft policy did make reference to standards relating to cycle, residential, commercial, employment and retail parking but to increase clarity, the policy was separated.

The draft policy has now been divided into separate policies covering:

Car Parking (T6)

Residential Parking (T6.1)

Office Parking (T6.2)

Retail Parking (T6.3)

Hotel and leisure uses parking (T6.4)

Non-residential disabled persons parking (T6.5)

Appraisal of finalised policy

Social, economic and environmental effects

This policy promotes the restriction of retail car parking in inner London and the use of public transport. This would encourage the use of more sustainable transport patterns such as walking and cycling in these areas and therefore go some way towards reducing health inequalities across the city, also providing mental and physical benefits. The combination of car-free retail developments and local regeneration would therefore also positively contribute to enhancements in the character and townscape of the city.

This policy partly supports car-free retail development, encouraging a modal shift to sustainable transport forms. Private vehicles can offer a greater sense of security, particularly for older people, residents with a disability, unaccompanied females and children. The shift towards active transport would therefore need to be supported by a number of security features, such as lighting, high quality legibility and surveillance where appropriate. If these features were provided this could help to create

better quality space which, through improved appearance, are less likely to attract anti-social behaviour and criminal activity.

The policy would improve accessibility, connectivity and sustainability as it promotes the partial restriction and management of retail car parking in order to reduce demand for travelling by car and encourages a shift towards public transport, walking and cycling. It does not remove the provision of transport, but rather encourages more active and sustainable forms. This could negatively affect accessibility if disabled persons parking for Blue Badge holders is not provided.

Through the promotion of car-free retail development and sustainable modes of transport, implementation of the policy would have positive effects on objectives that aim to reduce emissions and concentrations of harmful atmospheric pollutants. This would contribute to improvements in air quality and climate change adaptation and reduce energy demand. This policy would also help to minimise noise and vibration levels and disruption as car-free developments would contribute to reduction in noise levels.

This policy may limit retail businesses' customer base by restricting parking availability and the ease at which these retail units can be accessed, potentially impacting their viability.

Cumulative

This policy complements policies SI1 Improving air quality, T2 Healthy streets, T1 Strategic approach to transport, G3 Metropolitan open land and G4 Local green and open space which support the restriction of car parking and the provision of existing space for alternative uses, such as, green space and areas for community use.

Recommendations

This policy should reference how high quality walking and cycling facilities will be provided and maintained to encourage continued use and facilitate a modal shift away from private car use.

GLA response

The GLA advised that policies T1, T2, T5 and D7 enabled the provision of walking and cycling infrastructure to support a modal shift away from car use.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. The policy has the potential to reduce atmospheric pollution contributions as a restriction of retail car parking may discourage the use of private cars and encourage the use of sustainable or active transport.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording. A new clause has been added as EA of the policy, setting out that retail car parks with 200 spaces or more should provide one rapid electric vehicle charging point for every 20 spaces. This supports the transition to less polluting forms of private transport, and could have beneficial outcomes for air quality in the longer

term. This amendments strengthens the overall narrative surrounding sustainable transport, by ensuring sufficient supporting infrastructure is provided.

This policy amendment has resulted in revisions to the scoring matrix below.

Table 56: T6.3 Retail parking

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	O		O	O/-	n/a	n/a	n/a	O	O	O	O	n/a	n/a	n/a	n/a	n/a	n/a	+
Medium Term						+	+		+	O/-	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Long Term						+	+		+	O/-	n/a	n/a	n/a	++	+	++	+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect						I/D	I/D		I/D	I	n/a	n/a	n/a	I	I/D	I	I	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent						T/P	T/P		T/P	T/P	n/a	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global						L/ GL	L/ GL		L/ GL	L/ GL /W	n/a	n/a	n/a	L	L	L/ GL	L	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
EQIA																								
Short Term	O	O	O	?	n/a	O	O	O	O	-	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	+	+	+	O	n/a	+	+	+	+/?	-	n/a	n/a	n/a	+	O		+	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	+	+	+	+	n/a	+	+	+	+	-	n/a	n/a	n/a	+	+		+	n/a	n/a	n/a	n/a	n/a	n/a	+
Direct / Indirect	I/D	I/D	I/D	I/D	n/a	I/D	I/D	I/D	I/D	I	n/a	n/a	n/a	I	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	T/P	T/P	T/P	n/a	T/P	T/P	T/P	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L/ GL	L/ GL	L	L	n/a	L	L	L	L/ GL	L/ GL /W	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
HIA																								
Short Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		O
Medium Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		O
Long Term	+	+	+		n/a				?	n/a				+	+		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	D	D	D		n/a				D	n/a				I/D	I/D		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	P	P	P		n/a				P	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	L	L	L		n/a				L	n/a				L/ GL	L/ GL		n/a	n/a		n/a	n/a	n/a		L/ GL
CSIA																								
Short Term				O					?															
Medium Term				+					?															
Long Term				+					?															
Direct / Indirect				I/D					I/D															
Temporary / Permanent				T/P					T/P															
Local / Greater London / Wider Region / Global				L					L/ GL															

Objectives

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- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
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- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.56 T7 Freight and servicing

Policy description

This policy facilitates sustainable freight movement in London through the consolidation, modal shift and promotion of deliveries at different times of day and night in order to reduce the impact on road congestion and air quality, and conflict with other uses. It also supports the Mayor and all relevant partners to improve safety and efficiency of freight and servicing across London.

Initial appraisal and recommendations

Social, economic and environmental effects

The policy supports the delivery of goods and services through more efficient and sustainable freight movement. This ensures businesses receive the goods and services they require to prosper, thus enhancing economic productivity in the long term. Freight services indirectly support a range of supply chains and business networks that underpin economic activity and employment across the capital and would therefore positively affect economic vitality. Delivery services also provide employment for workers across different skills, and this policy could therefore protect and facilitate jobs and growth in this sector.

Implementation of this policy would encourage all development to support sustainable freight, including the provision of adequate space for off-street servicing and deliveries and the consolidation of deliveries to increase efficiency. Appropriate management of freight strategies could help to reduce traffic volume on the road network, and therefore potentially result in air quality improvements.

While this policy contributes to reducing the volume of vehicles on the road at peak times, it could increase levels at other times. The management of freight should therefore take into consideration local land use to ensure movement is appropriate, for example limiting night-time movement in residential areas or designing residential units away from delivery locations.

The implementation of this policy would improve accessibility and connectivity within and around London. Freight carried by rail and by water would relieve pressure on the road network. Coupled with this, the requirement for new development to be designed and managed so that deliveries can be received outside of peak hours, could contribute to reducing traffic volumes and congestion on regularly used roads.

Cumulative

This policy could conflict with policies D13 Noise and HC6 Supporting the evening and night-time economy which aim to minimise noise and vibration levels. This policy proposed shift to night deliveries could significantly impact noise and the existing night-time economy. The implementation of the policy would however complement policies E11 Sector growth opportunities and spatial clusters, E1 Offices, S1 Developing London's social infrastructure, H1 Increasing housing supply and SD1 Opportunity areas that support construction, employment and infrastructure development.

Recommendations

It was recommended that further information is provided on how freight traffic may be managed in order to reduce noise and vibration levels. Details on noise specific targets, as well as emissions thresholds, should be considered. It was also recommended that the impact of water freight should be more explicitly.

GLA response

No changes were proposed to be made to the draft policy, although amendments were made to the supporting text to provide additional guidance. The GLA advised that other policies in Plan addressed issues such as air quality.

The GLA also advised TfL had guidance of what should be included in Construction and Logistic Plans, and that where rail and water freight facilities are available, Transport for London's freight tools should be used when developing the site's freight strategy. In addition, the Mayor's Transport Strategy addresses issues of water freight and potential impacts

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed no likely significant effects. Overall positive policy intended to maximise movement of freight by rail or water and to ensure that the air quality (and other environmental) impacts of freight growth are appropriately considered. Dependent on locations and scale, new freight logistics and transport sites could have adverse effects on features of internationally designated sites. However, this policy does not identify any specific location or extent of development.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording and supporting text. Additional wording has been provided to section A3) of the policy, to ensure consistency with Policy D13. This amendment includes the reduction of noise from freight trips within Development Proposals, and is likely to minimise noise levels and disruption to communities across London. The policy does not address noise disturbance associated with existing facilities, however this is covered by Policy D12 Agent of Change, and should reduce inequalities in exposure.

A minor amendment has been made to the policy wording stating that development proposals should facilitate sustainable freight and servicing by providing adequate space for storage. Paragraph 10.7.3 of the supporting policy text has been amended to clarify that improved on-site storage can reduce the need for deliveries during peak periods. This could further reduce adverse impacts associated with congestion, poor air quality and noise disturbance.

The policy wording has also been amended to include alternate modes for the transportation of material, such as the use of rail and water transport. This additional text strengthens the policy narrative

surrounding modal shift and could help to reduce adverse impacts on communities associated with congestion and pollution by supporting more sustainable transport options.

Additional wording has also been added to the supporting policy text to support the use of vehicles with improved levels of driver direct vision. This is likely to improve road safety, and perceptions of safety, for pedestrians, cyclists and other road users. Improved safety and amenity for pedestrians and cyclists could help to improve positive outcomes surrounding health, wellbeing and improved access. Further text has also been added to the supporting policy text stating that the construction phase of development should not affect the amenity of people walking or cycling, and that inclusive, safe access should be prioritised and maintained at all times. This policy amendment has resulted in revisions to the scoring matrix below.

Table 57: T7 Freight and servicing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						n/a	n/a		O	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	O	+/?
Medium Term						n/a	n/a		+	+	n/a	n/a	n/a	+/?	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	+/?
Long Term						n/a	n/a		+	++	n/a	n/a	n/a	+	n/a	+/?	n/a	n/a	n/a	?	n/a	n/a	+	+
Direct / Indirect						n/a	n/a		I/D	D	n/a	n/a	n/a	I/D	n/a	I/D	n/a	n/a	n/a	I/D	n/a	n/a	I/D	I/D
Temporary / Permanent						n/a	n/a		T/P	T/P	n/a	n/a	n/a	T/P	n/a	T/P	n/a	n/a	n/a	T/P	n/a	n/a	T/P	T/P
Local / Greater London / Wider Region / Global						n/a	n/a		L/ GL	GL /W	n/a	n/a	n/a	L	n/a	L	n/a	n/a	n/a	L	n/a	n/a	L/GL /W	L
EQIA																								
Short Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+/?	O	+	n/a	n/a	n/a	+/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Medium Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+	+	+	n/a	n/a	n/a	+/?	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Long Term	+/?	n/a	n/a	+/?	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	+	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	+/?
Direct / Indirect	I/D	n/a	n/a	I/D	n/a	n/a	n/a	I	I	D	n/a	n/a	n/a	I	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	I/D
Temporary / Permanent	T/P	n/a	n/a	T/P	n/a	n/a	n/a	T/P	T/P	T/P	n/a	n/a	n/a	T/P	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	L	n/a	n/a	L	n/a	n/a	n/a	L/GL /W	L/GL /W	L/GL /W	n/a	n/a	n/a	L	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	L
HIA																								
Short Term	n/a	n/a	n/a		n/a				n/a	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Medium Term	n/a	n/a	n/a		n/a				n/a	n/a				+/?	n/a		n/a	n/a		n/a	n/a	n/a		+/?
Long Term	n/a	n/a	n/a		n/a				n/a	n/a				+	n/a		n/a	n/a		n/a	n/a	n/a		+
Direct / Indirect	n/a	n/a	n/a		n/a				n/a	n/a				I	n/a		n/a	n/a		n/a	n/a	n/a		I/D
Temporary / Permanent	n/a	n/a	n/a		n/a				n/a	n/a				T/P	n/a		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	n/a		n/a				n/a	n/a				L	n/a		n/a	n/a		n/a	n/a	n/a		L
CSIA																								
Short Term				+/?					n/a															
Medium Term				+/?					n/a															
Long Term				+/?					n/a															
Direct / Indirect				I/D					n/a															
Temporary / Permanent				T/P					n/a															
Local / Greater London / Wider Region / Global				L					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.57 T8 Aviation

Policy description

This policy supports the expansion of London's airport capacity in order to support London's passenger and freight needs, recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status. However, it also emphasises that expansion must not come at the cost of environmental and health impacts on local and region wide residents. It requires the aviation industry fully meet its external and environmental costs, particularly in respect of noise, air quality and climate change.

Initial appraisal and recommendations

Social, economic and environmental effects

Airport activity and expansion underpins trade and supports economic prosperity in London and across the country. This policy supports improvements to airports and expansion where appropriate, ensuring the aviation industry continues its vital contribution to the economy, particularly in terms of freight transport and tourism. Airports are also large employers and can provide significant job opportunities in the local and wider economy. However, airport expansion can adversely affect local communities due to associated air and noise pollution and these adverse impacts can disproportionately harm more vulnerable local communities. Whilst not offering improvements to the environment, this policy does ensure that no airport expansions would result in additional harm to air quality, noise levels or biodiversity. Additionally, the support for restricting helicopter movement across the capital could help to reduce existing noise pollution.

This policy supports more sustainable use of existing airports to ensure current infrastructure is being used in the most efficient and sustainable way. This policy also supports the integration of aviation with other transport routes and promotes the use of more sustainable forms of transport. This would ensure airports remain accessible and vibrant and offer some benefits to the environment in the form of a reduction in private vehicle use.

Cumulative

This policy could conflict with policies G4 Local green and open space, G5 Urban greening, SI1 Improving air quality and D13 Noise which encourage environmental protection the promotion of community health and wellbeing and accessible and undisturbed spaces for all Londoners. The implementation of this policy would however complement policies T1 Strategic approach to transport, SD2 Collaboration in the Wider South East, E3 Affordable workspace and E11 Sector growth opportunities and spatial clusters that support connectivity, development and employment within central and outer London. The policies also align to promote London as a global economic city which is an attractive place to live and work.

Recommendations

It was recommended that the policy could further reference inclusive design as well as potential job creation of relevant supply chains and surrounding logistics, and how these jobs can be accessed. This could include further detail on inclusive employment practices, training and skill creation

It was also recommended the policy provided further detail on integrated connectivity as well as how the aviation industry will meet its external and environmental costs particularly in respect of air quality.

GLA response

No changes were made to the draft policy, although amendments were made to the supporting text to provide additional guidance and clarity. The GLA advised that other policies within the Plan address issues such as air quality and inclusive design, and that integrated connectivity will be specific to individual airports and access arrangements.

The GLA further advised that issues such as potential job creation of relevant supply chains and surrounding logistics, how these jobs can be accessed, and inclusive employment practices, training and skill creation were more appropriate for the Mayor's Economic Development Strategy as well as borough's local plans.

Appraisal of finalised policy

No further appraisal is required as no changes are proposed to the draft policy, the appraisal is as set out above.

Implications for the HRA

Outcome of HRA screening showed potential implications to designated sites. It is acknowledged that air traffic is a large contributor to atmospheric pollution and airport growth could therefore have an adverse effect. However, the policy specifically acknowledges this. This policy does not in itself provide for any location, type or quantum of aviation development.

It is recommended that some of the policy text is strengthened with regard to protecting internationally important wildlife sites. The term 'environmental costs' implies that whatever environmental damage that might result would/could be addressed, whereas for European sites the airport operator/promoter would need to prove 'no alternatives' and 'imperative reasons of overriding public interest' first. 'Acknowledging' impacts and meeting 'environmental costs' would not necessarily be compliant with the Habitats Directive. This is a main aspect for discussion for the HRA report.

Post-consultation amendments

Following consultation, a number of amendments have been made to the policy wording, including that the health impacts of aviation must be fully acknowledged. The supporting policy text states that the development of general and business aviation activity should be supported providing this would not lead to additional environmental harm or negative effects on public health. This strengthens the policy narrative surrounding improved public health and environmental outcomes, and is likely to protect surrounding communities from adverse impacts in the long run.

Policy SI1 Improving Air Quality provides further detail on how high risk groups such as those with existing health conditions, respiratory diseases, children and older people can be protected during construction and operation of development projects. Changes to the scoring matrix as a result of this additional text are set out below.

Table 58: T8 Aviation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	n/a		O	+	O	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O
Medium Term						+	n/a		+	+	+	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O
Long Term						+	n/a		+	++	++	n/a	n/a	O	O	O	O	n/a	n/a	O/-	n/a	O	n/a	O/+
Direct / Indirect						I/D	n/a		I/D	I/D	I/D	n/a	n/a	I/D	I/D	I/D	I/D	n/a	n/a	I/D	n/a	I/D	n/a	D
Temporary / Permanent						T/P	n/a		T/P	T/P	T/P	n/a	n/a	T/P	T/P	T/P	T/P	n/a	n/a	P	n/a	T/P	n/a	T/P
Local / Greater London / Wider Region / Global						L/GL /W	n/a		L/GL /W	L/ GL	L/GL /W	n/a	n/a	L/ GL	L/ GL	L/ GL	L/ GL	n/a	n/a	L/ GL	n/a	L	n/a	L/ GL
EQIA																								
Short Term	n/a	O	O	n/a	n/a	n/a	n/a	n/a	O	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Medium Term	n/a	+	O/-	n/a	n/a	n/a	n/a	n/a	+	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O
Long Term	n/a	+	O/+	n/a	n/a	n/a	n/a	n/a	+	O	n/a	n/a	n/a	O	O		O	n/a	n/a	n/a	n/a	n/a	n/a	O/+
Direct / Indirect	n/a	I/D	I/D	n/a	n/a	n/a	n/a	n/a	I/D	I/D	n/a	n/a	n/a	I/D	I/D		I/D	n/a	n/a	n/a	n/a	n/a	n/a	D
Temporary / Permanent	n/a	T/P	T/P	n/a	n/a	n/a	n/a	n/a	T/P	T/P	n/a	n/a	n/a	T/P	T/P		T/P	n/a	n/a	n/a	n/a	n/a	n/a	T/P
Local / Greater London / Wider Region / Global	n/a	L/GL /W	L/ GL	n/a	n/a	n/a	n/a	n/a	L/GL /W	L/ GL	n/a	n/a	n/a	L/ GL	L/ GL		L/ GL	n/a	n/a	n/a	n/a	n/a	n/a	L/ GL
HIA																								
Short Term	n/a	n/a	-		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O
Medium Term	n/a	n/a	O		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O
Long Term	n/a	n/a	O/+		n/a				n/a	n/a				?	O		n/a	n/a		n/a	n/a	n/a		O/+
Direct / Indirect	n/a	n/a	I/D		n/a				n/a	n/a				D	I/D		n/a	n/a		n/a	n/a	n/a		D
Temporary / Permanent	n/a	n/a	T/P		n/a				n/a	n/a				T/P	T/P		n/a	n/a		n/a	n/a	n/a		T/P
Local / Greater London / Wider Region / Global	n/a	n/a	L/ GL		n/a				n/a	n/a				L/ GL	L/ GL		n/a	n/a		n/a	n/a	n/a		L/ GL
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

4.58 DF1 Delivery of the plan and planning obligations

Policy description:

This policy supports a consistent approach to planning obligations, as part of development proposals and land acquisition. Policies in Development Plans and the London Plan are tested for viability to consider the cumulative impact of development. Viability testing should therefore only be undertaken on a site-specific basis where clear barriers to delivery are present. Individual assessments of viability have caused uncertainty in the development process, and can be used to undermine planning requirements and the delivery of appropriate infrastructure. The policy supports that if an applicant wishes to make the case for a viability assessment, it should be supported by robust evidence, and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

Initial appraisal and recommendations

Social, economic and environmental impacts

The implementation of this policy would encourage a more standardised approach to planning obligations, which would in turn provide greater certainty for stakeholders within the development process. This could include reduced risks for developers, and greater transparency and negotiating power for local authorities and communities.

The policy supports that site-specific viability should only be undertaken in instances where significant barriers to delivery exist. By encouraging a robust evidence review of the key challenges, this policy could help to address and overcome barriers to delivery, and unlock land for development. This could help to speed up the planning process, and contribute to providing much needed housing and infrastructure in the capital. Site-specific viability assessments could help to bring forward and optimise brownfield land, encouraging sustainable development patterns.

The policy supports both applicants and decision makers in considering the strategic need for affordable housing, and public transport improvements as part of the development. It also encourages consideration for the role large sites can play in delivery key infrastructure, including health, education, cultural and leisure facilities and affordable workspace. The early consideration of key infrastructure will contribute to balanced and inclusive development, ensuring residents have access to a range of services and opportunities.

Cumulative

Implementation of this policy would complement those policies that facilitate housing delivery, infrastructure provision and viability testing.

Recommendations

It was recommended that some minor wording amendments to the supporting text were made to ensure greater clarity. It was also suggested that the policy could reference the role of density in bringing forward brownfield sites, and how this could impact on viability.

GLA Response

The GLA amended the supporting text to provide greater clarity. They advised that it was implicit in the rest of the Plan that development should be focused on brownfield land however policy GG2 more explicitly set this out. They also advised that the viability study that accompanied the Plan clearly

showed that the policies within the Plan were viable and policy DF1 was explicit that viability issues should be exceptions to the rule.

Post-consultation amendments

Following consultation the appraisal was amended to consider environmental and funding-gap issues.

The policy supports a number of positive environmental outcomes, including supporting the provision of green infrastructure and sustainable drainage as part of long term, sustainable growth.

As set out in the policy, there is a substantial funding gap, which could limit the ability of key infrastructure delivery to support growth across London. This could cause challenges and uncertainties for both local authorities and communities.

Changes to the scoring matrix as a result of this additional text are set out below.

Table 59: DF1 Delivery of the plan and planning obligations

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
SEA																								
Short Term						+	n/a		n/a	n/a	+	?	?	n/a	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a
Medium Term						+	n/a		n/a	n/a	+	+	+	n/a	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a
Long Term						++	n/a		n/a	n/a	+	+	+	n/a	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a
Direct / Indirect						I	n/a		n/a	n/a	I	I	I	n/a	I	I	I	n/a	I	I	n/a	n/a	n/a	n/a
Temporary / Permanent						P	n/a		n/a	n/a	P	P	P	n/a	P	P	P	n/a	P	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global						L	n/a		n/a	n/a	L	L	L	n/a	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a
EQIA																								
Short Term	?	?	?	n/a	+	?	n/a	n/a	n/a	n/a	+	?	?	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Medium Term	?	?	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Long Term	?	?	+	n/a	+	+	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Direct / Indirect	I	I	I	n/a	I	I	n/a	n/a	n/a	n/a	I	I	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	P/T	P/T	P	n/a	P	P	n/a	n/a	n/a	n/a	P	P	P	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/GL	L/GL	L	n/a	L	L	n/a	n/a	n/a	n/a	L	L	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HIA																								
Short Term	n/a	n/a	?		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	n/a	n/a	+		+				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	n/a	n/a	I		I				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	n/a	n/a	P		P				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	L		L				n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
CSIA																								
Short Term				n/a					n/a															
Medium Term				n/a					n/a															
Long Term				n/a					n/a															
Direct / Indirect				n/a					n/a															
Temporary / Permanent				n/a					n/a															
Local / Greater London / Wider Region / Global				n/a					n/a															

Objectives

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

5 Summary

This document details the review of IIA consultation responses and the Policy changes. The reassessment incorporated Policy changes and comments from consultation responses, updating the previous IIA assessment, published in December 2017. This reassessment has been undertaken following the approach used in the previous assessment.

There have been minor amendments to the Policy scoring, but overall there has not been a significant shift in the outcomes and aims of the London Plan that would warrant extensive reassessment. This report will be used to inform the inspector for the examination in public phase, to be held towards the end of this year. Following this, the revised version of the IIA will be published along the New London Plan next year.

Appendix A

Screening of policy amendments

Change ref no.	Pol/para/table/map	Suggested change <i>red bold</i> = new text; <i>red-strikethrough</i> = deleted text	In response to	Reason	Further IIA Assessment?
Chapter 1 Planning London's Future (Good Growth Policies)					
ESC.1.1	Paragraph 1.0.1	1.0.1 London's growth and development is shaped by the decisions that are made every day by planners, planning applicants, and decision-makers and Londoners across the city.	Just Space	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.2	Paragraph 1.0.3A	<i>Insert new paragraph 1.0.3A</i> 1.0.3A By setting a new level of ambition for the people who make all of London's planning decisions, this London Plan will help realise the Mayor's vision of creating create a better city for all Londoners, where no one is left behind	Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.3	GG1 Paragraph 1.1.1	1.1.1 London is made up of diverse communities. Its neighbourhoods, schools, workplaces, parks, community centres and all the other times and places Londoners come together give the city its cultural character and create its future. Planning for Good Growth means planning for with these communities – both existing and new - helping them to flourish and making new connections between them, and eroding inequalities.		Readability and consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.
ESC.1.4	GG1 Paragraph 1.1.2	1.1.2 40 per cent of Londoners are from Black, Asian and Minority Ethnic (BAME) backgrounds, and the city is home to a million EU citizens, and 1.2 million disabled people, and up to 900,000 people who identify as LGBT+. Over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is project to increase by 90 per cent. The success of London's communities relies upon t This diversity is essential to the success of London's communities. To keep them strong, To maintain this London must-remain open, and inclusive, and allowing everyone to share in and contribute towards the city's success.	Age UK London and UCL urban laboratory	Factual update and clarification	Reassessment required to ensure the assessment, particularly the EqIA, outlines the importance of other groups regarding age and LGBT+.
ESC.1.5	GG1 Paragraph 1.1.3	1.1.3 This will not be easy. London is one of the richest cities in the world, but it is also home to some of the poorest communities in the country,		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.1.6	GG1 Paragraph 1.1.4	1.1.4 Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, built forms that work with local heritage and identity , and social, physical and environmental infrastructure that meets London's diverse	Historic England	Clarification	Reassessment required to ensure heritage is assessed, particularly within the SEA.

		needs is essential if London is to maintain and develop strong and inclusive communities.			
ESC.1.7	GG1 Paragraph 1.1.5	1.1.5 Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for the full diversity of its inhabitants. all Londoners.		Readability and clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.8	GG1	Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:	Individual and Atkins	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.9	GG1 AA	<i>Insert new clause AA</i> AA seek to ensure changes to the physical environment achieve an overall positive contribution to London.	InLinkUK	Clarification	Minor addition, which has no consequences for the assessment.
ESC.1.10	GG1 B	B provide access to good quality community spaces , services and amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.	Selby Trust and community groups	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.11	GG1 BA	<i>Previous clause A is now BA</i> A BA seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city.	Access Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.12	GG1 C	C ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage and community buy-in ownership , and where communities can develop and flourish thrive .	Access Association and Crest Nicholson	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.1.13	GG1 D	D promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction building relationships during the daytime, evening and night time.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.14	GG1 E	E ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity , legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.1.15	GG1 F	F support and promote the creation of a London where all Londoners, including children and young people , older people, disabled people, and people with young children, as well as people with other protected characteristics , can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.	Individual and UCL urban laboratories individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.16	GG1 FA	<i>Insert new clause FA</i> FA support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities.		Consistency with other GLA strategies	Reassessment required to ensure the assessment, particularly the EqIA, outlines the importance of other groups regarding age and LGBT+.
ESC.1.17	GG2 Paragraph 1.2.3	1.2.3 The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as 'agglomeration', maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services, and public transport and other infrastructure that neighbourhoods need to work. They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses.	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.18	GG2 Paragraph 1.2.6	1.2.6 As London develops, the Mayor's Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50 per cent green cover across London, will be important to help London become a National Park City.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.19	GG2 Paragraph 1.2.7	1.2.7 London's distinctive character and heritage is why many people want to come to the city. London's heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can should be used positively to guide and	Historic England and London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.

		stimulate growth, and create distinctive, attractive and cherished places.			
ESC.1.20	GG2	To create successful high-density , mixed-use places that make the best use of land, those involved in planning and development must:	LB Islington, LB Harrow LB Hillingdon and London Forum of Amenity & Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.21	GG2 A	A enable prioritise the development of brownfield land, prioritising Opportunity Areas, brownfield land , surplus public sector land, and sites which are well-connected by existing or planned Tube and rail stations, and sites within and on the edge of town centres, and as well as utilising small sites.	LB Brent	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.22	GG2 B	B proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services , applying a design-led approach.	LB Lewisham and London NHS CCG	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.23	GG2 C	C understand what is valued about existing places and use this as a catalyst for growth, renewal , and place-making, strengthening London's distinct and varied character.	Friends of the Earth	Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.1.24	GG2 D	D protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.	LB Hillingdon and Royal Society for the Protection of Birds	Clarification and consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.1.25	GG3 Paragraph 1.3.1	1.3.1 The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live.	LB Southwark, London Healthier Places Network	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.26	GG3 Paragraph 1.3.2	1.3.2 As set out in the Mayor's draft Health Inequalities Strategy, the the scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities. Delivering Good Growth will involve prioritising health in all London's planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.	LB Camden	Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.

ESC.1.27	GG3 Paragraph 1.3.3	1.3.3Access to green and open spaces, including waterways, can improve health, but access and quality varies widely across the city...	London Wildlife Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.28	GG3 B	B promote more active and healthy lives lifestyles for all Londoners and enable them to make healthy choices.	My Fair London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.29	GG3 D	D assess the potential impacts of development proposals and development plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts , and help reduce health inequalities, for example through the use of Health Impact Assessments.	Public Health England London NHS CCG London Assembly	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.30	GG3 DA	<i>Insert new clause DA</i> DA plan for appropriate health and care infrastructure to address the needs of London's changing and growing population.	Office of London CCGs, LB Lewisham	Clarification	Minor addition, which has no consequences for the assessment.
ESC.1.31	GG3 DB	<i>Insert new clause DB</i> DB seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.	Friends of the Earth	Clarification	Minor addition, which has no consequences for the assessment.
ESC.1.32	GG3 E	E plan for improved access to green spaces, improvement to their quality, and the provision of new green infrastructure, and spaces for play, recreation and sports.	London Volleyball, Sports England, LB Harrow, LB Richmond, LB Wandsworth	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.33	GG4 Paragraph 1.4.2	1.4.2 The state of London's housing market has implications for the makeup and diversity of the city. Affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. The failure to provide sufficient numbers of new homes to meet London's need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.	Barton Wilmore London Chamber of Commerce	Clarification	Minor addition, which has no consequences for the assessment.
ESC.1.34	GG4 Paragraph 1.4.3	1.4.3 The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing	Numerous community/campaign groups.	Clarification	Minor change to wording, which has no consequences for the assessment.

		in particular. London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable if the needs of Londoners are to be met. This supports the Mayor's strategic target of 50 per cent of all new homes being genuinely affordable, which is based on viability evidence . 270,000 homes are in the planning pipeline, but delivery is not keeping pace.			
ESC.1.35	GG4 Paragraph 1.4.5	1.4.5 To meet the growing need, London must seek to deliver new homes through a wide range of development options every available means . Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market. Building more housing as part of the development of town centres will also be important, providing homes in well-connected places that will help to sustain local communities.	Chiswick Protection Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.36	GG4 Paragraph 1.4.5A	<i>Insert new paragraph 1.5.A</i> 1.4.5A The homebuilding industry itself also needs greater diversity to reduce our reliance on a small number of large private developers. New and innovative approaches to development, including Build to Rent, community-led housing, and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-manufacturing. Alongside this, there will need to be a greater emphasis on the role councils and housing associations play in building genuinely affordable homes.	Boroughs	Clarification	Minor addition, which has no consequences for the assessment.
ESC.1.37	GG4 Paragraph 1.4.6	1.4.6 There are a range of other measures that have an impact on the availability of homes. For example, E existing homes must not be left empty, and have the potential to be brought back into use as affordable housing The Build to Rent model can deliver homes for rent quickly, and B oroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted.	Boroughs	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.1.38	GG4 Paragraph 1.4.7	1.4.7 ... Together Along with the London Housing Strategy, this London Plan establishes the framework...		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.1.39	GG4 D	D identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing...	LB Greenwich	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.40	GG4 Paragraph 1.4.9	1.4.9 ...The people who these businesses employ need strong communities, good public transport connections , pleasant environments that promote good health, access to shops and	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.

		local services , and good quality, affordable homes in places they want to live...			
ESC.1.41	GG4 Paragraph 1.4.10	1.4.10 ...growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs . Reasonably-priced, good quality employment space will be needed across London to make this happen.	LB Kingston The Putney Society Centre for Accessible Environments	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.42	GG5 G	G maximise make the fullest use of London's existing and future public transport, walking and cycling network...	LB Newham	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.43	GG5 Paragraph 1.5.3	1.5.3 ...developments must plan for a more integrated approach to water management, while protecting against minimising flood risk.	Environment Agency London Wildlife Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.44	GG6 B	B ...making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating against and avoiding contributing to the urban heat island effect.	Trees and Design Action Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.1.45	GG6 D	D take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.	Levitt Bernstein LLP	Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 2 Spatial Development Patterns					
ESC.2.1	Figure 2.1	<i>Map to be amended</i> Figure 2.1 – The Key Diagram		Factual	Minor change, which has no consequences for the assessment.
ESC.2.2	SD1 A 1 d	To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 1)..... d) are prepared in an open and timely manner		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.2.3	SD 1 B 3	Boroughs, through their Development Plans and decisions should: 3) plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities , working with community and infrastructure providers where necessary.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.2.4	SD1 B 3A	B Boroughs, through Development Plans and decisions, should: 3A) recognise the role of heritage in place-making	Historic England	Clarification	Reassessment required to ensure heritage is fully assessed by the IIA.
ESC.2.5	SD1 B 4	B Boroughs, through Development Plans and decisions, should: 4) recognise that larger areas can define their own character and density establish the capacity for growth in the Opportunity Areas in accordance with Policy D2	Historic England	Clarification	Minor addition, which has no consequences for the assessment.

		Delivering good design and Policy D6 Optimising density			
ESC.2.6	SD1 Paragraph 2.1.1	2.1.1 Opportunity Areas are identified as the capital's most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two.	LB Haringey	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.7	SD1 Paragraph 2.1.3	2.1.3 The Mayor will provide the support and leadership to ensure Opportunity Areas deliver their growth potential for Londoners . He will promote and champion the areas as key locations for investment, and will intervene where required so that an ambitious, imaginative and inclusive approach is taken to accelerate and realise their growth and development..... This approach should include understanding the existing character and context of an area, in accordance with Policy D2.	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.8	SD1 Paragraph 2.1.6	2.1.6 ...In order to meet London's needs and ensure sustainable development, all stakeholders should seek to proactively promote and enable growth in these areas in line with the policies in this Plan...		Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.2.9	SD1 Paragraph 2.1.7	2.1.7 The key growth corridors within London are set out below. <u>Policy SD2 Collaboration in the Wider South East</u> and Figure 2.15 include Strategic Infrastructure Priorities that link into the wider city region. The Mayor will work with authorities outside London on the cross-boundary implications of Opportunity Areas.	SESL	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.10	SD1 Paragraph 2.1.10	2.1.10 The Mayor's Transport Strategy seeks to ensure that dedicated public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through transport investment and planning, and commits to the setting of sets -ambitious mode share targets.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.11	SD1 Paragraph 2.1.11	2.1.11 The development value in these areas can, in some cases, also contribute to the funding of the schemes. In order to support these priorities, this Plan sets out further guidance on the se-specific Opportunity Areas below, grouped by growth corridor.....		Readability	Minor change to wording, which has no consequences for the assessment.

ESC.2.12	SD1 Paragraph 2.1.11	2.1.11.....Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long-term capacity for homes and jobs will need to be phased in a way that maximises the benefits from of major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before the new infrastructure is available. schemes are delivered.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.13	Table 2.1	<i>Insert new table</i> Table 2.1 - Opportunity Area Indicative guidelines for new homes and jobs <i>See Extract</i>	LB Islington, LB Lambeth, LB Hackney, LB Wandsworth, Just Space, HB Reavis Ltd	Readability	Minor change, which has no consequences for the assessment.
ESC.2.14	SD1 Paragraph 2.1.16	2.1.16 The proposal for an extension of the a Bakerloo Line Extension station at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London and the emerging areas of artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across and along the traffic-dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.	LB Lewisham	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.15	SD1 Paragraph 2.1.18	2.1.18..... To support the area, approximately 2,700 new homes can be accommodated in the heart of the town centre. The realignment of the A205 will assist in the transformation of the town centre.	LB Lewisham	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.16	SD1 Paragraph 2.1.22	2.1.22 In particular it identified four areas where there is scope for significant change: <ul style="list-style-type: none">Norbiton, London Road and Cambridge Road Estate	Royal Borough of Kingston	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.17	SD1 Paragraph 2.1.23	2.1.23 ... It should also explore how the use of industrial land can be intensified to make more efficient use of land. Kingston town centre, with its ancient market is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks.	Historic England, RB of Kingston, Kingston First	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.18	SD1 Paragraph 2.1.24	2.1.14 In the longer term, and in line with the opening of Crossrail 2 in 2033, there may be potential to accommodate growth in the following areas: <ul style="list-style-type: none">Berrylands Station and Hogsmill Valley	RB Kingston	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.2.19	SD1 Paragraph 2.1.26	2.1.26 Clapham Junction is Europe's busiest rail interchange station, and a designated Major town centre. serving key commuter routes from West London and Southern England, and is identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers' public transport experience. The proposal for a Crossrail 2 station represents a unique opportunity to make more efficient use of land surrounding the station for residential and commercial development, including new offices as part of the designated Major town centre. The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers...	Network Rail, Innova	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.20	SD1 Paragraph 2.1.33	2.1.33.... It should also set out how site assembly and provision of better links with the town centre and surrounding areas including Alexandra Palace and Alexandra Park hold the key to comprehensive development.	LB Haringey	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.21	SD1 Paragraph 2.1.49	2.1.49 The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity. Silo D is a heritage asset at risk which provides opportunities for heritage and cultural-led regeneration.	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.22	SD1 Paragraph 2.1.54	2.1.54 ...The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. Belvedere is recognised as having potential as a future District centre.	Bexley	Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.2.23	SD1 Paragraph 2.1.57	2.1.57 A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. Positive masterplanning will be used to create an attractive new town centre with distinctive character.	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.24	SD1 Paragraph 2.1.60	2.1.60 The Elizabeth Line will open in 2019 and transform connectivity along the route. It is already leading to increased development in central London and has the potential to bring	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.

		forward growth and development from Stratford eastwards. This includes the area of the London Legacy Development Corporation, which continues to secure the legacy of the 2012 Olympic and Paralympic Games.			
ESC.2.25	SD1 Paragraph 2.1.64A	<i>Insert new paragraph 2.1.64A</i> 2.1.64A The Great West Corridor is one of London's key approaches and presents unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London's most significant historic landscapes including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gardens Kew World Heritage Site. Masterplanning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area's heritage should be fully explored.	Historic England	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.26	Figure 2.11	<i>Map to be amended</i> Figure 2.11 - Central London		Factual	Minor change, which has no consequences for the assessment.
ESC.2.27	Figure 2.12	Trams Triangle		Factual correction	Minor change, which has no consequences for the assessment.
ESC.2.28	SD2 B	B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by up-to-date , consistent technical evidence and monitoring .	Barton Wilmore for developer consortium, Surrey and other county councils	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.29	SD2 E	Ethe need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, biodiversity and green infrastructure), and waste management, (including and the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.	Environment Agency, Natural England, Many environmental organisations, Kent County Council, Bucks Districts and London Waste and Recycling Partnership	Clarification	Reassessment required to ensure improvements to biodiversity and green infrastructure are assessed within the IIA.
ESC.2.30	SD2 Paragraph 2.2.1	2.2.1 London is not an island. There are 130 authorities in the WSE outside London.		Factual	Minor change to wording, which has no consequences for the assessment.
ESC.2.31	SD2 Paragraph 2.2.5	2.2.5Opportunities to collaborate should be considered where mutual benefits can be achieved. The scope of these opportunities may vary depending on circumstances	Authorities outside London	Clarifications	Minor change to wording, which has no consequences for the assessment.

		including proximity to London. The promotion of good links to/from potential employment locations outside London by the Mayor to help realise corresponding employment opportunities within and outside London is an example of such how mutual benefits can be achieved. The Golden Triangle (life science sector collaboration with Oxford and Cambridge) and the Thames Estuary Production Corridor (delivering large-scale cultural infrastructure) are good examples of collaboration that is already underway.			
ESC.2.32	SD2 Paragraph 2.2.6	2.2.6 The non-statutory strategic structure for cooperation that is in place complements the GLA Act requirement for the spatial development strategy to address matters of strategic importance to Greater London (GLA Act, VIII, S.334 (5)) and the Mayor's statutory Duties to Inform and Consult (GLA Act, VIII, S.335 'with adjoining counties and districts', S.339 'authorities outside London', S.348 'authorities in the vicinity of London').		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.33	SD2 Paragraph 2.2.7	2.2.7 In addition, Planning Practice Guidance states that 'cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively'. The Mayor will share his responses to Local Plans outside the capital with interested London boroughs.	Developers and London Forum	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.34	SD2 Paragraph 2.2.8	2.2.8.... However, locally- specific cross-border matters between individual London boroughs and authorities beyond London may should be addressed most effectively by the relevant local authorities on the basis of their Duties to Cooperate.	London Forum	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.35	SD3 A	A The Mayor will work with relevant WSE partners strategic and local authorities , Government and other agencies interested partners to realise the growth potential of the wider city region WSE and beyond through investment in strategic infrastructure to support housing and business development in particular in growth locations to meet need and secure mutual benefits for London and relevant partners.	Barton Wilmore on behalf of consortium of developers	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.36	SD3 B	B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans outside London.		Factual	Minor change to wording, which has no consequences for the assessment.
ESC.2.37	SD3 Paragraph 2.3.1	2.3.1 This Plan aims to accommodate all the vast majority of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.38	SD3 Paragraph 2.3.3	2.3.3 The GLA's new Strategic Housing Market Assessment shows that London has a need for approximately 66,000		Clarification	Minor change to wording, which has no consequences for the assessment.

		additional homes a year. The new Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.			
ESC.2.39	SD3 Paragraph 2.3.4	2.3.4 Despite Although this Plan is seeking to accommodate the vast majority of London's future growth within its boundary , some migration will continue Given the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to also plan for longer-term contingencies. Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.	Authorities outside London	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.40	SD3 Paragraph 2.3.5	2.3.5... Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Crossrail 2 and HS2 are examples with such potential. Another area of focus could be proposals for new/garden settlements with good links to London. Government has already indicated support for a similar approach.	Authorities outside London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.41	SD3 Paragraph 2.3.6	2.3.6 <i>Moved</i>	Authorities outside London	Clarification	
ESC.2.42	SD3 Paragraph 2.3.7	2.3.7....The Mayor will work with key willing partners, including local authorities, Local Enterprise Partnerships, Sub-national Transport Bodies , the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.43	SD3 Paragraph 2.3.8	2.3.8 It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, the Mayor will respond to Local Plans outside London and support for example Memoranda of Understanding or other mechanisms to formalise partnership agreements/commitments between relevant authorities.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.44	SD3 Paragraph 2.3.8A	<i>Insert new paragraph 2.3.8A</i>	Barton Wilmore for developer consortium	Clarification	Minor change to wording, which has no consequences for the assessment.

		2.3.8A The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. The schemes within these areas are at different planning stages. Their delivery will have to be phased. Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones.	and authorities outside London		
ESC.2.45	SD4 F	F The vitality and viability of the international shopping and leisure destinations of the West End (including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area) and Knightsbridge together with other CAZ retail clusters should be supported.	Westminster City Council, London Property Alliance	Clarification – for consistency with paragraph 2.4.10B	Minor change to wording, which has no consequences for the assessment.
ESC.2.46	SD4 H	H The attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced, including through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets).	The Access Association, City of London Corporation	Clarification	Reassessment required to ensure inclusive design is assessed by the IIA, particularly within the EqIA.
ESC.2.47	SD4 K	K The attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved and enhanced .	Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.48	SD4 M	M Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs (North) to support the needs of businesses and activities within these areas.	LB Tower Hamlets	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.49	SD4 N	N In Development Plans, boroughs should: 1) define the detailed boundaries of the CAZ, the Isle of Dogs (North), town centres (including the International centres), CAZ retail clusters, Special Policy Areas and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16 2) develop locally sensitive policies to meet this Plan's objectives for the CAZ 3) define the detailed boundaries of the CAZ satellite and reserve locations.	West End Partnership, Grosvenor Britain, Ireland, Covent Garden Community Association and Get Living London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.50	SD4 Paragraph 2.4.3 Footnote 10 and 11	2.4.3 For the purposes of CAZ policies, the Northern Isle of Dogs (North) (NIODN) is recognised as a CAZ 'satellite' ¹⁰ location for world city office functions. Future potential reserve ¹¹ locations for CAZ office functions are Stratford and Old Oak Common <i>Amend footnotes 10 and 11</i>	LB Tower Hamlets, LB Newham, East of England Local Government Association, Local London Partnership and Get Living London	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>10 The term 'satellite' is used to indicate that the NODN is geographically separate from the CAZ but it is treated as part of the CAZ in London Plan policy</p> <p>11 These locations are not formally within the CAZ and are identified as future strategic reserves for nationally significant office functions in the event that future demand for office space exceeds development capacity in the CAZ. Specific policy directions for Stratford and Old Oak Common are contained within supporting text to Policy SD1 (Opportunity Areas) and Annex 1 (Town Centre Network).</p>			
ESC.2.51	SD4 Paragraph 2.4.4A	<p><i>Insert new paragraph 2.4.4A</i></p> <p>2.4.4A Development Plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances.</p>	LB Islington, City of London Corporation, Covent Garden Community Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.52	SD4 Paragraph 2.4.5A	<p><i>Insert new paragraph 2.4.4A</i></p> <p>2.4.5A The City of London and the Isle of Dogs (North) are nationally important locations for globally-oriented financial and business services. The West End is a vibrant mixed-use business location, an internationally-renowned shopping, cultural and visitor destination and home to several world-leading academic institutions as well as a significant residential population. The unique roles of these locations and their strategic contribution to the economy, culture and identity of the capital should be promoted and enhanced.</p>	London First, London Property Alliance, West End Partnership, Grosvenor Britain & Ireland, Capco Covent Garden, New West End Company, Crown Estate, Landsec, Heart of London Business Alliance	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.53	SD4 Paragraph 2.4.7	2.4.7 The distinct environment and heritage of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives ¹⁴ such as the transformation of the Oxford Street district .	West End Partnership, Grosvenor Britain & Ireland, London First, London Property Alliance	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.54	SD4 Paragraph 2.4.10	2.4.10 It contains a range of unique centres and mixed-use clusters with a predominant retail function which perform different roles in the wider London Plan town centre network (see Policy SD8 Town Centre network policies) including: ...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.55	SD4 Paragraph 2.4.11	2.4.11.... Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters above should be enhanced, supporting their adaptation and diversification , along with improvements to the quality of the environment and public realm.	London First, London Property Alliance, New West End Company, Crown Estate, Grosvenor Britain & Ireland, Capco Covent Garden, Heart of	Clarification	Minor change to wording, which has no consequences for the assessment.

			London Business Alliance		
ESC.2.56	SD4 Paragraph 2.4.12 New footnote 16A	2.4.12 The CAZ contains several other important specialist clusters of activity which contribute towards the capital's international and national roles. These clusters include contain significant concentrations of strategic functions of arts and culture , state, health, law and education and are represented spatially in the CAZ Diagram (Figure 2.16) the Welcome Trust and the Francis Crick Institute (and on the CAZ fringe ^{16A} at Whitechapel and White City). <i>Insert new footnote 16A</i> ^{16A}The CAZ fringe refers to areas that have a functional relationship with the CAZ and lie within reasonable proximity to the CAZ but do not lie within the Zone itself	London Property Alliance, LB Tower Hamlets	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.57	SD4 Paragraph 2.4.13	2.4.13 Special Policy Areas are supported, may be defined locally in specific and exceptional circumstances particularly where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage.	Westminster City Council, Just Space	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.58	SD4 Paragraph 2.4.13	2.4.13.....Given the operation of the Use Classes Order and permitted development rights, Special Policy Areas often require the collaboration of landowners to achieve their objectives. They should only be defined in the above exceptional circumstances to avoid stifling innovation and change that is one of the defining features of the CAZ.	Westminster City Council, Just Space	Clarification	Minor amendment, which has no consequences for the assessment.
ESC.2.59	SD4 Figure 2.16	MAP TO BE AMENDED Figure 2.16 – CAZ Diagram		Factual Update	Minor change, which has no consequences for the assessment.
ESC.2.60	SD4 Figure 2.16	Insert the indicative area of the 'West End' (to match the indicative boundary in the West End Partnership vision). Refinement to the area covered by the West End cluster of Arts, culture and entertainment and amend key to read: '1. West End (including Soho/Covent Garden)'.	West End Partnership	Clarification	Minor change, which has no consequences for the assessment.
ESC.2.61	SD4 Figure 2.16	Minor refinement to the indicative area of the Victoria Opportunity Area	London Property Alliance, Landsec	Clarification	Minor change, which has no consequences for the assessment.
ESC.2.62	SD4 Figure 2.16	Minor refinement to the indicative area of the Isle of Dogs (North)	Individual	Clarification of the indicative area covered by the Isle of Dogs (North).	Minor change, which has no consequences for the assessment.

ESC.2.63	SD4 Figure 2.16	Amend key: Retail clusters and Town Centres		Consistency	Minor change, which has no consequences for the assessment.
ESC.2.64	Figure 2.16	Amend key: 3 King's Cross —St. Pancreas	LB Camden	Consistency	Minor change, which has no consequences for the assessment.
ESC.2.65	Figure 2.16	Amend key: 9 London Bridge, Borough and Bankside		Consistency	Minor change, which has no consequences for the assessment.
ESC.2.66	SD4 Paragraph 2.4.15	2.4.15 Digital connectivity and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, applicants development proposals should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see <u>Policy S16 Digital connectivity infrastructure</u>).	London Forum of Civic and Amenity Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.67	SD4 Paragraph 2.4.16	2.4.16 Local Plans and development proposals should respond to issues related to climate change taking into account the distinct circumstances of the CAZ including the urban heat island effect (whereby the CAZ suffers from higher local temperatures than surrounding parts of London) and its vulnerability to surface water flooding due to low-lying land and the high proportion of impermeable surfaces.	Environment Agency	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.68	SD5 B	B Residential development is not appropriate in defined parts the commercial core of the City of London and Northern Isle of Dogs (detailed boundaries to be defined by boroughs in Development Plans).	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.69	SD5 C and D	<i>Deletion of clauses C 1 – C 5</i> <i>Clauses D 1 and D 2 are combined</i> C Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other core commercial areas of the CAZ except including: 1) other parts of the City of London and Northern Isle of Dogs (outside core areas in part B above) 2) the West End, Knightsbridge and other core commercial areas in the City of Westminster including Soho, Covent Garden, its Opportunity Areas and commercial parts of Marylebone and Fitzrovia	LB Islington, LB Tower Hamlets, LB Camden, Westminster City Council, Heart of London Business Alliance, London Forum of Civic and Amenity Societies, London Property Alliance, Unite Students, Drew, Stevenson	Clarification to simplify the provisions of SD5 Parts C and D.	Minor change to wording, which has no consequences for the assessment.

		<p>3) commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework</p> <p>4) all other Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant & Castle)</p> <p>5) identified clusters of specialist CAZ strategic functions, CAZ retail clusters and locally identified Special Policy Areas.</p> <p>D offices and other CAZ strategic functions are given equal weight relative to new residential in other parts of the CAZ not covered in parts B or C above including:</p> <ol style="list-style-type: none"> 1) the Vauxhall, Nine Elms, Battersea Opportunity Area and the 2) Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and 3) wholly residential streets or predominantly residential neighbourhoods or wholly residential streets (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters). 			
ESC.2.70	SD5 E	E In Development Plans, boroughs should develop local policies and define detailed boundaries for the areas in parts B, and C and D above.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.2.71	SD5 H	H Residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices. and/or To achieve this , alternative provision is made for the provision of equivalent or net additional office space can be made near the development (including through swaps and credits – see part I below). This should be within the CAZ and near the development.	Canary Wharf Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.72	SD5 Paragraph 2.5.3	2.5.3 The agglomerations of offices and other CAZ strategic functions should not be compromised by new residential development . Given their strategic importance, as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy). In particular, Residential development is considered inappropriate in defined parts the commercial core areas of the City of London and Northern Isle of Dogs reflecting the prominent role of these locations in providing capacity for world city business functions. This policy will ensure that the current and future potential to assemble and deliver office development	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.

		in these locations is not compromised by residential development.			
ESC.2.73	SD5 Paragraph 2.5.4	2.5.4 Offices and other CAZ strategic functions are given greater weight relative to new residential development in the West End and other core commercial areas of the CAZ reflecting the importance attached to CAZ strategic functions in these locations.		Text moved to paragraph 2.5.3 and consistency	Restructuring of text, which has no consequences for the assessment.
ESC.2.74	SD5 Paragraph 2.5.6	2.5.6 Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate. Evidence required to demonstrate no reasonable prospect of a site being used for offices is set out in paragraph 6.1.7 of this Plan.	Federation of Small Businesses	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.75	SD5 Paragraph 2.5.8	2.5.8 Land use swaps, and credits and off-site contributions can be used to support local balances between CAZ strategic functions and housing.	GLA	Clarification.	Minor change to wording, which has no consequences for the assessment.
ESC.2.76	SD6 Title	Policy SD6 Town centres and high streets	Vital OKR, Federation of Master Builders	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.77	SD6 A 1	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by: 1) encouraging strong, resilient, accessible, and inclusive and viable hubs for with a diverse range of uses that meet the needs of Londoners, including main town centre uses, including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development uses	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.78	SD6 A 2	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by: 2) identifying locations for mixed-use or housing-led intensification and to optimise residential growth potential higher-density renewal , securing a high-quality environment and complementing local character and heritage assets	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.79	SD6 A 3	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by:	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.

		3) the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities by walking, cycling and public transport			
ESC.2.80	SD6 A 4	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by: 4) strengthening the role of town centres as the a main focus for Londoners' sense of place and local identity in the capital	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.81	SD6 A 5	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by: 5) ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.82	SD6 A 6	A The vitality and viability of London's varied town centres and their vitality and viability should be promoted and enhanced as by: 6) a key mechanism for supporting the role of town centres in building sustainable, healthy, and walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.83	SD6 B	B The adaptation and restructuring diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.	LB Richmond Upon Thames, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.84	SD6 C	C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development that makes best use of land , capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.	LB Brent, LB Harrow, LB Bexley, individual	Clarification	Reassessment required to ensure the benefits of making the best use of land is assessed within the IIA.
ESC.2.85	SD6 C	Cfuture accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.	LB Haringey, LB Harrow, LB Southwark, LB Tower Hamlets, LB Brent, LB Islington	Clarification - text moved to supporting text	Restructuring of text, which has no consequences for the assessment.
ESC.2.86	SD6 D	D The particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including for smaller households, Build to Rent,	Local London Partnership, Westminster	Clarification	Minor change to wording, which has no consequences for the assessment.

		older people's housing and student accommodation should be considered and encouraged.			
ESC.2.87	SD6 E	E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable and low-cost business space (Policy E2: Low-cost business space , Policy E3 Affordable workspace)....	LB Islington, LB Harrow, LB Haringey, Vital OKR	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.88	SD6 HA	<i>Insert new policy sub clause HA</i> HA The varied role of London's high streets should be supported and enhanced.	Vital OKR, Federation of Master Builders	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.89	SD6 I	I The provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents , and facilities should be located in places that maximise footfall to surrounding town centre uses.	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.90	SD6 Paragraph 2.6.1	2.6.1 London's town centres are central to the lives of Londoners. They provide a focus for the local community, both geographically and in relation to the sense of identity and broad mix of uses they provide. Policy SD6 Town centres and high streets does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ). 19A - Policy SD6 Town centres and high streets applies to the entirety of Angel town centre and Elephant and Castle town centre.	City of London Corporation, Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.91	SD6 Paragraph 2.6.1A	<i>Paragraphs 2.6.1 is split into two paragraphs.</i> 2.6.1A The spaces within and around town centres have an important public function, with high streets, public squares, markets, parks, gardens.....			Minor change to wording, which has no consequences for the assessment.
ESC.2.92	SD6 Paragraph 2.6.1B	2.6.1B High streets are one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within town centres should be promoted and enhanced.	Vital OKR, Federation of Master Builders	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.2.93	SD6 Paragraph 2.6.2	2.6.2 Over the years Town centres have over the years absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current and		Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.94	SD6 Paragraph 2.6.2	2.6.2...This need for adaptation and diversification , together with their good public transport accessibility, makes many town centres appropriate locations for residential-led intensification or mixed-use high-density development that makes best use of land .	LB Brent, LB Harrow, LB Bexley	Clarification	Reassessment required to ensure intensification and the best use of land are assessed in the IIA.
ESC.2.95	SD6 Paragraph 2.6.4A	<i>Insert new paragraph 2.6.4A</i> 2.6.4A Residential development plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.	Silvertown Homes, Redrow Homes London Division	Clarification	Reassessment required to ensure the promotion of residential-only schemes, where appropriate, are assessed within the IIA.
ESC.2.96	SD7 and SD8	<ul style="list-style-type: none"> <i>Policies SD7 and SD8 have been swapped</i> 	City of London Corp, LB Southwark	Readability - SD6 and current SD8 do not apply to Town Centres located wholly within the CAZ.	Restructuring of text, which has no consequences for the assessment
ESC.2.97	SD 8 7	<ul style="list-style-type: none"> Policy SD87 Town centres: development principles and Development Plan Documents 	City of London Corp, LB Southwark		Minor change to wording, which has no consequences for the assessment.
ESC.2.98	SD 8 7 A 1	A Development Plans and development proposals should take a town centres first approach by: 1) adopting a applying the sequential approach test to applications for accommodating main town centre uses, including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused locating them on sites within town centres, or then (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport	Galliard Homes, LB Tower Hamlets, Halfords, LB Islington	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.99	SD 8 7 A 2	A Development Plans and development proposals should take a town centres first approach by 2) firmly resisting discouraging out-of-centre development...	Ministry of Housing, Communities and Local Government, Lidl UK GmbH, Halfords, Sainsburys Supermarkets Ltd, Silvertown Homes,	Clarification	Minor change to wording, which has no consequences for the assessment.

			London Hotel Group, Next Plc		
ESC.2.10 0	SD87 A 2	A Development Plans and development proposals should take a town centres first approach by: 2)... main town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices)	Galliard Homes LB Tower Hamlets, Halfords	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.10 1	SD87 A 3	A Development Plans and development proposals should take a town centres first approach by: 3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town-centre-retail, leisure and office uses in part A(1) above that are not in accordance with the Development Plan	LB Tower Hamlets	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.10 2	SD87 B 1A	<i>Insert new clause B 1A:</i> B In Development Plans, boroughs should: 1A) consider the protection of out-of-centre high streets as neighbourhood centres, local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see Policy H1 Increasing housing supply)	London Assembly Planning Committee, Just Space	Clarification	Reassessment required to ensure high streets are assessed alongside town centres in the IIA.
ESC.2.10 3	SD87 B 2	B In Development Plans, boroughs should: 2) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres and high streets to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD78 Town centre network)		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.2.10 4	SD87 B 3	B In Development Plans, boroughs should: 3) develop policies for the edge and fringes of town centres areas , revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a	Halfords, LB Tower Hamlets	Clarification	Minor change to wording, which has no consequences for the assessment.

		range of non-residential uses particularly in secondary frontages taking into account local circumstances			
ESC.2.10 5	SD 8 7 B 4 dA	<i>New policy B 4) dA):</i> B In Development Plans, boroughs should: 4) ..Criteria to consider in assessing the potential for intensification in town centres include:.. dA) capacity and proximity of social infrastructure	LB Redbridge, individual	Clarification	Reassessment required to ensure the capacity and proximity of social infrastructure is assessed in the IIA, particularly within the HIA.
ESC.2.10 6	Paragraph 2. 8 7.1 New footnote 21A	2. 8 7.1 ...In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages. Policy SD7 Town centres: development principles and Development Plan Documents does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ)^{21A}. <i>Insert new footnote 21A</i> 21A Policy SD7 Town centres: development principles and Development Plan Documents applies to the entirety of Angel town centre and Elephant and Castle town centre.	City of London Corporation, Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.10 7	Paragraph 2. 8 7.2	2. 8 7.2 Where edge-of-centre developments of town centre retail, leisure and office uses are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to retail, leisure and office development greater than a locally set floorspace threshold , or 2,500 sq m if a local floorspace threshold has not been set.	LB Hackney, LB Tower Hamlets	Clarification	Reassessment required to ensure out of centre housing developments are removed from the assessment, as this is repeated in another Policy.
ESC.2.10 8	Paragraph 2. 8 7.4	2. 8 7.4The location, design, type, and level of fit-out of commercial uses, particularly those in mixed-use development, should support the town centres first approach and ensure that commercial premises make a positive contribution to the vitality of the area and are quickly occupied. Out-of-centre housing-led developments should seek to maximise the provision of housing and create active frontages and welcoming streetscapes through the provision of ground floor windows, front doors and front gardens where appropriate.	LB Westminster	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.
ESC.2.10 9	SD 7 8 Title	<ul style="list-style-type: none"> Policy SD78 Town centre network 		Readability - SD6 and current SD8 do not apply	Minor change to wording, which has no consequences for the assessment.

				to Town Centres located wholly within the CAZ.	
ESC.2.11 0	SD78 B	B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD87 Town centres: development principles and Development Plan Documents). Diversification in Centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported. These centres may be reclassified at a lower level in the hierarchy through a coordinated approach with local planning authorities.	LB Harrow	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 1	SD78 C	C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local, and Neighbourhood centres and CAZ Retail Clusters can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see <u>Policy SD87 Town centres: development principles and Development Plan Documents</u>).	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 2	SD78 E	E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure , local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.	Levitt Bernstein	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 3	Paragraph 2. 78.4	2. 78.4 These eCentres with a future potential network classification in Table A1.1 (Town Centre Network) are not recommended for immediate reclassification, however it is recognised that they may be appropriate for future reclassification, subject to strategic and Local Plan policies and conditional on matters such as capacity analysis, impact assessments, land use, public transport, walking and cycling, planning approvals and full implementation.	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 4	Paragraph 2. 78.4	2. 78.4 ...Many of the areas identified as future potential town centres, and centres with the potential to be reclassified at a higher level in the town centre hierarchy (see Annex 1), currently contain retail parks, dominated by large format stores and heavily reliant on travel by car. For these areas to be reclassified, a clear strategy should be developed and implemented (see Policy SD9 Town centres: Local partnerships and implementation) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact.		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.2.11 5	Figure 2.17	Figure 2.17 to be updated to align with changes to Table A1.1 in Annex One.		Alignment with suggested changes to Annex One.	Minor change, which has no consequences for the assessment.
ESC.2.11 6	SD9 A	A Strategic and local partnership approaches should be supported and encouraged to develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development. strategic and local partnership approaches, community engagement. These partnerships may be in the form of town centre management, business associations, Neighbourhood Forums, trader associations and Business Improvement Districts, and should be inclusive and representative of the local community. should be supported and encouraged. Each town centre should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.	Green Party Group, London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 7	SD9 AA	<i>Insert new policy sub-clause AA</i> AA The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres in Table A1.1. Town Centre Strategies should be produced in partnership at the local level in a way that is inclusive and representative of the local community.	LB Camden, LB Bexley, LB Havering, LB Bromley, LB Redbridge, LB Southwark, Westminster City Council	Clarification	Minor addition, which has no consequences for the assessment.
ESC.2.11 8	SD9 Paragraph 2.9.1	2.9.1All town centres, however, will change – many of them significantly – due to the restructuring of the retail sector and other changes in the wider economy. It is therefore crucial that a A strategy is should therefore be developed for each town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, or town centres that are identified as future potential centres in Table A1.1. This is necessary to ensure that the local community continues to be well served and that the network of town centres across London continues to function successfully.	Borough	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.11 9	SD9 Paragraph 2.9.2	2.9.2 Town Centre Strategies should be tailored to each town centre, with a A clear vision should be developed with the local community, taking account of the town centre's strategic role, opportunities for growth, and potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London.	Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.12 0	SD9 Paragraph 2.9.2	2.9.2..... Town Centre Strategies should pay particular regard to the social and economic benefits of high streets and as well as their function and character within town centres, especially the formal and informal networks that support local communities. and They should also have regard to	Individual	Clarification	Minor change to wording, which has no consequences for the assessment.

		commercial and social activity that serves particular groups and communities.			
ESC.2.12 1	SD10 A 1	A Boroughs should: 1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans and develop policies that are based on a thorough understanding of the demographics of communities and their needs		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.12 2	SD10 A 2A	A Boroughs should: 2A) engage communities, particularly those in Strategic and Local Areas for Regeneration, at an early stage and throughout the development of local development documents, strategies and regeneration programmes.	London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group	Clarification	Reassessment required to ensure engagement with local communities regarding regeneration is considered within the IIA.
ESC.2.12 3	SD10 Paragraph 2.10.3	2.10.3... By taking an integrated, spatial approach to a wide range of issues, Development Plans and Opportunity Area Planning Frameworks have a key role to play in tackling spatial inequalities and the causes of deprivation. It is important that these are developed through engagement with local communities.	London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group	Clarification	Reassessment required to ensure engagement with local communities regarding regeneration is considered within the IIA.
ESC.2.12 4	SD10 Paragraph 2.10.4	2.10.4 In identifying Local Areas for Regeneration, boroughs should use their local knowledge and that of their communities to identify and understand the particular needs of the area. The individual measures of deprivation that make up the IMD and other evidence should be used to identify specific areas that are affected by particular issues, and regeneration strategies, investment and the approach taken in Local Plans should be tailored to reflect these...	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.2.12 5	SD10 Paragraph 2.10.4	2.10.4 ... in Local Plans should be tailored to reflect these. Local Plans should include policies that identify also look closely at the Strategic and Local Areas for Regeneration and address the particular issues that affect them and the surrounding areas.	London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt	Clarification	Minor change to wording, which has no consequences for the assessment.

			Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group		
ESC.2.12 6	SD10 Paragraph 2.10.6	2.10.6... In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities and other stakeholders , involving a broad spectrum of groups and individuals, to develop a shared vision for the area...	Canal & River Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 3 Design					
ESC.3.1	D1	<i>Policy restructure and clauses re-ordered</i>		To clarify policy meaning and structure	Minor change to wording, which has no consequences for the assessment.
ESC.3.2	D1 A & B	<p><i>Deleted first line of part A and B and reordered numbered and renumbered policy text in parts A and B and added three heading to group numbered policy text.</i></p> <p>Form and layout</p> <p>A1) A2) B1 2) A8 3) A3 4) A10 5)</p> <p>Experience</p> <p>A5 6) A6 7) A4 8) A7 9) A9 10) B6-11)</p> <p>Quality and character</p> <p>B4 12) B2 13) B3 14) B5 15)</p>	Boroughs	To clarify policy meaning and structure	Minor change to layout, which has no consequence for the assessment.
ESC.3.3	D1 Start of policy	<i>Changed initial policy text to part A and added new text</i>	Boroughs	To clarify policy meaning and structure	Minor changes to wording, which has no consequences for the assessment.

		<p>A Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:</p> <p>A The form and layout of a place should:</p> <p>B Development design should:</p>			
ESC.3.4	D1 A 2	<p>deleted A 2 and combined it with new clause A6</p> <p>2) facilitate an inclusive environment</p> <p>Experience</p> <p>A5 6) achieve safe and secure and inclusive environments</p>	Boroughs	To clarify policy meaning and structure and remove repetitive text.	Minor changes to wording, which has no consequences for the assessment.
ESC.3.5	D1 A 2 previously B1	<p>Form and layout</p> <p>B4 2) respond enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, are positioned and of a scale, appearance and shape, with due regard to that responds successfully to the identity and character of the locality, including to existing and emerging street</p>	Boroughs	Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.6	D1 A 6 previously A5	<p>Experience</p> <p>A5 6) achieve safe and secure and inclusive environments</p>	Boroughs	Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.7	D1 A 11 previously B6	<p>Experience</p> <p>B6 11) achieve indoor and outdoor environments that are comfortable and inviting for people to use environments both inside and outside buildings.</p>	Highgate Society	Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.8	D1 A 11 previously B4	<p>Quality and character</p> <p>B4 12) respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that make up contribute to the local character</p>	Boroughs, Natural England	Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.9	D1 A 14 Previously B3	<p>Quality and character</p> <p>B3 14) aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9)</p>	Environment Agency	Clarification	Minor changes to wording, which has no consequences for the assessment.

ESC.3.10	D1 Paragraph 3.1.1A	<p>□ 3.1.1A This Plan provides a policy framework for delivering Good Growth through good design. Policies D1 London’s form and characteristics and D2 Delivering good design work together to embed good design principles from the outset of the design process and ensure these are carried through to the completion of a development. Policy D1 sets out the key characteristics that should be delivered through the design of London’s buildings and spaces in terms of their form and layout, quality and character, and the user experience they provide. Throughout the period of assessment of planning applications, boroughs and applicants should cross reference between policies D1 and D2 to ensure these key design principles are addressed and carried through each stage of the planning and design process.</p>	Boroughs	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.11	D1 Paragraph 3.1.1	<p>□ 3.1.1.....This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services (see also Policy D6 Optimising housing density).</p>		Consistency	Minor changes to wording, which has no consequences for the assessment.
ESC.3.12	D1 Paragraph 3.1.2	<p><i>Paragraph 3.1.2 split into 3 paragraphs</i></p> <p>3.1.2 Developments that show a clear understanding of, and relationship with, the context of the site distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value.</p>	Boroughs, Natural England, Landscape Institute, L&Q, Barratt Dev. Countryside Properties Individuals	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.13	D1 Paragraph 3.2.1A	<p>3.1.2A As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place’s distinctive character, recognising that not all elements of a place are special and valued.</p>		Clarification	Additional supporting text, which has no consequences for the assessment.

ESC.3.14	D1 Paragraph 3.1.2B	<i>Existing paragraph 3.1.2 split</i> 3.1.2B Buildings should be of high quality and enhance, activate and appropriately frame the public realm.....		Readability	Minor change to layout, which has no consequence for the assessment.
ESC.3.15	D2 A1	A in preparing Development Plans and area-based strategies, which covers the following elements: 1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)		Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.16	D2 B	B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate forms of development for an area in terms of scale, height, density, layout and land uses...		Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.17	D2 C	C Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.	Historic England	Clarification	Minor changes to wording, which has no consequences for the assessment.
ESC.3.18	D2 F	Design scrutiny F The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in the policy, local evidence, and expert advice where appropriate. In addition b Boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning, urban design, and conservation officers' assessment and pre-application advice. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in part G , if they:	Boroughs, Historic England	Clarification	Reassessment required to ensure the importance of design scrutiny is assessed.
ESC.3.19	D2 F 1	Fif they:		Factual Update	Minor change to wording, which has no consequences for the assessment.

		1) are above the applicable density indicated in Part C of <u>Policy D6 Optimising housing density</u> ; or			
ESC.3.20	D2 H 1	H The design quality of development should be retained through to completion by: 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.21	D2 H 4	H The design quality of development should be retained through to completion by: 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor design quality of a development through to completion using architect retention clauses in legal agreements where appropriate.	Businesses Boroughs Agents	Clarification	Reassessment required to ensure the assessment considers that the architect retention clause is not mandatory.
ESC.3.22	D2 Paragraph 3.2.1	□ 3.2.1 Policy D1 London's form and characteristics and Policy D2 Delivering good design should be read together. It is intended that t The processes and actions set out in <u>Policy D2 Delivering good design</u> will help ensure development delivers good design as demonstrated by the principles and best practice outcomes set out in Policy D1.	Boroughs Businesses Community groups Agents	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.23	D2 Paragraph 3.2.2	3.2.2 ...help inform an understanding of an area's capacity for growth. Figure 3.2 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.		Clarification	Reassessment required to ensure the assessment incorporates historical development, as originally included in HC1.
ESC.3.24	D2 Paragraph 3.2.6	3.2.6 The Mayor's Design Advocates (MDAs) will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. MDAs are also panel members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor, where they have not previously	Boroughs Businesses Agents	Clarification	Additional supporting text, which has no consequences for the assessment.

		been subject to review, or for schemes of particular significance.			
ESC.3.25	D2 Paragraph 3.2.7	3.2.7 All development proposals should follow this guidance, and be subject to a level of scrutiny appropriate to the scale and/or impact of the project site . This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design officers and conservation officers. as well as formal design review Development proposals required to undergo design review as set out under Part F will form a small portion of overall planning applications in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.	Businesses Boroughs Agents Historic England	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.26	D2 Paragraph 3.2.7 A	3.2.7A The Mayor has published a London Quality Review Charter, with accompanying guidance. The Charter promotes a consistent approach across London’s design review sector, and promotes transparency of process. The Charter builds on the established guidance (from the Design Council Commission for Architecture and the Built Environment (CABE), Landscape Institute (LI), Royal Town Planning Institute (RTPI) and the Royal Institute of British Architects (RIBA)), which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available. The Charter Mayor has produced guidance on design reviews, includes ing guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor’s Good Growth by Design Programme, is developing a support offer to London’s boroughs and London’s review sector, for example, offering advice to boroughs wishing to put in place a design review function.	Businesses Boroughs Agents Historic England	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.27	D2 Paragraph 3.2.10	3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish ²⁴ . Consideration should be given to securing the design team’s ongoing involvement as a condition of planning permission, or as a design reviewer, or through an architect retention clause in a legal agreement. where this is not possible.	Businesses, Boroughs, Agents	Clarification	Reassessment required to ensure the assessment considers that the architect retention clause is not mandatory.

ESC.3.28	Figure 3.2	<i>Previously Figure 7.4 inserted after paragraph 3.2.10</i> Figure 3.2 Outline Character Map of London		Clarification	Reassessment required to ensure the assessment incorporates historical development, as originally included in HC1.
ESC.3.29	D3 A 1	A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they: 1) can be entered, and used and exited safely, easily and with dignity by all	The Access Association	Clarification and consistency with D11	Minor change to wording, which has no consequences for the assessment.
ESC.3.30	D3 A 3	A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they: 3) are designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a sufficiently sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.		Consistency with D11	Minor change to wording, which has no consequences for the assessment.
ESC.3.31	D3 Paragraph 3.3.1A	3.3.1A It is essential to consider inclusive design at the earliest possible stage in a scheme's development, and inclusive design should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the development. Master plans and design codes should therefore embed and document the highest standards of inclusive design, for this approach to be carried forward throughout the development of projects.	Rachael Marshall, Habinteg, Richard Lee, Central Ealing, Residents Association	Clarification	Reassessment required to ensure inclusive design during scheme development is assessed, particularly as part of the EqIA.
ESC.3.32	D3 Paragraph 3.3.2	3.3.2 Links to the wider neighbourhood for all pedestrians should be carefully considered, including networks of legible, logical, safe and navigable safe -pedestrian routes, dropped kerbs and crossing points with associated tactile paving.	LB Islington	Clarification and Consistency	Minor change to wording, which has no consequences for the assessment.

ESC.3.33	D3 Paragraph 3.3.2	3.3.2..... pedestrian routes, dropped kerbs and crossing points with associated tactile paving. Links into the neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving.	Boroughs The Access Association	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.3.34	D3 Paragraph 3.3.5	3.3.5 All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up mechanical devices or similar interventions that rely on manual handling are not considered to be appropriate, for reasons of user dignity and independence.	LB Hillingdon	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.35	D3 Paragraph 3.3.5	3.3.5 The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance. Associated with these, suitable levels of fire resistance should be achieved to the enclosures of fire evacuation lifts/ shafts, associated refuges and any lobbies. See also D11 Fire safety.		Clarification and consistency with D11	Minor change to wording, which has no consequences for the assessment.
ESC.3.36	D3 Paragraph 3.3.7	3.3.7 Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the original design concept. To demonstrate this, and to inform decision making, speed up the process and bring about better-quality development , an inclusive design statement is required as part of the Design and Access Statement.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.37	D3 Paragraph 3.3.7	3.3.7.....The inclusive design statement should: <ul style="list-style-type: none"> <input type="checkbox"/> • explain the design concept and illustrate how an inclusive design approach has been incorporated into this • detail what best practice standards and design guidance documents have been applied in terms of inclusive design <input type="checkbox"/> • show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed • highlight any historical contextual considerations <input type="checkbox"/> • set out how inclusion will be maintained and managed, including fire evacuation procedures <input type="checkbox"/> • detail how relevant best practice standards and design guidance have been applied, and highlight how relevant planning policy and legal requirements (including, where 	Police Crime Prevention Initiatives Limited Lift and escalator industry association	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.

		relevant, the Public Sector Equality Duty of the Equality Act 2010) have been responded to			
ESC.3.38	D3 Paragraph 3.3.7A	3.3.7A The planning of inclusive design elements of development proposals and the drafting of inclusive design statements should be undertaken by or have input from a suitably qualified specialist with relevant experience in inclusive design, such as a member of the National Register of Access Consultants. Local authority access officers or inclusive design advisors should assist in the evaluation of development proposals and inclusive design statements in terms of inclusive design.	IDaAP, NRAC, Withernay Projects, Centre for accessible environments, The Access Association, Martin McConaghy, Arup	Clarification	Reassessment required to ensure the use of inclusive design statements is assessed, particularly as part of the EqIA.
ESC.3.39	D3 Paragraph 3.3.8	3.3.8 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach in all development proposals by providing further guidance where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the following British Standards documents BS8300 Volumes 1 and 2: <ul style="list-style-type: none"> BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018. BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018. 	Barnet Society, Centre for Accessible Environments	Factual Update	Minor change to wording, which has no consequences for the assessment.
ESC.3.40	D4 A - G	<i>Clauses A-G re-order and some combined</i>		Clarification and Readability	Restructuring of policy text, which has no consequences for the assessment.
ESC.3.41	D4 A and B	<i>Clauses A and B combined</i> <p>A To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.</p> <p>A B Housing development New homes should be of high quality design, and provide have adequately-sized rooms (see Table 3.1), with comfortable and functional convenient and efficient room layouts, which are functional, fit for purpose and meet the changing needs of Londoners, without differentiating</p>	RB Kingston	Clarification	Restructuring of policy text, which has no consequences for the assessment.

		between tenures. over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.			
ESC.3.42	D4 B previously C	B C Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.	LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.43	D4 C previously E	C E Residential-Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of <u>Policy D1 London's form and characteristics</u> than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.	London Environment Directors' Network, Environmental Services Association, SUEZ Recycling and Recovery UK Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.44	D4 D	D <i>Moved. See below</i>	LB Tower Hamlets, LB Merton	Clarification	Restructuring, which has no consequences for the assessment.
ESC.3.45	D4 E	E Residential-Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.46	D4 G	G Dwellings-Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.	LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.47	D4 GA Previously D9 and D10	D-GA Housing developments are required to meet the minimum standards below. which these standards apply to all tenures and all residential accommodation that is self-contained. 9) A Where there are no higher local standards in the borough development plan documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each	Mr Colin Bannon, The Putney Society	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.</p> <p>10)The minimum depth and width for all balconies and other private external spaces should be 1.5m.</p>			
ESC.3.48	D4 Table 3.1	Table 3.1 - Minimum internal space standards for new dwellings	LB Waltham Forrest	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.49	D4 Table 3.1 Key	Key b: bedrooms p: persons	Mrs Tatiana Telles Ferreria	Correction	Minor change, which has no consequences for the assessment.
ESC.3.50	D4 Table 3.1 Key	* Where a studio / one single bedroom one person one bedspace (i.e. one single bedroom) dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm, as shown bracketed.	Mrs Tatiana Telles Ferreria	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.51	D4 Table 3.1 Key	GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA, provided that all aspects of the space standard have been met.	Mrs Tatiana Telles Ferreria	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.52	D4 Paragraph 3.4.2	3.4.2 The space standards are minimums which applicants are encouraged to exceed. However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an efficient use of land. The standards apply to all new self-contained dwellings of any tenure, and consideration should be given to the elements that enable a home to become a comfortable place of retreat. The provision of additional services and spaces as part of a housing development, such as building management and	Kessler's Stratford Limited, Blackheath Society, The Wimbledon Society, LB Bexley, LB Richmond upon Thames LB Enfield, Canary Wharf Group, London Assembly Planning Committee, GLA Conservative Group, The Kew Society, London Forum of	Clarification	Additional supporting text, which has no consequences for the assessment.

		communal amenity space, is not a justification for failing to deliver these minimum standards. Boroughs are, however, encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.	Amenity and Civic Societies, individuals		
ESC.3.53	D4 Paragraph 3.4.3	3.4.3 To address the impacts of the urban heat island effect and the fact that the majority of residential-housing developments in London are made up of flats, a minimum ceiling height of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space.		Consistency of terminology and clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.54	D4 Paragraphs 3.4.5A, 3.4.5B, 3.4.5C, 3.4.5D and 3.4.5E	<i>Reordering of paragraphs</i> 3.4.5A 3.4.10 3.4.5B 3.4.8 3.4.5C 3.4.9 3.4.5D 3.4.6 3.4.5E 3.4.7 3.4.8 Moved 3.4.9 Moved 3.4.10 Moved		Readability	Minor change to layout, which has no consequences for the IIA.
ESC.3.55	D4 3.4.5C	3.4.5C 3.4.9 Development should help create a more socially inclusive London. Gated forms of development that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design and inclusive design (see D3 Inclusive design).	The Access Association Timothy Gill Holly Jane Wier	Clarification and Consistency	Reassessment required to ensure inclusive design as part of good urban design practice is assessed, particularly within the EqIA.
ESC.3.56	D4 Paragraph 3.4.5D	3.4.5D 3.4.6 Private open-outside space should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared outside outside or shared amenity or garden space is encouraged.	London Food LInk/ Sustain	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.57	D4 Paragraph 3.4.5E	3.4.5E 3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the	Chiswick Protection Society	Clarification	Restructuring of policy text, which has no consequences for the assessment.

		<p>requirement should meet the requirements of <u>Policy S4 Play and informal recreation</u>.</p>			
<p>ESC.3.58</p>	<p>D4 Paragraph 3.4.11</p>	<p><i>Paragraph 3.4.11 deleted and replace with new table 3.2</i></p> <p>3.4.11—The following qualitative aspects should be addressed in the design of residential developments:</p> <ul style="list-style-type: none"> • the built form, massing and height of the development is appropriate for the surrounding context, and alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in D6.E), particularly where a proposal is above the applicable density indicated in part C of <u>Policy D6 Optimising housing density</u> • the urban layout, including spaces between and around buildings forms a coherent pattern of streets and blocks • public, communal and private open spaces relate well to each other and the wider neighbourhood • the layout of the scheme maximises the extent of active frontages onto public facing sides and, where appropriate, surrounds uses that have inactive frontages with uses that have active frontages to engender street-based activity and provide a sense of safety • the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose • communal open spaces provide sufficient space, are easily accessed from all related dwellings and are designed to support an appropriate balance of informal social activity and play opportunities for various age groups • the private amenity space for each dwelling is usable and has a balance of openness and protection, appropriate for its outlook and orientation • outdoor spaces are located to be appreciated from inside, and internal spaces are able to take advantage of good weather and designed to achieve ease of access to external spaces • blocks and floorplans are orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage • the dwellings and outside spaces are fit for purpose and comfortable 		<p>Clarification</p>	

		<ul style="list-style-type: none"> • the dwellings and outside spaces are able to be easily adapted to meet the changing and diverse needs of different occupiers over their lifetimes • window cleaning and other basic cleaning and maintenance activities can be carried out by residents easily • the site layout, common parts, design of individual units and buildings, and orientation of rooms and windows provide privacy and adequate daylight for all residents, as well as clear and convenient routes with a feeling of safety • the design or the layout and orientation helps reduce noise from common areas to individual dwellings • the design of developments, and orientation and layout of individual dwellings and common spaces helps meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters • sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items • recycling and waste disposal facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services²⁶. 			
ESC.3.59	D4 Table 3.2	<p><i>Insert new Table 3.2 – See Appendix</i></p> <p>Table 3.2 Qualitative design aspects to be addressed in housing developments</p>	Boroughs, London Waste and Recycling Board, Monks Orchard Residents Association, Mubin Trust for London	Clarification	Restructuring of policy text, which has no consequences for the assessment.
ESC.3.60	D5 A 1	<p>A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p> <p>1) at least 10 per cent of new-build dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users</p>	Age UK London, Alzheimer’s Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, Boroughs, IDaAP, The Access Association, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, Retirement Lifestyles Ltd., Liam Proudlock	Clarification	Additional supporting text, which has no consequences for the assessment.

ESC.3.61	D5 A 2	<p>A To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p> <p>2) all other new-build dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</p>	Age UK London, Alzheimer's Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, Boroughs, IDaAP, The Access Association		Additional supporting text, which has no consequences for the assessment.
ESC.3.62	D5 Paragraph 3.5.1 Footnote 27 and 27A	<p>3.5.1 Many households in London already require accessible or adapted housing to lead dignified and independent lives²⁷. In addition, More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, <u>Policy D5 Accessible housing</u> should apply to all new-build dwellings which are created via works to which Part M volume 1 of the Building Regulations applies^{27A}, which, at the time of publication of this Plan generally limits the application of this policy to new build dwellings.</p> <p><i>Amend footnote 27 and insert new footnote 27A</i></p> <p>²⁷ Source English Housing Survey</p> <p>^{27A} This is governed by the statutory instruments; No. 2214 Building and Buildings, England and Wales, and The Building Regulations 2010, and No. 767 Building and Buildings, England and Wales The Building Regulations &c. (Amendment) Regulations 2015</p>	Age UK London LB Ealing Alzheimer's Society Aspire Habinteg Hammersmith and Fulham Disability Forum LB Brent LB Haringey LB Barnet IDaAP The Access Association	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.63	D5 Paragraph 3.5.2	<p>3.5.2 to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas.</p> <p>For residential disabled persons parking requirements- see Policy T6.1 Residential parking.</p>	The Access Association	Clarification and Consistency	Additional supporting text, which has no consequences for the assessment.
ESC.3.64	D5 Paragraph 3.5.6	<p>3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and only in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy:</p> <ul style="list-style-type: none"> <input type="checkbox"/> • Specific small-scale infill developments (see <u>Policy H2 Small sites</u>) 	Just Space IDaAP Centre for Accessible Environments The Access Association Trust for London	Clarification	Minor change to wording, which has no consequences for the assessment.

		<ul style="list-style-type: none"> □ • Flats above existing shops or garages stacked maisonettes where the potential for decked access to the lift is restricted • Stacked maisonettes where the potential for decked access to lifts is restricted □ • Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive. 	Levitt Bernstein		
ESC.3.65	D5 Paragraph 3.5.8	<p>3.5.8Planning conditions should specify:</p> <ul style="list-style-type: none"> □ • Number of dwellings per size typology (i.e. x no. of y bed units) which required to meet M4(2) must comply with Part M4(2) □ • Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair accessible standards must comply with Part M4(3)(2)(a) wheelchair adaptable standards. □ • Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair adaptable standards must comply with Part M4(3)(2) wheelchair accessible standards. 	LB Camden Hammersmith and Fulham Disability Forum	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.66	D6 Title	<ul style="list-style-type: none"> • Policy D6 Optimising housing density • 	Levitt Bernstein The British Library	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.67	D6 A	<p>A Development proposals must make the most efficient use of land and be developed designed at the optimum density. The optimum density processes required by parts A and B of a development should result from Policy D2 Delivering good design set out how a design-led approach to determine will inform the evaluation of a site's context and help to identify its capacity of the site for growth. Particular consideration should be given to the following evaluation criteria to determine optimal development density:</p>	Levitt Bernstein	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.68	D6 A 1	<p>AParticular consideration should be given to the following evaluation criteria to determine optimal development density:</p> <ol style="list-style-type: none"> 1) the site context, including surrounding built form, uses and character; 	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond Multiple individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.3.69	D6 A 2 New footnote 28A	<p>AParticular consideration should be given to the following evaluation criteria to determine optimal development density:</p> <p>2) its the site's connectivity and accessibility by walking, and cycling, and existing and planned public transport to jobs and services (including both PTAL and access to local services^{28A});</p> <p><i>Insert new footnote 28A</i></p> <p>^{28A} Time Mapping (TIM) catchment analysis is available on TfL's WebCAT webpage and provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).</p>	HTA Design	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.70	D6 A 3	<p>AParticular consideration should be given to the following evaluation criteria to determine optimal development density:</p> <p>3) the capacity of surrounding infrastructure (see Part B)</p>	Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.71	D6 A (end paragraph)	<p><i>Moved to new clause EA</i></p> <p>AParticular consideration should be given to the following evaluation criteria to determine optimal development density:</p> <p>Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</p>	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond Multiple individuals	Clarification	Restructuring, which has no consequences for the assessment.
ESC.3.72	D6 B	<p>B In preparing Development Plans and area based strategies, boroughs should follow the approach set out in part A to determine the capacity of allocated sites. The capacity of</p>	Various public sector responses (Kingston & Surbiton Constituency Labour	Clarification	Minor change to wording, which has no consequences for the assessment.

		existing and planned physical, environmental and social infrastructure to support new development proposed by Development Plans should be assessed and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth.	Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)		
ESC.3.73	D6 B 2	<p>Band, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth.</p> <p>2) The ability to support proposed higher densities through encouraging increased levels of active travel should be taken into account.</p>	Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)	Clarification	
ESC.3.74	D6 B 3	<p>Band, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth.</p> <p>3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that if the development is contingent on the provision of the necessary new infrastructure, and including public transport services, and it will be appropriate that the development is phased accordingly.</p>	Numerous individuals (Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul Stansfield, Robert Gurd, Simon Saville) and campaign groups (The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group)	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.75	D6 B 3A	Band, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth.	Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB	Clarification	Additional supporting text, which has no consequences for the assessment.

		3A) When a proposed development exceeds the capacity identified in a local site allocation or the site is not allocated, and the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and CIL contribution that the development will make.	Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)		
ESC.3.76	Policy D6 C	C The higher the density of a development, the greater the level of scrutiny that is required of its design. For residential development it is particularly important to scrutinise the qualitative aspects of the development design described in <u>Policy D4 Housing quality and standards</u> , and the its proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of <u>Policy D2 Delivering good design</u> and those with a residential component must submit a management plan if the proposed density is above:	Levitt Bernstein The British Library	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.77	D6 D	D The following measurements of density should be provided for all planning applications that include new residential units:		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.3.78	D6 E	E The following additional measurements should be provided for all major planning applications:			
ESC.3.79	D6 E (end of Policy)	E ...should be provided for all major planning applications: ... These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond Multiple individuals	Clarification and consistency with A 1	Minor change to wording, which has no consequences for the assessment.
ESC.3.80	D6 EA	EA Proposed development that does not demonstrably optimise the density of the site in accordance with this policy should be refused.		Readability	Minor addition, which has no consequences for the assessment.
ESC.3.81	D6 Paragraph 3.6.1	3.6.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density .	Levitt Bernstein The British Library	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.82	D6 Paragraph 3.6.1A	<input type="checkbox"/> 3.6.1A A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth and the most	Friends of the Earth, Gravesham Borough Council, LB	Clarification	Additional supporting text, which has no consequences for the assessment.

		<p>appropriate development form, which are determined by following the process set out in <u>Policy D2 Delivering good design</u>, <u>Policy H1 Increasing housing supply</u>, <u>Policy H2 Small sites</u> and <u>Policy H3 Monitoring housing targets</u> set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved. Policy D1 London's form and characteristic and Policy D2 Delivering good design support the application of the design-led approach to optimising density. Policy D1 sets out design principles and physical characteristics that new development should deliver. Policy D2 parts A and B require the evaluation of the current characteristics of an area, including its infrastructure, and using this evaluation of evidence to establish what the most appropriate form of development is for an area in terms of scale, height, density, layout and land use, to create places which meet the requirements of Policy D1. The Mayor will provide further guidance on assessing site capacity and optimising density through a design led approach.</p>	<p>Hillingdon, LB Richmond Multiple individuals</p>		
ESC.3.83	D6 Paragraph 3.6.2	<p>3.6.2 Infrastructure assessments provision should be proportionate to the scale of the development. The locations and scale of growth will be identified through boroughs' Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs' infrastructure delivery plans or programmes.</p>	<p>Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)</p>	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.3.84	D6 Paragraph 3.6.2A	<p>3.6.2A If developments come forward with capacities in excess of those allocated in the relevant Development Plan, and therefore in excess of future planned infrastructure, a site-specific infrastructure assessment will be required. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.</p>	<p>Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers</p>	Clarification	Additional supporting text, which has no consequences for the assessment.

			Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)		
ESC.3.85	D6 Paragraph 3.6.3	3.6.3 The surrounding infrastructure of all types is a key element in determining the optimum density of a site. The capacity of existing and future public transport services , and the connections they provide, should be taken into consideration.....	Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)	Clarification and consistency .	Minor change to wording, which has no consequences for the assessment.
ESC.3.86	D6 Paragraph 3.6.3A	3.6.3A 3.6.2 Minor developments will typically have incremental impacts on local infrastructure capacity. The cumulative demands on infrastructure of minor development which should be addressed in boroughs infrastructure Delivery Plans or programme.	Various public sector responses (Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd)	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.87	D6 Paragraph 3.6.4	3.6.4 In many areas of London higher densities could be supported by maximising the potential of active travel. Those exceptional limited circumstances for which part B3 of the policy could apply include development being brought forward in areas where planned public transport schemes will significantly improve accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth Line, and the Bakerloo Line Extension	Numerous individuals (Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul Stansfield, Robert Gurd, Simon Saville) and campaign groups (The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.3.88	D6 Paragraph 3.6.7	3.6.7 The proposed design and management of the developments should be thoroughly scrutinised during the planning process. Residential portions should be scrutinised in line with part C of <u>Policy D6 Optimising housing density</u> . The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in <u>Policy D4 Housing quality and standards</u> help ensure that as densities increase, the quality of internal residential units is maintained.	Levitt Bernstein The British Library	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.89	D6 Paragraph 3.6.8	3.6.8 To ensure servicing and day to day management of residential developments have been considered in designing higher density development the Mmanagement plans required to be submitted with higher density development proposal by part C of this policy , must include details of day-to-day servicing and deliveries, and longer-term maintenance implications.	The Highbury Group	For clarity.	Minor change to wording, which has no consequences for the assessment.
ESC.3.90	D6 Paragraph 3.6.10	3.6.10 Density measures related to the residential population (part D of <u>Policy D6 Optimising housing density</u>) will be relevant for infrastructure provision, while measures of density related to the built form and massing (part E of <u>Policy D6 Optimising housing density</u>) will inform its integration with the surrounding context.	Levitt Bernstein The British Library	Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.3.91	D7 A - M	Development Plans and development proposals should: A E nsure the public realm is B M aximise the contribution that..... C B e based on an understanding of... D E nsure both the movement..... E E nsure there is a mutually F E nsure buildings are of G E nsure appropriate H I ncorporate green I E nsure that appropriate shade.... J E xplore opportunities for..... K C reate an engaging public.... L E nsure that any on-street..... M E nsure the provision and		Consistency	Minor change, which has no consequences for the assessment.
ESC.3.92	D7 A	A E nsure the public realm is well-designed , safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, and that it relates to the local	Boroughs Businesses Agents	Clarification and Readability	Minor change to wording, which has no consequences for the assessment.

		and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces materials should be of good quality, fit-for-purpose, durable and sustainable.			
ESC.3.93	D7 C	C In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.94	D7 D	D The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible.	Boroughs Businesses Campaign Group	Clarification	Reassessment required to ensure the accessibility of street crossings is considered, particularly in the EqlA.
ESC.3.95	D7 H	H h incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature manage heat and increase biodiversity.	RB Kingston	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.96	D7 I	I E ensure that appropriate shade, and shelter and seating are provided with appropriate types and amounts of seating to encourage people to spend time in a place ., where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter, including or street furniture that is poorly located, unsightly, in poor condition or without a clear function, to ensure that the function of the space and pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should normally be refused.	Boroughs Businesses Agents Professional Body	Clarification	Reassessment required to ensure the assessment, including the HIA, acknowledges the provision of shade and shelter within the public realm.
ESC.3.97	D7 J	J E explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets.	Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.98	D7 K	K C create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction activities during the daytime, evening and at night.	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.99	D7 L	L E ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway.	Boroughs Businesses	Clarification	Minor change to wording, which has no consequences for the assessment.

		Parking should not obstruct pedestrian lines. Pedestrian crossings should be regular, convenient and accessible.			
ESC.3.10 0	D7 M	M E ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm, including where new public realm is provided.	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 1	D7 Paragraph 3.7.1	3.7.1 The public realm includes all the publicly-accessible space...		Correction	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 2	D7 Paragraph 3.7.1	□ 3.7.1..... Some internal or elevated spaces can also be considered as part of the public realm, such as markets , shopping malls, sky gardens, viewing platforms, museums or station concourses...	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 3	D7 Paragraph 3.7.2	3.7.2...For this reason, the public realm, and the buildings that frame those spaces, should be designed for people , multi-functional , attractive, accessible and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement.	Levitt Bernstein	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 4	D7 Paragraph 3.7.3	3.7.3...The remaining streets are places which function as key centres for leisure, shopping, culture, social interaction and accessing services and employment, such as high streets or public squares.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 5	D7 Paragraph 3.7.4	3.7.4 The specific balance between the different functions of any one space, such as its place-based activities, and its function to facilitate movement and its ability to accommodate different uses of the kerbside , should be at the heart of how the space is designed and managed...	Centre for London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 6	D7 Paragraph 3.7.6	3.7.6 ...The opportunity to incorporate these uses should be identified and facilitated through community engagement , careful design and good acoustic design.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.10 7	D7 Paragraph 3.7.11	3.7.11 The provision of accessible free drinking water fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles...		Clarification	Reassessment required to ensure that the provision of accessible water is assessed, particularly within the EqIA.
ESC.3.10 8	D8 Introduction	Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:	Individuals Historic England London Assembly Planning Committee	Clarification and Consistency within Plan	Minor change, which has no consequences for the assessment.

<p>ESC.3.10 9</p>	<p>D8 A</p>	<p>Definition</p> <p>A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will may vary between and within different parts of London.</p>		<p>Clarification</p>	<p>Minor change to wording, which has no consequences for the assessment.</p>
<p>ESC.3.11 0</p>	<p>D8 B</p>	<p>Tall building lLocations</p> <p>B Tall buildings should only be developed in sustainable locations that are identified in Development Plans-part of a plan-led approach to changing or developing an area. By following the processes required in parts A, B and C of Policy D2 Delivering good design bBoroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Boroughs should identify any such locations on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate in these locations, taking account of:</p>	<p>Boroughs Businesses Historic England London Assembly Planning Committee</p>	<p>Clarification</p>	<p>Minor change to wording, which has no consequences for the assessment.</p>
<p>ESC.3.11 1</p>	<p>D8 B</p>	<p><i>Insert new paragraph under D8 B 3)</i></p> <p>B Tall buildings should only be developed in sustainable locations that are identified in Development Plans.....</p> <p>3) the public transport connectivity of different locations.</p> <p>This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p>	<p>LB Islington Historic England</p>	<p>Clarification</p>	<p>Minor change to wording, which has no consequences for the assessment.</p>
<p>ESC.3.11 2</p>	<p>D8 C 1 - 4</p>	<p>C The impacts of a tall building can be visual, functional or environmental.....</p> <p>1) Vvisual impacts</p> <p>a) Tthe views of</p> <p>i Llong-range views</p> <p>ii Mmid-range views</p> <p>iii Iimmediate views.....</p> <p>b) Whether part of a</p>		<p>Correction</p>	<p>Minor change, which has no consequences for the assessment.</p>

		<ul style="list-style-type: none"> c) Aarchitectural quality d) Proposals should take e) Buildings in the f) Buildings near the River..... g) Buildings should not <p>2) Functional impact</p> <ul style="list-style-type: none"> a) The internal and b) Buildings should c) Entrances, access routes, d) Lit must be demonstrated e) Infrastructure improvements f) Jobs, services, g) Buildings, including <p>3) Environmental impact</p> <ul style="list-style-type: none"> a) Wind, daylight, sunlight.... b) Air movement affected..... c) Noise created by air..... <p>4) Cumulative impacts</p> <ul style="list-style-type: none"> a) The cumulative visual..... 			
ESC.3.11 3	D8 C	<p>Impacts</p> <p>C The impacts of a tall building can be visual, functional or environmental. All the following impacts three elements should be considered-addressed within plan-making and in deciding-development proposals:</p>	Historic Royal Palaces London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.11 4	D8 C 1 a)	<p>Impacts</p> <p>Cshould be considered-addressed within plan-making and in deciding-development proposals:</p> <ul style="list-style-type: none"> 1) Vvisual impacts a) The views of buildings from different distances: need to be considered, including 			Minor change to wording, which has no consequences for the assessment.
ESC.3.11 5	D8 C 1 e	<p>Impacts</p> <p>Cshould be considered-addressed within plan-making and in deciding-development proposals:</p> <ul style="list-style-type: none"> 1) Vvisual impacts 	Historic Royal Palaces Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.

		e) Buildings in the setting of a World Heritage Site must preserve, and not harm , the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it			
ESC.3.11 6	D8 C 1 f	<p>Impacts</p> <p>Cshould be considered-addressed within plan-making and in deciding development proposals:</p> <p>1) Vvisual impacts</p> <p>f) Buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river</p>	Historic England London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.11 7	D8 C 2 e	<p>Cshould be considered-addressed within plan-making and in deciding development proposals:</p> <p>2) Ffunctional impact</p> <p>e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately (see also Policy D6 Optimising density)</p>	The Putney Society	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.11 8	D8 D	D Free to enter P publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.11 9	D8 Paragraph 3.8.1	<p><input type="checkbox"/> 3.8.1 Whilst high density does not need to imply high rise, tall buildings can form part of a strategic-plan-led approach to facilitating regeneration opportunities and meeting managing future growth, regeneration and economic development goals, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.</p>	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 0	D8 Paragraph 3.8.1	<p><input type="checkbox"/> 3.8.1Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. impacts if in inappropriate locations and/or of poor quality design. The processes set out in <u>Policy D2 Delivering good design</u> will enable boroughs to identify locations-areas where tall buildings can play a positive role in shaping the character of an area.</p>	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.3.12 1	D8 Paragraph 3.8.2	<p>3.8.2 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a ‘tall building’ for specific localities. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a definitions of tall buildings should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London. For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:</p> <ul style="list-style-type: none"> <input type="checkbox"/> • Located within the Thames Policy Area and over 25m in height; or it falls within the Thames Policy Area and is more than 25m in height <input type="checkbox"/> • Located anywhere it falls anywhere else within the City of London and is more than 150m in height <input type="checkbox"/> • Located elsewhere in London and over it is more than 30m in height elsewhere in London. 	Individuals Businesses Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 2	D8 3.8.2A	<ul style="list-style-type: none"> <input type="checkbox"/> 3.8.2A The higher the building the greater the level of scrutiny that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design. 	Boroughs Businesses Historic England	Clarification	Minor addition, which has no consequences for the assessment.
ESC.3.12 3	D8 Paragraph 3.8.7	<p>3.8.7 Any external lighting for tall buildings should be energy efficient, and designed to minimise glare, light trespass, and sky glow, and ensure it does not negatively impact on protected views or the amenity of nearby residents.</p>	London Forum of Amenity Society Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 4	D9 A	<p>A Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development beneath existing buildings.</p>	Community groups	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 5	D9 Paragraphs 3.9.2 and 3.9.3	<p><i>3.9.2 moved to end of section</i> <i>3.9.3 moved to end of section</i></p>		Readability	Restructuring, which has no consequences for the assessment.
ESC.3.12 6	D9 Paragraph 3.9.4	<p>3.9.4 The construction of basements can, however, cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments....</p>		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.3.12 7	D9 Paragraph 3.9.5	3.9.5 The Mayor supports boroughs in restricting large-scale basement excavations under existing properties where this type of development is likely to cause unacceptable harm. Local authorities are advised to consider the following issues, including any cumulative impacts , alongside other relevant local circumstances when developing their own policies for basement developments:	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 8	D9 Paragraph 3.9.5A	3.9.5A-3.9.2 Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable. Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.	Community groups	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.12 9	D9 Paragraph 3.9.5B	3.9.5B-3.9.3 The Mayor considers that smaller-scale basement excavations , where they are appropriately designed and constructed, can contribute to the efficient use of land, and They can provide an affordable option for families to provide extra living space without the costs of moving house, although these developments rarely result in the provision of additional residential units to help meet London's housing need. In areas w Where basement developments could cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.	LB Hammersmith and Fulham Levitt Bernstein	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 0	D10 A	A Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime.	Metropolitan Police Service	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 1	D10 Paragraph 3.10.2	3.10.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management. The London Fire and Emergency Planning Authority (LFEPA) London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety		Update	Minor change to wording, which has no consequences for the assessment.

		solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.			
ESC.3.13 2	D10 Paragraph 3.10.3 New footnote 30A	<p>3.10.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme^{30A} published by the Police. Further guidance is provided by Government on security design³¹. This will ensure development proposals they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p><i>Insert new footnote 30A</i></p> <p>For further details see http://www.securedbydesign.com</p>	Metropolitan Police Service	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 3	D10 Paragraph 3.10.4	<p>3.10.4 By drawing upon current Counter Terrorism principles, Nnew development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection detecting intrusion, and delay/disrupt their activity until an appropriate response can be deployed any attempts at disruption until a response can be activated. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate respond to the potential level of risk whilst ensuring the quality of places is maximised.</p>	Metropolitan Police Service	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 4	D11 A 1A	<p>A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p> <p>1A) identify suitably positioned unobstructed outside space:</p> <p>a) for fire appliances to be positioned on</p> <p>b) appropriate for use as an evacuation assembly point</p>	London Fire and Emergency Planning Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 5	D11 A 1	<p>A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p>	'and serious injury' due to respondent No. 1897 Peter Eversden	Clarification	Minor change to wording, which has no consequences for the assessment.

		1) are designed to incorporate appropriate features which reduce the risk to life and of serious injury in the event of a fire; including appropriate fire alarm systems, passive and active fire safety measures			
ESC.3.13 6	D11 A 3	A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they: 3) provide suitable and convenient means of escape, and associated evacuation strategy for all building users			Minor change to wording, which has no consequences for the assessment.
ESC.3.13 7	Policy D11 A 5) (previously 4)	A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they: 4) adopt develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in	Peter Eversden Green Party Group London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 8	D11 B 1	B The statement should detail how the development proposal will function in terms of: 1) the building's construction: methods, products and materials used, including manufacturers details	Mr Peter Eversden Mr Christopher Barlow	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.13 9	D11 B 2	B The statement should detail how the development proposal will function in terms of: 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and the associated management plan approach and associated evacuation strategy approach	Mr Peter Eversden	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.14 0	D11 B 2A	B The statement should detail how the development proposal will function in terms of: 2A) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans	Mr Peter Eversden	Clarification and consistency with B 2	
ESC.3.14 1	D11 B 4	B The statement should detail how the development proposal will function in terms of:	London Fire and Emergency Planning Authority	Clarification	Minor change to wording, which has no consequences for the assessment.

		4) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building			
ESC.3.14 2	D11 B 4A	B The statement should detail how the development proposal will function in terms of: 4A) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.	London Forum of Amenity and Civic Societies Green Party Group Mr Peter Eversden	Clarification	Minor addition, which has no consequences for the assessment.
ESC.3.14 3	D11 Paragraph 3.11.2	3.11.2 The subject matter of fire safety compliance is covered by Part B of the Building Regulations. However to ensure that development proposals achieve the highest standards of fire safety , reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole. Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety.	Gary Ferrand	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.14 4	D11 Paragraph 3.11.2A	3.11.2A Applicants should demonstrate on a site plan that space has been identified for the appropriate positioning of fire appliances. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.	London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	Clarification	Minor addition, which has no consequences for the assessment.

ESC.3.14 5	D11 Paragraph 3.11.2B	3.11.2B Applicants should also show on a site plan appropriate evacuation assembly points. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.	London Fire and Emergency Planning Authority , Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT, London Councils RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	Clarification	Minor addition, which has no consequences for the assessment.
ESC.3.14 6	D11 Paragraph 3.11.2C	3.11.2C Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.	London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT, London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	Clarification and typing error corrected	Minor addition, which has no consequences for the assessment.
ESC.3.14 7	D11 Paragraph 3.11.3A	3.11.3A The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.	Gary Ferrand Clarion Housing Group LB Harrow	Clarification	Minor addition, which has no consequences for the assessment.

ESC.3.14 8	D11 Paragraph 3.11.4	3.11.4 <u>Policy D3 Inclusive design</u> requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. Where In all developments where lifts are installed, <u>Policy D3 Inclusive design</u> requires as a minimum of at least one lift per core (or more subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. , which incorporate suitable levels of fire resistance to elements of construction forming refuges, evacuation lift enclosures, and lobbies. Fire evacuation lifts and associated provisions should be appropriately designed, constructed and should include the necessary controls suitable for the purposes intended.	The Access Association	Consistency with wording of D3	Minor change to wording, which has no consequences for the assessment.
ESC.3.14 9	D11 Paragraph 3.11.5	3.11.5 Fire statements should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers or suitably qualified and competent with the demonstrable experience to address the complexity of the design being proposed / built, which should be evidenced in the fire statement. Planning departments should could work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements.	LB Greenwich LB Hackney The Access Association Mr Christopher Barlow	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 0	D11 Paragraph 3.11.5A	3.11.5A Security measures should not adversely impact on the means of escape nor prevent entry of the fire and rescue service.	Metropolitan police service	Clarification	Minor addition, which has no consequences for the assessment.
ESC.3.15 1	D12 A	A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance- generating activities or uses on the proposed new noise-sensitive development.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 2	D12 B	B Boroughs should ensure that development Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change.....	Home Builders Federation	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.3.15 3	D12 B	B principle and take account of existing noise and other nuisance -generating uses in a sensitive manner when new development, particularly residential , is proposed nearby.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 4	D12 C	<i>C moved</i>		Readability	Restructuring of Plan, which has no consequences for the assessment.
ESC.3.15 5	D12 D	D Development should be designed to ensure that established noise and other nuisance -generating venues uses remain viable and can continue or grow without unreasonable restrictions being placed on them.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 6	D12 E	E New noise and other nuisance -generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development uses should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 7	D12 EA 1 (previously C1)	<i>Previous Part C 1</i> C EA Development proposals should manage noise and other potential nuisances by: 1) ensuring good acoustic design to mitigate s and minimise s existing and potential nuisances impacts of noise generated by existing uses and activities located in the area	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.15 8	D12 EA 2	<i>Previous Part C 2</i> C EA Development proposals should manage noise and other potential nuisances by:	Freight and Transport Association, Tarmac, Cemtex UK, UK Warehousing Association, London Riverside BID, London Councils,	Clarification	Minor change to wording, which has no consequences for the assessment.

		2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.	Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water		
ESC.3.15 9	D12 EA 3	<i>Previous Part C 3</i> C EA Development proposals should manage noise and other potential nuisances by: 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures.	London Councils, Environment Agency, boroughs, London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 0	D12 F	F Boroughs should refuse development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 1	D12 Paragraph 3.12.1	<input type="checkbox"/> 3.12.1 For a long time, the responsibility for managing and mitigating the impact of noise and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise or other nuisance , regardless of how long the noise-generating business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise and other nuisances from existing businesses or activities , sometimes forcing the businesses or other activities to close down .	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, boroughs, London Assembly Planning Committee, Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 2	D12 Paragraph 3.12.2	3.12.2 The Agent of Change principle places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example , applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly	Clarification	Minor change to wording, which has no consequences for the assessment.

		noise and other impacts. This could include paying for soundproofing for the existing noise-generating-uses , such as an existing -music venue. The Agent of Change principle works both ways. For example, if a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.	Planning Committee, Thames Water		
ESC.3.16 3	D12 Paragraph 3.12.3 Footnote 32	3.12.3 The Agent of Change principle is included in the National Planning Policy Framework at paragraph 123 and Planning Practice Guidance provides further information on how to mitigate the adverse impacts of noise and other impacts such as air and light pollution ³² . <i>Amend footnote 32</i> ³² NPPG, https://www.gov.uk/guidance/noise-2#contents https://www.gov.uk/topic/planning-development/planning-officer-guidance		Update	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 4	D12 Paragraph 3.12.4	3.12.4 Noise-generating cultural venues such as theatres, concert halls, pubs, night-clubs and live music other venues that host live or electronic music should be protected (see Policy HC5 Supporting London's culture and creative industries).	Association of Licensed Multiple Retailers, Individual	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 5	D12 Paragraph 3.12.4A	3.12.4A As well as cultural venues, the Agent of Change principle should be applied to all noise-generating uses and activities including schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	Clarification	Minor addition, which has no consequences for the assessment.
ESC.3.16 6	D12 Paragraph 3.12.5	3.12.5 Housing and other noise-sensitive development proposed near to an existing noise-generating use should include necessary acoustic design measures for example, site layout, building orientation, uses and materials . This will ensure new development has effective sound insulation measures in place to mitigate and minimise potential noise impacts or neighbour amenity issues.	Day Group Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.16 7	D12	3.12.5A On-going and longer-term management of mitigation measures should be considered, for example through a	Freight and Transport Association, UK	Clarification and Consistency with T7	Minor addition, which has no consequences for the assessment.

	Paragraph 3.12.5A	noise servicing management plan. Policy T7 Freight and servicing provides guidance on managing the impacts of freight, servicing and deliveries.	Warehousing Association, London Industrial and Logistics Sounding Board, London Riverside BID Theatres Trust, LB Islington		
ESC.3.168	D12 Paragraph 3.12.6A	3.12.6A The Agent of Change principle predominantly considers the impacts of noise-generating uses and activities but other nuisances should be considered under this policy. Other nuisances include dust, odour, light and vibrations should also be considered (see Policy SI1 Improving air quality and T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Policy E7 Intensification, co-location and substitution, part E (4)). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	Clarification and consistency with rest of the Plan	Minor addition, which has no consequences for the assessment.
ESC.3.169	D12 paragraph 3.12.7	3.12.7 Noise and other impact assessments accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the noise particular characteristics of existing uses can be properly captured and assessed. For example, cultural venues some businesses and activities can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in noise impact assessments to ensure a full and accurate assessment.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.170	D12 paragraph 3.12.8	3.12.8 Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale and Policy SI1 Improving air quality which considers the impacts of existing air pollution. Further guidance on managing and mitigating noise in mixed-use development and town-centre development is also provided in the Mayor's London Environment Strategy.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency	Clarification and consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.3.171	D13 A 2	A and other non-aviation development proposals should manage noise by:		Clarification	Minor change to wording, which has no consequences for the assessment.

		2) reflecting the Agent of Change principle as set out in Policy D12. to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses			
ESC.3.17 2	D13 A 3	Aand other non-aviation development proposals should manage noise by: 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise generating uses-development	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.17 3	D13 A 5	A and other non-aviation development proposals should manage noise by: 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial uses) through the use of distance, screening, or internal layout, orientation, uses or materials – in preference to sole reliance on sound insulation.	Day Group Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.17 4	D13 Paragraph 3.13.1	3.13.1Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive species. Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.17 5	D13 Paragraph 3.13.2	3.13.2.....Through the application of this principle existing land uses should not be unduly impacted affected by the introduction of new noise-sensitive uses. For noise-generating uses regard should be had to not prejudicing their potential for intensification or expansion.	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.3.17 6	D13 Paragraph 3.13.3	3.13.3 The management of noise also includes promoting good acoustic design of the inside of buildings . Section 5 of BS 8223:2014 provides guidance on how best to achieve this. The Institute of Acoustics has produced advice Pro:PG Planning and Noise (May 2017) that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.	Hoare Lea LLP Chartered Institute of Building Services Engineers	Clarification	Minor change to wording, which has no consequences for the assessment.

Chapter 4 Housing					
ESC.4.1	H1 B 2 a	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station^{34A}, rail station or town centre boundary³⁵</p> <ul style="list-style-type: none"> • ^{34A} Tube, rail, DLR and tram stations <p>³⁵ District, major, metropolitan and international town centres – for the purposes of Policy H1B2a, the 800m distance is measured from the edge of the town centre boundary</p>	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.2	H1 B 2 b	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets</p>	Tesco	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.3	H1 B 2 e	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>e) small housing sites (see <u>Policy H2 Small sites and small housing developments</u>)</p>		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.4.4	H1 B 2 f	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>f) industrial sites that have been identified through the processes set out in <u>Policy E4 Land for industry, logistics and services to support London's economic function</u>, <u>Policy E5 Strategic Industrial Locations (SIL)</u>, <u>Policy E6 Locally Significant Industrial Sites</u> and <u>Policy E7 Industrial intensification, co-location and substitution</u>, of land for industry, logistics and services to support London's economic function</p>		Consistency	Minor change to wording, which has no consequences for the assessment.

ESC.4.5	H1 Paragraph 4.1.8	4.1.8...Boroughs are encouraged to should identify as many sites, including small sites, as possible via their Development Plan documents and brownfield registers .	HBF	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.4.6	H1 Paragraph 4.1.8	4.1.8...This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect the step change that can be expected in housing delivery through the presumption in favour of small housing developments (<u>Policy H2 Small sites and small housing developments</u>) and the package of measures outlined in the London Housing Strategy.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.4.7	H1 Paragraph 4.1.8A	4.1.8A If a target is needed beyond the 10 year period (2019/20 to 2028/29) boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041), in consultation with the GLA and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites.	Authorities outside London, HBF, other private sector stakeholders	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.8	H2	<u>Policy H2 Small sites and small housing developments</u>		Clarification	Minor change, which has no consequences for the assessment.
ESC.4.9	H2 A	A Small sites (below 0.25 hectares in size) should play a much greater role in housing delivery to achieve the ten-year housing targets set out in <u>Policy H1 Increasing housing supply</u> . and B Boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.10	H2 A 5	5) achieve the targets for small sites set out in Table 4.2.		Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.11	H2 B 2 a	B Boroughs should: 2) prepare area-wide design codes for small housing developments between 1 to 25 homes to: a) promote good design and to proactively encourage increased housing provision, good design and higher residential densities	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.12	H2 B 2 b	B Boroughs should: 2) prepare area-wide design codes for small housing developments between 1 to 25 homes to: b) cover the spatial locations set out in part D2 (excluding the exempted areas listed in part F)	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.13	H2 B 2 c	B Boroughs should....	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>2) prepare area-wide design codes for small housing developments between 1 to 25 homes to:</p> <p>c) on small housing developments. Design codes should provide clear guidelines and parameters for the range of small-scale housing developments listed in part D2, as a minimum, to provide certainty and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.</p>			
ESC.4.1 4	H2 C	<p>C Boroughs should increase planning certainty on small sites by:</p> <ol style="list-style-type: none"> 1) identifying and allocating appropriate small sites for residential development 2) listing these sites on their brownfield registers 3) granting permission in principle on specific sites or preparing local development orders. <p><i>Add sub-heading</i></p> <p>The presumption in favour of small housing developments between 1 and 25 homes</p>	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 5	H2 D 1	<p>D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:</p> <ol style="list-style-type: none"> 1) infill development on vacant or underused brownfield sites 	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 6	H2 D 2	<p>D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:</p> <ol style="list-style-type: none"> 2) proposals to increase the density of existing residential houses uses within PTALs 3-6 or within 800m of a Tube station^{37A}, rail station or town centre boundary^{37B} through: <ol style="list-style-type: none"> a) residential conversions (subdivision of houses into flats) b) residential extensions (upward, rear and side) c) the demolition and/or redevelopment of existing buildings houses and/or ancillary buildings d) infill development within the curtilage of a house^{37C} <ul style="list-style-type: none"> • ^{37A} Tube, rail, DLR or tram station • ^{37B} District, major, metropolitan and international town centres – for the purposes of Policy H2D2, the 800m distance is 	London Boroughs, Developers	Readability and clarification	Minor change to wording, which has no consequences for the assessment.

		<p>measured from the edge of the town centre boundary</p> <ul style="list-style-type: none"> ^{37C} Subject to the total area of ground covered by buildings within the curtilage of the dwelling house not exceeding 50% of the total area of the curtilage (excluding the ground area of the original dwelling house), to be consistent with the Government's permitted development rights for a household set out in Part 1 of Schedule 2 of Town and Country Planning (General Permitted Development) (England) Order 2015). 			
ESC.4.1 7	H2 D 3	<p>D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:</p> <p>3) the redevelopment or upward extension of flats, and non-residential buildings and residential garages to provide additional housing.</p>	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 8	H2 E	<p>E For the purposes of part D, the presumption in favour of small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision; or where development does not comply with a design code prepared in accordance with part B.</p>	London Boroughs, Historic England, MHCLG, community groups, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 9	H2 F	<p>F The presumption in favour of small housing developments should not be applied to:</p> <ol style="list-style-type: none"> statutory listed buildings designated heritage assets and their settings^{37D} -(however, a presumption in favour of residential conversions should be applied in conservation areas) developments providing more than 25 homes proposals that do not provide net additional housing sites of more than 0.25 hectares in size non-self-contained housing schemes (i.e. that are not in Class C3 residential use) mixed-use proposals within sites that contribute to the strategic functions of the Central Activities Zone (CAZ) 	London Boroughs, Historic England, MHCLG, community groups, individuals	<p>Factual update to include exemptions for designated heritage assets and their settings – to reflect statutory duties of LPAs, legislative requirements and national policy.</p> <p>Clarification</p>	Minor change to wording, which has no consequences for the assessment.

		<p>7) estate regeneration schemes. designated industrial or employment sites</p> <p>8) change of use of non-residential buildings to residential use^{37E}</p> <p>9) designated Green Belt, MOL, Sites of Importance for Nature Conservation (SINCs)^{37F} and other protected public open spaces</p> <p>10) buildings that would be more than 30 metres high (following their redevelopment or extension)</p> <p>11) development that involves the alteration or replacement of existing homes on social housing estates.</p> <p>^{37D} See glossary for definitions of ‘designated heritage assets’ and ‘setting of heritage assets’</p> <p>^{37E} See paragraph 4.2.3A</p> <p>^{37F} See definition in paragraph 8.6.1</p>			
ESC.4.2 0	H2 G	<p>G Homes located on the ground floor on minor developments should meet the requirements of Policy D5 Accessible Housing; New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for ‘accessible and adaptable dwellings’ and provide step-free access. New build homes on these sized sites homes that are not on the ground floor on minor developments do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.</p>	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.2 1	H2 H	<p>H <u>Policy H6 Threshold approach to applications must be applied to small sites which are major developments and trigger affordable housing requirements.</u> Boroughs wishing to apply affordable housing requirements to minor developments sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions and. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development in these instances.</p>	London Boroughs, community groups, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.2 2	H2 I	<p>HA To benefit from the presumption, small housing developments must:</p>	London Boroughs, community groups, individuals	Clarification	Reassessment required to ensure new standards, such as cycle parking and air quality, are assessed within the IIA, particularly in the SEA and HIA.

		<p>a) meet the minimum standards for private internal space and private outside space set out in <u>Policy D4 Housing quality and standards</u></p> <p>b) meet minimum cycle parking standards</p> <p>c) not exceed maximum residential parking standards</p> <p>d) accord with Agent of Change principles and <u>Policy HC7 Protecting public houses</u></p> <p>e) where they are classified as major developments, meet the Air Quality Neutral benchmark^{37G} for building emissions, by using ultra-low NOx boilers or other less polluting technologies^{37H}.</p> <p>^{37G} Air Quality Neutral benchmarks are set out in <u>Policy SI1 Improving air quality</u> and accompanying GLA guidance</p> <p>^{37H} Less polluting technologies could include heat pumps, connection to an existing district heating scheme, fuel cells or renewables.</p>			
ESC.4.2 3	H2 J	HB To benefit from the presumption in Part E, minor developments should achieve no net loss of overall green cover and major developments should contribute to urban greening in line with <u>Policy G5 Urban greening</u> and the Urban Greening Factor.	London Boroughs, community groups, individuals	Clarification	Reassessment required to ensure the protection of green cover and contribution to urban greening in small sites is assessed within the IIA.
ESC.4.2 4	H2 K	HC Small housing developments that demonstrably fail to optimise potential housing delivery on a site, or prejudice the more comprehensive development of a site allocation, should not benefit from the presumption in favour of development, unless there is a clear justification. Small developments should be designed to facilitate adjacent sites to come forward in the future.	London Boroughs	Clarification	Reassessment required to ensure the IIA assesses the requirement to ensure small sites optimise housing delivery, and do not result in the fragmentation of large sites.
ESC.4.2 5	H2 4.2.1	4.2.1 For London to meet its housing needs, small housing developments small sites below 0.25 hectares in size of between one and 25 homes must make a substantially greater contribution to new supply across the city...	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.2 6	H2 4.2.3	4.2.3 The one to 25-unit threshold set out in <u>Policy H2 Small sites</u> which triggers the application of this policy the presumption in favour of small housing development is considered to be representative of small housing developments across London and for this reason differs from that used in Planning Practice Guidance ⁵³ and the definition of 'major development' in planning legislation ⁵⁴ .		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.2 7	H2 4.2.3A	4.2.3A The presumption in favour of small housing developments does not apply to change of use of non-residential floor space to residential use (where this does not involve redevelopment); however, it does apply to the redevelopment of non-residential buildings, subject to relevant exemptions listed in Policy H2F. This distinction aims to incentivise the most optimal form of potential development.	London Boroughs, Developers	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.2 8	H2 4.2.3B	4.2.3B When assessing the benefits of additional housing provision (Policy H2E), boroughs should recognise that schemes which provide relatively low numbers of new homes play an important cumulative role in helping to meet housing supply targets alongside larger developments, subject to the scheme in question making the most efficient use of land.		Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.2 9	H2 4.2.4	4.2.4 The small sites targets in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size, a category that is likely to include the vast majority of one to 25-unit developments. Hence, the small sites targets include housing capacity from small sites below this size threshold which deliver more than 25 homes. The targets...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.3 0	H2 4.2.5	4.2.5 Incremental intensification of existing residential areas within PTALs 3-6 or and within 800m of a Tube ^{40A} station ^{40B} or town centre boundary ^{40B} is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision, subject to the location of heritage assets and their settings. Outside the exempted Within these areas (Policy H2F), there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, in these locations the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs. ^{40A} Tube, rail, DLR or tram station <ul style="list-style-type: none">^{40B} District, major, metropolitan and international town centres	Historic England	Factual update to exempt designated heritage assets.	Minor change to wording, which has no consequences for the assessment.

ESC.4.3 1	H2 4.2.6	4.2.6 The Mayor will set out design principles for small housing developments across London as part of his review of GLA design guidance, which boroughs should draw on and supplement when preparing design codes. Design codes can be combined with local development orders, where appropriate. As a key purpose of design codes is to provide clarity and certainty for potential applicants, boroughs should support design proposals which accord with any published design code.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.3 2	H2 4.2.7	4.2.7 Boroughs are encouraged to explore opportunities for small housing developments in conservation areas where these will complement and enhance the area. As not all elements of a conservation area will necessarily contribute to its significance there is the potential for well-designed new housing to make a positive contribution to the special character of conservation areas. This also applies to small sites in the setting of other heritage assets such as listed buildings. Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.	Historic England	Clarification	Reassessment required to ensure the potential benefits small sites can have on conservation areas and other heritage assets are assessed in the IIA.
ESC.4.3 3	H2 4.2.7A	4.2.7A Specialist housing for older people that is in Class C3 use can benefit from the presumption in favour of small sites, where the requirements of Policies H2D to H2K are met.	McCarthy and Stone and other specialist housing providers	Clarification	Reassessment required to ensure that sheltered housing for older people within small sites is assessed in the IIA, particularly within the EqIA and HIA.
ESC.4.3 4	H2 4.2.8	4.2.8 ... Environmental and architectural innovation should be supported and schemes should achieve good design and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. All homes must meet the housing standards in <u>Policy D4 Housing quality and standards</u>, including the provision of private open space.	London Boroughs, community groups, individuals.	Readability	Restructuring of Policy text, which has no consequences for the assessment.
ESC.4.3 5	H2 4.2.8A	4.2.8A In view of the objectives of this policy, boroughs should promote well-designed small housing developments which respond positively to local character and the opportunity to accommodate additional housing on a particular site and should not refuse applications because of a conflict with local policies where these policies are inconsistent with Policy H2 and pre-date the publication of the London Plan.	London Boroughs, Developers	Clarification	Reassessment required to ensure the requirements for well-designed homes which respect local character is assessed within the IIA.
ESC.4.3 6	H2 4.2.8B	4.2.8B Where existing houses are redeveloped or subdivided, boroughs may require the provision of family sized units (3 bed + units) providing sufficient design flexibility is	London Boroughs	Clarification	Reassessment required to ensure the IIA, particularly the EqIA and HIA, assesses the provision

		provided to allow the existing footprint of a house to be enlarged in order to meet this requirement.			of family sized homes during redevelopment, where required.
ESC.4.3 7	H2 4.2.9	4.2.9 Impacts on Loss of existing biodiversity or green space , as a result of small housing developments, should be minimised and mitigated through measures such as returning hard standing to green space , the installation of green roofs, green walls , the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. The principle of no net loss can be met through off-site provision where site constraints mean that it cannot be achieved on site. Any off-site provision must be secured robustly, for example through a cash in lieu payment to the borough to contribute towards localised urban greening projects which provide net additional green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates where possible.	London Boroughs	Clarification	Reassessment required to ensure the no net loss through off-site provision is appropriately considered in the IIA.
ESC.4.3 8	H2 Figure 4.3	Figure 4.3 - Proximity to town centres and stations <i>Amend title of key:</i> Proximity to town centres and stations Amend key: 800m distance to a London Underground Station or Rail Station	Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.3 9	H2 4.2.13	4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), contributions on minor developments sites delivering ten or fewer units should be asked for as a cash in lieu contribution . Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs. Further guidance on the potential application of the threshold approach (Policy H6) for small sites of 25 units and fewer is provided in <u>Policy H6 Threshold approach to applications</u>.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 0	H3 A	A The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost through demolition, amalgamations^{41A} or change of use ^{41B} . ^{41A} Amalgamating flats into larger homes ^{41B} For example, a scheme involving 25 gross new homes and the loss of 10 existing homes would contribute 15 net additional homes towards meeting housing targets	LB Camden Community groups Association of Consultancy & Engineering	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.4 1	H3 BA	BA The small sites targets are a component of, and not additional to, the overall housing targets. The relative contribution from large and small sites may fluctuate across the target period, providing the overall 10 year targets are met in a way that is consistent with the policies in the Plan.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 2	H3 C	C Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms/ units being counted as a single home.		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 3	H3 Paragraph 4.3.3A	4.3.3A The approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up ⁴² . The rationale for this approach is explained in more detail in paragraphs 7.19 to 7.29 of the 2017 SHLAA report. ⁴² For more detail on this see the 2017 SHLAA report.	Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 4	H4	<ul style="list-style-type: none"> Policy H4 Meanwhile use as housing 	Natural England, Federation of Small Businesses, LB Bexley, RB Greenwich, LB Southwark, LB Merton, The British Library, London NHS Clinical Commissioning Group, London Waste and Recycling Board (LWARB)	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 5	H4 4.4.1	4.4.1 ...Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site for housing does not change the established land use of the site, and this should be made clear in the temporary planning permission.	Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 6	H4 4.4.1	4.4.1 ... However, meanwhile housing should count towards meeting a borough's housing target.	LB Bromley and LB Sutton	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.4 7	H4 4.4.1A	4.4.1A The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.		Readability	Minor change, which has no consequences for the assessment.

ESC.4.4 8	H4 Paragraph 4.4.3	4.4.3 The time period for meanwhile uses will vary and temporary permission may be renewed with consideration for site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.	London Councils	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.4 9	H5 A	A The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 0	H5 A 1	A ... Specific measures to achieve this aim include: 1) requiring residential and mixed-use developments major developments which trigger affordable housing requirements ^{42A} to provide affordable housing through the threshold approach (<u>Policy H6 Threshold approach to applications</u>) ^{41C} All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with <u>Policy H2 Small sites and small housing developments</u>	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 1	H5 A 3	A ... Specific measures to achieve this aim include: 3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio development programme , and 60 per cent in the case of strategic partners ^{42B} ^{41D} Strategic partners are affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60 per cent of them genuinely affordable.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 2	H5 A 4	A ... Specific measures to achieve this aim include: 4) public sector land ^{42C} delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio across its portfolio ^{41E} Separate affordable housing requirements apply to estate regeneration schemes on public sector land, which are set out in <u>Policy H10 Redevelopment of existing housing and estate regeneration.</u>	Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 3	H5 A 5	5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio		Readability	Restructuring of Policy, which has no consequences for the assessment.

ESC.4.5 4	H5 A 5A	A ... Specific measures to achieve this aim include: 5A) industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u>, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.		Consistency within the Plan	Minor addition, which has no consequences for the assessment.
ESC.4.5 5	H5 B	B Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 6	H5 4.5.1	4.5.1 Delivering more genuinely affordable housing⁴³ is a key strategic issue for London... ⁴³ The Glossary provides the definition of affordable housing, this is consistent with the 2012 NPPF definition of affordable housing The NPPF defines affordable housing for planning purposes. Within this broad definition, sections 4.7.3 - 4.7.69 of this Plan set out the Mayor's preferred affordable housing tenures and other genuinely affordable housing products.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 7	H5 4.5.2A	4.5.2A Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.4.5 8	H5 4.5.4A	4.5.4A The Mayor expects all affordable housing providers to deliver as much affordable housing as possible. Affordable housing providers with agreements with the Mayor should deliver at least 50 per cent affordable housing across their development programme, and in the case of strategic partners, 60 per cent. Affordable housing commitments by these providers are not planning requirements that can be applied to individual sites as the commitments are only achievable if the affordable housing providers have the flexibility to use their resources strategically to maximise affordable housing provision across London.		Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.4.5 9	H5 4.5.4B	4.5.4B Public sector land represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the		Clarification	Additional supporting text, which has no consequences for the assessment.

		city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 percent.			
ESC.4.6 0	H5 4.5.4C	4.5.4C Most industrial land fulfils a vital role in supporting London's economy. However, it is occasionally deemed appropriate for residential uses. In these circumstances, there is potential for a significant difference in value between the two uses. The Mayor expects that residential proposals in industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.		Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.4.6 1	H5 4.5.5	4.5.5 Affordable housing should be delivered on site to help deliver mixed and inclusive communities providing choice to a range of Londoners...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 2	H5 4.5.6 Footnote 66	⁶⁶ For exceptions see part F of Policy H2 Small sites and small housing developments and Policy H18 Large-scale purpose-built shared living.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 3	H6 A	A The threshold approach applies to major development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm which trigger affordable housing requirements (see paragraph 4.6.14 for exclusions to the threshold approach and 4.6.15 for scheme types with bespoke approaches).		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 4		B The threshold level of affordable housing on gross residential development is initially set at: 1) a minimum of 35 per cent; or			Minor change to wording, which has no consequences for the assessment.
ESC.4.6 5	H6 B	B The threshold level of affordable housing on gross residential development is initially set at:	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 6	H6 B 2	2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or	Public sector landowners, London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 7	H6 B 3	3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites Non-Designated Industrial Sites deemed appropriate to release appropriate for other residential uses (see in accordance with Policy E7 Industrial intensification, co-location and	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.

		<u>substitution of land for industry, logistics and services to support London's economic function</u>), where the scheme would result in a net loss of industrial capacity.			
ESC.4.6 8	H6 B	B ...The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.4.6 9	H6 C 1	C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy. Where agreed by the borough, small housing developments^{46A} may follow the Fast Track Route where they meet the relevant threshold level off-site or as an in lieu payment^{46B} ^{46A} Small housing developments are defined in <u>Policy H2 Small sites</u> as schemes providing up to 25 homes ^{46B} Small housing development affordable housing requirements provided off-site or as an in-lieu contribution should follow the approach set out in paragraphs 4.5.7 to 4.5.9	Developers, London Boroughs	Clarification	Additional text, which has no consequences for the assessment.
ESC.4.7 0	H6 C 2	C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: ... 2) be consistent with the relevant tenure split (see Policy H7 Affordable housing tenure). Small housing developments may follow the Fast Track Route where the tenure split is to the satisfaction of the borough.	Developers, London Boroughs	Clarification	Additional text, which has no consequences for the assessment.
ESC.4.7 1	H6 C 4	C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: ... 4) demonstrate that they have taken account of the strategic 50 per cent target in <u>Policy H5 Delivering affordable housing</u> and have sought grant where required to increase the level of affordable housing beyond 35 per cent.		Clarification	Additional text, which has no consequences for the assessment.
ESC.4.7 2	H6 CA	CA Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.	Pocket Living	Clarification	Additional text, which has no consequences for the assessment.
ESC.4.7 3	H6 G	G For schemes that were approved under the Fast Track Route and schemes determined before the threshold approach that would have qualified for the Fast Track Route , any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in part C	Developers, London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.7 4	H6 H	H For schemes where the original permission did not meet the threshold or required tenure split, including schemes determined before the threshold approach that would not have qualified for the Fast Track Route , viability information will be required where an application is submitted to vary the consent and the borough or the Mayor where relevant consider this would materially alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.	Developers, London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.7 5	H6 4.6.3	4.6.3 The percentage of affordable housing on a scheme should be measured in habitable rooms ^{46C} . If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace ^{46D} . ^{46C} Habitable room is defined in the Glossary ^{46D} Habitable floorspace is defined in the Glossary	London Boroughs	Clarification	Additional text, which has no consequences for the assessment.
ESC.4.7 6	H6 4.6.4	4.6.4 The 35 per cent threshold level will be monitored and reviewed in 2021 to determine whether this threshold should be increased.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.7 7	H6 4.6.5A	4.6.5A Public sector land also represents...		Readability	Minor change, which has no consequences for the assessment.
ESC.4.7 8	H6 4.6.6	4.6.6 Given the difference in values between industrial and residential development, where all residential development proposals that would result in a net loss of industrial capacity on Strategic Industrial Locations, Locally Significant Industrial Sites or other industrial sites are Non-Designated Industrial Sites deemed acceptable for release (see <u>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>); they are expected to deliver a higher level of provide at least 50 per cent affordable housing. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing. Therefore, to follow the Fast Track Route industrial sites will need to meet the 50 per cent threshold.	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.7 9	H6 4.6.8B	4.6.8A In some circumstances it may be impractical or otherwise unsuitable to provide on-site affordable housing with the relevant tenure split on small housing developments (see <u>Policy H2 Small sites and small housing developments</u>). Affordable housing providers may not be willing or able to absorb a small number of affordable homes into their portfolio where servicing and management costs would exceed plausible income from	London Boroughs, Developers	Clarification	Reassessment required to ensure the circumstances around which affordable housing may not be provided at small sites is fully assessed in the IIA.

		service charges. Servicing and management costs may be reduced where affordable homes are provided in a single affordable tenure.			
ESC.4.8 0	H6 4.6.8C	4.6.8B Boroughs may therefore permit small housing developments to access the Fast Track Route where on-site affordable housing is provided in a single affordable housing tenure to the satisfaction of the borough. Where there is no demand from affordable housing providers for a small number of affordable homes, either where provided as mix of affordable tenures or in a single affordable housing tenure, boroughs may permit small housing developments to access the Fast Track Route where the relevant threshold is met off-site or as an in-lieu payment. Boroughs are encouraged to set out their approach to affordable housing requirements on small housing developments.	London Boroughs, Developers	Clarification	Reassessment required to ensure the circumstances around which affordable housing may not be provided at small sites is fully assessed in the IIA.
ESC.4.8 1	H6 4.6.8D	4.6.8D To incentivise schemes that are largely or entirely with a high proportion of genuinely affordable housing, schemes that propose 75 per cent or more genuinely affordable housing, consistent with the glossary definition of affordable housing, may be considered under the Fast Track Route whatever the affordable housing tenure mix as long as the tenure and type of home are, where supported by the borough and, where relevant, the Mayor, as being genuinely affordable. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.	Pocket Living	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.8 2	H6 4.6.13	4.6.13 In Opportunity Areas, boroughs may want to consider applying a localised affordable housing threshold for the Fast Track Route or fixed affordable housing requirements. This approach could help provide certainty to developers and land owners and help prevent land price rises based on hope value. Localised affordable housing thresholds, or fixed affordable housing requirements should increase the affordable housing provision beyond 35 per cent where possible. Boroughs may also consider a local approach in terms of tenure mix. The London Plan threshold approach will apply in Opportunity Areas where a local approach has not been progressed.	London Boroughs, Developers	Clarification	Reassessment required to ensure the impact of removing the housing threshold requirement is understood.
ESC.4.8 3	H6 4.6.14	4.6.14 Some schemes are not suitable to follow the Fast Track Route. These schemes must follow the Viability Tested Route . This includes: ...		Clarification	Minor change to wording, which has no consequences for the assessment.

		<ul style="list-style-type: none"> applications for schemes that involve the demolition of existing affordable dwellings which should follow the approach set out in <u>Policy H10 Redevelopment of existing housing and estate regeneration</u> 			
ESC.4.8 4	H6 4.6.15	4.6.15 The approach for Build to Rent schemes, where they meet the definition, is set out <u>Policy H13 Build to Rent</u>		Clarification	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.8 5	H6 4.6.16	4.6.16 Policy H13 Build to Rent. <u>Policy H15 Specialist older persons housing.</u> <u>Policy H17 Purpose-built student accommodation</u> and <u>Policy H18 Large-scale purpose-built shared living</u> set out specific affordable housing approaches in those types of development.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.8 6	H7 A	A The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to residential development:		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.4.8 7	H7 A 1	A ... The following split of affordable products should be applied to residential development: 1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent , allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.8 8	H7 A 2	A ... The following split of affordable products should be applied to residential development: ... 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.8 9	H7 A 3	A ... The following split of affordable products should be applied to residential development: ... 3) the remaining 40 per cent to be determined by the relevant borough as low cost rented homes or intermediate products (defined in H7A1 and H7A2) based on identified need, provided they are consistent with the definition of affordable housing.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.9 0	H7 A	A ... These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.		Clarification	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.9 1	H7 B	B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in part A. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in H7A1 and H7A2), and should take		Clarification	Minor change to wording, which has no consequences for the assessment.

		into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.			
ESC.4.9 2	H7 4.7.1	4.7.1 As Table 4.3 demonstrates, the The 2017 SHMA shows...	London Boroughs, Developers	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.4.9 3	H7 4.7.1	4.7.1 ... These minimums in H7A1 and H7A2 will be monitored and reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.9 4	H7 4.7.2	4.7.2 There is a presumption that the 40 per cent to be decided by the borough will focus on Social Rent and London Affordable Rent...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.9 5	H7 Table 4.3	<i>Table 4.3 deleted from H7 and moved to H12</i>		Clarification	Minor change, which has no consequences for the assessment.
ESC.4.9 6	H7 4.7.3	4.7.3 The Mayor is committed to delivering genuinely affordable housing. Within the broad definition of affordable housing ⁴⁸ , the Mayor's preferred affordable housing tenures are: <ul style="list-style-type: none"> Homes based on social rent levels, including Social Rent and London Affordable Rent 		Clarification	Reassessment required to ensure the IIA has appropriately assessed Social Rent as the preferred option.
ESC.4.9 7	H7 4.7.3 Footnote 48	⁴⁸ See the Glossary for broad definition of affordable housing which is consistent with the 2012 NPPF.		Clarification	Minor change, which has no consequences for the assessment.
ESC.4.9 8	H7 4.7.4	4.7.4 London Affordable Rent is rent and Social Rent homes are for households on low incomes with where the rent levels are based on social rent levels the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. The NPPF defines affordable rent as up to 80 per cent of market rent, however, to ensure rents in London are genuinely affordable, the Mayor expects rents charged for homes let for London Affordable Rent to be set at benchmarks substantially below this level, based on traditional social rents. Rents for both are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF. More detail is contained within the Mayor's Homes for Londoners Affordable Homes Programme 2016-21 funding guidance. These homes will be allocated in accordance with need (based on the borough's allocations policy).	London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.9 9	H7 4.7.7	4.7.7 Other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the draft London Housing Strategy		Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 00	H7 4.7.11	4.7.11 To follow the Fast Track Route, the threshold level of affordable housing tenure of 35 per cent of homes must adhere to the tenure split set out in <u>Policy H7 Affordable housing tenure</u> . Where a scheme is delivering more than the threshold 35 per cent , the tenure of the additional affordable housing (above the threshold) is flexible and should be agreed between the borough, Registered Provider and applicant take into account the need to maximise affordable housing provision along with any preference of applicants to propose a particular tenure.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 01	H7 4.7.13	4.7.13 To incentivise schemes that are largely or entirely affordable housing, schemes that propose 75 per cent or more affordable housing, consistent with the glossary definition of affordable housing, may be considered under the Fast Track Route whatever the affordable housing tenure mix as long as the tenure and type of home are supported by the borough and, where relevant, the Mayor, as being genuinely affordable. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.		Readability	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 02	H9 C	C To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years at realistic prices on realistic terms reflecting market value.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 03	H9 C	C ... These requirements should not apply to heritage buildings on the At Risk register where prolonged vacancy may damage the building.	The Putney Society	Clarification	Reassessment required to ensure heritage buildings are fully considered within the IIA.
ESC.4.1 04	H9 4.9.3	4.9.3 It should be noted that if an applicant is claiming that the scheme qualifies for VBC, it cannot also claim the vacant buildings are 'in-use' for the purpose of calculating liability for the Community Infrastructure Levy relief through the vacancy test.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 05	H10 A	A Loss of existing housing is generally only acceptable where the housing is should be replaced by new housing at existing or higher densities with at least the equivalent level of overall	Just Space, Elephant Amenity Network,	Readability	Minor change to wording, which has no consequences for the assessment.

		<p>floorspace. This includes the loss Loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is should be satisfactorily re-provided to an equivalent or better standard.</p>	35% Campaign, Individuals		
ESC.4.1 06	H10 B H10 C	<p>B Where loss Loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace on an identical or equivalent basis^{50A}, and generally should produce an uplift in affordable housing provision. All such schemes are required to follow the Viability Tested Route and should produce an uplift in affordable housing provision where viable (see <u>Policy H6 Threshold approach to applications</u>).</p> <p>C For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications).</p> <p>^{50A} Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis. I.e. Social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.</p>	RPs, London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification	Minor change to wording and restructuring, which has no consequences for the assessment.
ESC.4.1 07	H10 4.10.2	<p>The aims of an estate regeneration project will typically fall into three broad categories. These are:</p> <ul style="list-style-type: none"> • maintaining good quality homes • maintaining safe and good quality homes • improving the social, economic and physical environment in which homes are located. • delivering safe and better-quality homes for local people; • increasing the overall supply of new and affordable homes; and • improving the quality of the local environment through a better public realm and provision of social 		Clarification	Minor change to wording, which has no consequences for the assessment.

		infrastructure (e.g. schools, parks, or community centres).			
ESC.4.1 08	H10 4.10.3	4.10.3 ... This is particularly pertinent for estate regeneration, and any proposals for such schemes should take account of the requirements of the Mayor's Good Practice Guide to Estate Regeneration (2018) .		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 09	H10 4.10.4	4.10.4 It is important to ensure that estate regeneration does not lead to the loss of affordable housing and that it delivers an uplift in affordable housing is delivered wherever possible. Therefore , all estate regeneration schemes should must go through the Viability Tested Route to demonstrate they have and maximised the delivery of any additional affordable housing. For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of the stock .	London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 10	H11 A	A Boroughs should promote efficient use of existing housing stock by using all the tools available to reduce the number of vacant and under-occupied dwellings.	Inner-London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 11	H11 B	B The Mayor will support boroughs with identified issues of new homes being left empty, sometimes known as 'buy to leave' properties, to put in place mechanisms which seek to ensure stock is new homes are occupied.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 12	H11 C	C Boroughs should take account of the impact on the housing stock and local housing need when considering of applications for a change of use from home housing to be used as short stay holiday rentals accommodation to be used for more than 90 days a year.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 13	H11 D	D Boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.	London Boroughs	Clarification	Reassessment required to ensure the importance of protecting appropriate HMOs is fully assessed in the IIA.
ESC.4.1 14	H11 4.11.1	4.11.1 ... While the numbers of long-term vacant properties in London has decreased significantly and is now below one per cent of the housing stock, to make best use of existing stock, where vacant properties are identified, local authorities should investigate why the units are vacant and where possible seek to bring them back into use. Boroughs should levy the council tax empty homes premium to incentivise occupation of vacant properties . Boroughs are encouraged to use all the tools at their disposal such as Empty Dwelling	London Boroughs,	Clarification	Reassessment required to ensure the use of these tools (empty homes premium and downsizing) is fully assessed in the IIA.

		Management Orders to bring long-term vacant stock back into use as affordable housing. Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and tenants in affordable homes are supported to downsize where they wish to do so.			
ESC.4.1 15	H11 4.11.1B	4.11.1B A recent phenomenon in some parts of London has seen a proportion of new homes being purchased by investors who rely solely on capital appreciation for their returns. New homes purchased for this purpose are sometimes known as 'buy to leave'. This practice reduces the amount of new housing stock being occupied by households in need. Where the practice is widespread in a new building it can also negatively affect the provision of services to tenants.	Developers, London Boroughs	Clarification	Reassessment required to ensure 'buy to leave' issues are considered in the IIA.
ESC.4.1 16	H11 4.11.2	4.11.2 In addition, the use of dwellings as short-term holiday rentals can have a significant impact on the supply of homes in an area that are available for people to live in. Homes should not be It is unlawful for homes in Greater London to be used as short-term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission ^{52A} . The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in. ^{52A} Pursuant to the Deregulation Act 2015 (Sections 44 and 45: Short-term use of London accommodation: relaxation of restrictions and power to relax restrictions.)	London Boroughs, Developers	Clarification	Reassessment required to ensure the negative impacts holiday rentals can have on local communities is assessed in the IIA.
ESC.4.1 17	H11 4.11.2B	4.11.2B Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. ...		Readability	Additional supporting text, which has no consequences for the assessment.
ESC.4.1 18	H12 A	A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms ...	MoHCLG	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 19	H12 A 1	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:		Clarification	Minor change to wording, which has no consequences for the assessment.

		1) the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment and, where relevant, local assessments, where available, by evidence of local needs			
ESC.4.1 20	H12 A 6	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations which are closer to a town centre or station or with higher public transport access and connectivity	London Boroughs, Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 21	H12 A 8	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 8) the ability of new development to reduce pressure on conversion and , sub-division and amalgamation of existing stock	Inner-London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 22	H12 A 10	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 10) the potential for custom-build and community-led housing schemes	Community Land Trust	Clarification	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 23	H12 B	B Generally, schemes consisting mainly of one-person units and/or one-bedroom units should be resisted.	MoHCLG	Clarification	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 24	H12 D 1	1) evidence of local housing needs, including the numbers and types of overcrowded and under-occupying households.		Clarification	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 25	H12 D 2	2) other the criteria set out in part A, including the strategic and local requirement for 2) the local and strategic need for affordable family accommodation		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 26	H12 D 3 H12 D 4 H12 D 5	3) Local issues of overcrowding 4)3) the impact of welfare reform 5)4) the cost of delivering larger units and the availability of grant.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 27	H12 4.12.1	4.12.1 The 2017 London Strategic Housing Market Assessment estimated the unit size mix of new homes required to meet London's current and projected housing needs. The main factors influencing this size mix include the projected growth in different household types and the substantial number of overcrowded households in London, whose needs can be addressed by providing family-sized homes but also smaller homes for concealed		Clarification	Additional supporting text, which has no consequences for the assessment.

		<p>households to move into. Table 4.3 shows the mix of homes identified in the London 2017 Strategic Housing Market Assessment.</p> <p><i>(Note: Table 4.3 relocated from H7 to H12)</i></p>			
ESC.4.1 28	H12 4.12.2	4.12.2 ... Moreover, they do not necessarily meet the identified need for which they are being required; for example, larger market units are often required by boroughs in order to meet the needs of families but many such units are instead occupied by sharers.	GLA Labour Group	Factual update (intermediate homes cannot be occupied by sharers).	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 29	H12 4.12.3	4.12.3 Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing.	GLA Housing Committee	Clarification	Removal of reference has no consequences for the overall assessment.
ESC.4.1 30	H12 4.12.5	4.12.5 While one-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However , one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes. Thus, unless supported by the borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person/one-bed units should be avoided to ensure that there is a mix of unit sizes. Specific guidance on large-scale purpose-built shared living schemes can be found in <u>Policy H18 Large-scale purpose-built shared living.</u>	MoHCLG	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 31	H12 4.12.6A	4.12.6A The impact of this policy on the mix of homes in terms of numbers of bedrooms approved across London will be carefully monitored and assessed as part of the Annual Monitoring Report process. This will highlight any adverse impacts and identify if any revisions are necessary to the policy.	GLA Housing Committee	Clarification	Additional wording, which has no consequences for the assessment.
ESC.4.1 32	H12 4.12.7	4.12.7 Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use		Readability	Restructuring of Policy, which has no consequences for the assessment.

		Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.			
ESC.4.1 33	H13 A	A To recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where Where a development meets the criteria set out below in H13B , the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. Affordable housing DMR homes should must be secured in perpetuity.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 34	H13 B	B To qualify as a Build to Rent scheme within the context of this policy , all the following criteria must be met:		Readability	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 35	H13 B 1 Footnote 53	⁵³ ... However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.		Readability	Restructuring of Policy, which has no consequences for the assessment.
ESC.4.1 36	H13 B 3	B ... all the following criteria must be met: ... 3) a clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken that ensures there is no financial incentive to break the covenant		Consistency with other GLA strategies	Removal of reference has no consequences for the overall assessment.
ESC.4.1 37	H13 B 7	B ... all the following criteria must be met: ... 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 38	H13 C	C For Build to Rent schemes to To follow the Fast Track Route they , Build to Rent schemes must deliver at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution. of which The Mayor expects at least 30 per cent should be of DMR homes to be provided at an equivalent rent to London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant remaining 70 per cent at a range of genuinely affordable rents^{54A} . Schemes must also meet all other requirements of part C of <u>Policy H6 Threshold approach to applications</u> . This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		^{54A} Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.			
ESC.4.1 39	H13 4.13.1	4.13.1 The planning system Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 40	H13 4.13.4	4.13.4 ... London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will update it every year. DMR should be allocated according to intermediate eligibility criteria, which can include locally defined eligibility criteria. Where the borough has an intermediate or DMR waiting list they should agree with the applicant a process for providing priority access to the DMR units for those on the waiting list.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 41	H13 4.13.6	4.13.6 To follow the Fast Track Route schemes should provide the threshold level of DMR homes with at least 30 per cent of the affordable housing must be let at London Living Rent levels. The remainder should be provided at a range of genuinely affordable discounts below market rent based on local need to be agreed with the borough and Mayor where relevant, for example with half of remaining units at 50 per cent and half at 70 per cent of market rents. The thresholds and required discounts to market rent will be reviewed and if necessary updated in 2021 through Supplementary Planning Guidance.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 42	H13 4.13.7	4.13.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u> where the scheme would result in a net loss of industrial capacity, or that do not meet the criteria of part C of <u>Policy H6 Threshold approach to applications</u> will be subject to the Viability Tested Route under part E of <u>Policy H6 Threshold approach to applications</u> .		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.1 43	4.13.12	4.13.12 Further support for Build to Rent can be given by boroughs through: ... <ul style="list-style-type: none"> supporting institutional investment on public sector land, including exploring the use of joint ventures or deferred receipts. 		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 44	H14 A	A The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners (see Policy D5 Accessible housing) within a wider inclusive community setting . Supported and specialised accommodation could include:	Inclusion London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 45	H14 A 1	A ... Supported and specialised accommodation could include: <ol style="list-style-type: none"> move-on accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently 	LB Havering LB Redbridge London Assembly Planning Committee GLA Labour Group David Bonnet Associates	ClarificationLack of a definition for 'move on' accommodation so removed	Reassessment required to ensure care leavers and people leaving prison are considered as part of the assessment, particularly within the EqIA.
ESC.4.1 46	H14 A 2	A ... Supported and specialised accommodation could include: ... <ol style="list-style-type: none"> accommodation for young people with support needs 	LB Camden Westminster City Council David Bonnet Associates	Clarification	Reassessment required to ensure care leavers and people leaving prison are considered as part of the assessment, particularly within the EqIA.
ESC.4.1 47	H14 4.14.1	4.14.1 Boroughs should undertake assessments of the need for short and long-term, medium-term and permanent needs for supported and specialised accommodation within their borough...	David Bonnet Associates	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 48	H14 4.14.1	4.14.1 ... For some groups, need may be best assessed and met on a multi-borough or pan-London basis.	GLA labour group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 49	H15 A 2	A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of: ... <ol style="list-style-type: none"> the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to relevant facilities, social infrastructure, health care and public transport facilities are well served by public transport 	Age UK Just space Brentford Community Council London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 50	H15 4.15.3	4.15.3 ... There is a range of specialist accommodation options and the following definitions should be applied in London: <p>...</p> <ul style="list-style-type: none"> residential nursing care accommodation (including end of life/ hospice care, nursing care units and dementia care 	LB Sutton LB Bromley	Clarification.	Minor change to wording, which has no consequences for the assessment.

		home accommodation) should be considered as C2 as it provides non-self-contained residential accommodation for people who require for whom additional personal or nursing care is essential . Rooms may be private or shared and may provide an ensuite bathroom. Communal facilities are likely to include a dining room and residents' lounge, with meals and personal services routinely provided to all residents. Personal or nursing care is a critical part of the accommodation package at residential/nursing care accommodation. Care homes are unlikely to provide more than 80 bed spaces in total.			
ESC.4.1 51	H15 4.15.4	4.15.4 Research has identified a total potential demand in London across all tenures for just over 4,000 specialist older persons units a year between 2017 and 2029. Table 4.4 provides these requirements as annual borough indicative benchmarks for specialist older persons housing (C3) 2017-2029.	Royal Borough of Kingston, LB Bromley, HBF	Clarification	
ESC.4.1 52	H15 4.15.7	4.15.7 The fast track route for affordable housing delivery is available for specialist older persons housing providers. Where an application does not meet the requirements set out in part C of Policy H6 Threshold approach to applications it must follow the Viability Tested Route. Specialist older persons accommodation housing (C3) should provide affordable housing in line with Policy H5 Delivering affordable housing and Policy H6 Threshold approach to applications. However, the tenure split requirements for specialist older persons accommodation housing may differ to those set out in <u>Policy H7 Affordable housing tenure</u> . Where they do, they should be clearly set out in local Development Plan Documents or supplementary guidance . Specific tenure flexibility for small sites is provided in Policy H2 Small sites and small housing developments and Policy H6 Affordable housing tenure. Schemes meeting the threshold set out in Policy H6 Threshold approach to applications will be considered under the Fast Track Route, but developments not delivering this will be subject to the Viability Tested Route.	LB Merton	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 53	H15 4.15.8	4.15.8 Specialist older persons housing developments should also provide a suitable level of safe storage and charging facilities for residents' mobility scooters, to prevent them from being stored the storage of these in communal corridors or spaces which are not designed or suitable for this purpose.	Access Association, Withernay projects	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.1 54	H15 4.15.10	4.15.10 Residential or nursing care accommodation (C2) is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. ...	LB Sutton, LB Bromley	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 55	H16 B	B As of the start of this Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need: People with a cultural tradition of nomadism, a nomadic habit of life , or living in a caravan, whatever their race or origin, including: ...	Advocacy groups for Gypsies and Travellers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 56	H16 C H16 D	C Boroughs that have not undertaken needs assessment since 2008 should identify need by either: 1) undertake undertaking a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above) using on the definition for Gypsies and Travellers set out above ; or 2) use the midpoint figure of need for Gypsy and Traveller accommodation provided in Table 3 4.5 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process. D Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.	Advocacy groups for Gypsies and Travellers, Just Space London Gypsies & Travellers Unit	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 57	H16 E	E Boroughs should undertake an audit of existing local authority provided Gypsy and Traveller pitches and sites and pitches, working with residents occupying these , identifying: ... 3) pitches in need of refurbishment and/ or provision of enhanced infrastructure (including utilities, open space and landscaping) .	Kent County Council, Just Space	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 58	H16 F	F Boroughs should actively plan to protect existing Gypsy and Traveller accommodation and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.	Advocacy groups for Gypsies and Travellers, LB Enfield	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 59	H16 4.16.2	4.16.2 ... This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.

		<ul style="list-style-type: none"> due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single mothers-parents). 			
ESC.4.1 60	H16 4.16.4	4.16.4 This often results in Gypsies and Travellers not being recognised or counted in needs assessments , with many needs assessments identifying zero need. This has a direct impact on the housing accommodation options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.	Advocacy groups for Gypsies and Travellers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 61	H16 4.16.8	4.16.8 To assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners 2016-24 Affordable Homes Programme for the provision of new pitches, on a single or multi- borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 62	H16 4.16.8A	<i>Moved from 4.16.10</i> 4.16.8A Where new Gypsy and Traveller pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.		Readability	Reassessment required to ensure the support for other groups, including disabled people and children, are included in the assessment, particularly within the EqIA.
ESC.4.1 63	H16 4.16.9	4.16.9 If existing Gypsy and Traveller pitches or Travelling Showpeople's or circus people's sites or plots have to be re-located or re-provided within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. The community-Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.	Advocacy groups for Gypsies and Travellers, Gypsies & Travellers Community Law Partnership Solicitors	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 64	H16 4.16.10	<i>Moved to new 4.16.8A</i> 4.16.10 Where new pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.		Readability	Minor change to wording, which has no consequences for the assessment.

ESC.4.1 65	H16 Table 4.4A	Insert new Table 4.4A (see appendix)	Advocacy groups for Gypsies and Travellers, Just Space, London Gypsies & Travellers	Clarification	Minor change, which has no consequences for the assessment.
ESC.4.1 66	H17 Throughout policy and supporting text	Change all references of: higher education institution/ institutions to: higher education provider/ providers	London Higher Education Providers, NUS, University of London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 67	H17 A 2	A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: ... 2) the use of the accommodation is secured for students ^{59A} 59A For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students.	London Forum, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 68	H17 A 3	A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: ... 3) the accommodation is secured through a nomination agreement for occupation by students-members of one or more specified higher education provider^{59B} institutions 59B A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found here www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/. This register can be used to determine if a higher education provider deliver designated courses and thus satisfies	Higher education providers, British Property Federation', London Boroughs, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

		the above definition. Further advice on higher education providers and designated courses can be obtained by contacting London Higher at enquiry@londonhigher.ac.uk.			
ESC.4.1 69	H17 A 4	A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: ... 4) at least 35 per cent of the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance, a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u> b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in <u>Policy H6 E Threshold approach to applications.</u>	London Boroughs, Higher education providers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 70	H17 B Part B	B Boroughs, student accommodation providers and higher education providers institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed-use regeneration and redevelopment schemes.	Higher education providers, Tide Construction Ltd, Get Living London, London First, Watkin Jones Group, Unite Students	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 71	H17 4.17.2	4.17.2 The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified ^{59C} . ^{59C} Student population projections and accommodation need for new London Plan 2017. GLA		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 72	H17 4.17.3	... development must have an undertaking agreement in place from initial occupation with one or more higher education providers , to provide housing for its students at one or more specified higher education institutions , and to commit to have such an agreement for as long as the development is used for student accommodation. This agreement is known as a nomination agreement. A majority of the bedrooms in the development must be covered by such an undertaking these agreements . Therefore, the borough should ensure, through condition or legal agreement, that the development will, from the point of occupation, continue to maintain a nominations	Higher education providers, British Property Federation, London Boroughs, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

		agreement or enter a new nomination agreements with one or more specified-higher education provider institution (s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation or such time period as the borough considers is appropriate . There is no requirement for the higher education provider institution linked by the agreement to the PBSA to be located within the borough where the development is proposed.			
ESC.4.1 73	H17 4.17.3A	4.17.3A Where all the bedrooms in the PBSA development are provided at a rental cost that qualify as affordable student accommodation as defined in paragraph 4.17.7 and maintained in perpetuity through legal agreement or condition, there is no requirement for it to have a nomination agreement with a higher education provider.	British Property Federation, NUS, London Higher, Cass and Claredale Halls.	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.1 74	H17 4.17.4	4.17.4 If the accommodation is not secured for use by students and secured through a nomination agreement for occupation by students-members of one or more specified-higher educational providers institutions as set out in paragraph 4.17.3 or is exempt from this requirement as set out in paragraph 4.17.3A Policy H18 Large-scale purpose-built shared living , it will not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation; and the development proposal will normally be considered large-scale purpose-built shared living and be assessed by the requirements of <u>Policy H18 Large-scale purpose-built shared living</u> .	British Property Federation, NUS, London Higher, Cass and Claredale Halls.	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 75	H17 4.17.6	4.17.6 To ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA, the maximum level a proportion (35 per cent) of bedrooms in PBSA are required to be affordable at this income level.	London Boroughs, Higher education providers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 76	H17 4.17.8	4.17.8 To provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation a threshold has been introduced for PBSA schemes to take advantage of the Fast Track Route. To follow the Fast Track Route t The amount of affordable student accommodation provided in a development should be at least 35 per cent of student bedrooms in the development or 50 per cent where required by part A4a of Policy H17 . If 35 per cent the required threshold for affordable student accommodation is not met, a scheme will be considered under the Viability Tested Route in line with part E of <u>Policy H6</u> .	London Boroughs, Higher education providers	Clarification	Minor change to wording, which has no consequences for the assessment.

		<u>Threshold approach to applications</u> and the Mayor's Affordable Housing and Viability SPG.			
ESC.4.1 77	H17 4.17.11	4.17.11 ... affordable student accommodation bedrooms should be part of the PBSA that is subject to a nominations agreement. ...		Readability	
ESC.4.1 78	H17 4.17.12	4.17.12 To enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, visitors , interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. The temporary use should not disrupt the accommodation of the resident students during their academic year. Conditions and/or legal agreements could be attached to any planning permission to ensure that the ancillary use does not result in a material change of use of the building.	Higher education providers, British Property Federation, NUS	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 79	H17 4.17.13A	4.17.13A In monitoring the implementation of this policy, particular regard will be given to the delivery of PBSA, the amount of affordable student accommodation provided, and the rental costs of the non-affordable rooms in PBSA developments.	London Boroughs, London Councils, Higher education providers, NUS, Unite Students, community groups, London Assembly Planning Committee	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.1 80	H18 A	Large-scale purpose-built shared living Sui-Generis use development ^{61A} s, where of good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it must meets all the following criteria: ... ^{61A} Large-scale purpose-built shared living developments are sui generis use class	London Boroughs,	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 81	H18 A 1	A ... the following criteria: 1) it meets an identified need it is of good quality and design	London Boroughs,	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 82	H18 A 1A	A ... the following criteria: ... 1A it contributes towards mixed and inclusive neighbourhoods		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 83	H18 A 5	A ... meets all the following criteria: ... 5) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include offer at least: ...	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.4.1 84	H18 A 5 F	A ... meets all the following criteria: ... f) community management	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 85	H18 A 6	A ... meets all the following criteria: ... 6) the private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation are not self-contained homes or capable of being used as self-contained homes	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 86	H18 A 8	A ... meets all the following criteria: ... 8) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the residential units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution , to be provided at a discount of 50 per cent of the market rent. If a lower contribution is proposed the scheme All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in part E of Policy H6 Threshold approach to applications , however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent, or 50 per cent of the units at a discount of 50 per cent of the market rent where the development is on public sector or industrial land, will not be subject to a Late Stage Viability Review.	London Boroughs	Clarification Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 87	H18 4.18.1	4.18.1 Large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.	London Boroughs	Clarification	Minor addition, which has no consequences for the assessment.
ESC.4.1 88	H18 4.18.1A	4.18.1A This policy applies to large-scale purpose-built shared living developments ...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 89	H18 4.18.2	4.18.2 Development proposals for such schemes should only be supported where they meet an identified market need.	London Boroughs	Clarification	Minor change, which has no consequences for the assessment
ESC.4.1 90	H18 4.18.3	4.18.3 To qualify as Large-scale purpose-built shared living developments , the development, or block or phase within a development must be are generally of at least 50 units. This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. To ensure this form of accommodation is		Clarification	Minor change to wording, which has no consequences for the assessment.

		meeting its specific housing need, it is important that it does not effectively become a hostel, so Tenancies should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel.			
ESC.4.1 91	H18 4.18.4	4.18.4 ... The agreed management plan should be secured through a Section 106 agreement and should include, but not be limited to, detailed information on: ... f. on-site staff and their responsibilities g. with reference to the on-site staff, what internal community events will take place and how the surrounding community will be engaged.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 92	H18 4.18.5	4.18.5 ... Buildings should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people: • an on-site community manager should help to organise events to encourage social interaction between residents.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 93	H18 4.18.6	4.18.6 The private units should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and kitchenettes limited cooking facilities . There are currently no minimum space standards for these units communal and private areas of this type of accommodation	London Boroughs,	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.4.1 94	H18 4.18.8	4.18.8 A borough can decide whether it would prefer the financial contribution as a single upfront payment for affordable housing (part A8a of <u>Policy H18 Large-scale purpose-built shared living</u>), which will be based on a 50 per cent discount to market value of 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u> ⁶² , or an ongoing in perpetuity payment linked to actual rental income (part A8b of <u>Policy H18 Large-scale purpose-built shared living</u>). The ongoing payment should be based on 50 per cent of rental income for 35 per cent of units for as long as the development is used for this form of accommodation. if these affordable housing contribution requirements are not met, the scheme will be considered under the Viability Tested Route in line with part E of <u>Policy H6 Threshold approach to applications</u> and the Mayor's Affordable Housing and Viability SPG. Because of the immaturity of the market for this type of development, all large-scale purpose-built shared living developments will be assessed under the Viability Tested	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>Route as set out in <u>Policy H6 Threshold approach to applications</u>. However, schemes which meet the relevant threshold will not be subject to a Late Stage Viability Review.</p> <p>⁶²Evidence of the market value of the shared living units will need to be provided under the Fast Track Route to enable the upfront payment to be calculated.</p>			
ESC.4.1 95	H18 4.18.9	4.18.9 The rental cost of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing as shared living units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sqm. Shared living tenants typically pay a room rate that includes utility costs and rent. If a comparison is undertaken it should be on a square metre rental rate, excluding utility costs , of the private accommodation and not a unit rental rate.	Developers	Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 5 Social Infrastructure					
ESC.5.1	S1 A	A Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. Assessments should consider the need for cross-borough collaboration where appropriate.	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.2	S1 E	E New facilities should be easily accessible by public transport, cycling and walking. and should be encouraged in high streets and town centres.	Vital OKR	Consistency with SD6 I	Minor change to wording, which has no consequences for the assessment.
ESC.5.3	S1 F	F Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should be refused unless:	LB Merton	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.4	S1 F 1	F needs assessment required under Part A should be refused unless: 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community , or;	LB Islington LGBTQ+ Community	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.5	S1 F 2	F needs assessment required under Part A should be refused unless: 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and		Readability	Minor change to wording, which has no consequences for the assessment.

		facilities in-order to meet future population needs or to sustain and improve services.			
ESC.5.6	S1 G	G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (See Part F2).	Boroughs Office of London CCGs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.7	S1 Paragraph 5.1.1	5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years , recreation, sports, faith, criminal justice and emergency facilities. Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, <u>Policy G3 Metropolitan Open Land</u> and <u>Policy G4 Local green and oOpen space</u> .	Residents of the Corney Reach Estate, Chiswick	Clarification	Reassessment required to ensure the CSIA includes criminal justice facilities as social infrastructure.
ESC.5.8	S1 Paragraph 5.1.6	5.1.6Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in-order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.9	S1 Paragraph 5.1.7	5.1.7 In all cases, where housing is considered to-be an appropriate alternative use, opportunities for affordable housing provision should be maximised.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.10	S1 Paragraph 5.1.8A	5.1.8A It is also important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. Shared use and co-location of facilities should be encouraged, in-order to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will also help facilities and service providers to-work in a more coherent and joined-up way, and share maintenance and management costs. It could also potentially reduce the need to travel thereby improving accessibility.			Minor change to wording, which has no consequences for the assessment.
ESC.5.11	S2 A 2	A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: 2) Understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in-order to maximise health and social care outcomes.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.12	S2 A 4	A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:	National Health Services England, National Health	Clarification	Minor change to wording, which has no consequences for the assessment.

		4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries.	Services Improvement, Community Health Partnerships		
ESC.5.13	S2 B	B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.14	S2 Paragraph 5.2.2	5.2.2 The NHS Five Year Forward View identifies the need to prevent avoidable illness and transform the way that care is organised and delivered in order to meet increasing demands for healthcare within the resources available.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.15	S2 Paragraph 5.2.6	5.2.6 In assessing the need for new health and social care facilities , consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.16	S2 Paragraph 5.2.7	5.2.7 Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of efficiency savings, service reconfiguration and small adjustments in capacity , for example, through the conversion of non-clinical space to consulting or treatment rooms.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.17	S3 A 1	A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should: 1) identify and address local education and childcare facility needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues within Development Plans.	Ministry of Housing, Communities & Local Government	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.18	S3 A 2	A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should: 2) identify sites for future provision through the Local Plan Development Plan process, particularly in areas with significant planned growth and/or need		Consistency	Minor change to wording, which has no consequences for the assessment.

ESC.5.19	S3 B 4	B Development proposals for education and childcare facilities should: 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage enable all children to travel actively to school (walk, cycle or travel by public transport) walking and cycling		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.20	S3 B 6	B Development proposals for education and childcare facilities should: 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers.	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.21	S3 Paragraph 5.3.2	5.3.1 Access to affordable, accessible and high- quality childcare (pre-school and school age) provision can play a significant role in....		Correction	Minor change to wording, which has no consequences for the assessment.
ESC.5.22	S3 Paragraph 5.3.3 Footnote 65	5.3.3 It is estimated that an additional 100,000 71,000-childcare places are needed between 2016 – 2041 ⁶⁵ . The Childcare Act 2006 places a duty on local authorities to ensure that there are enough childcare places to enable parents to work 65 Childcare Demand for childcare in London – drivers and Projections (2017 March 2018) GLA Intelligence Unit Economics.		Factual Update	Minor change to wording, which has no consequences for the assessment.
ESC.5.23	S3 Paragraph 5.3.5 Footnote 66	5.3.5 There is a growing need for school places in London, with projected demand for 705,000 state maintained primary school places for the academic year 2018/19. This is an increase of 7,000 over the number of places required in 2016/17. The level of need is projected to fall to 686,000 places a year by 2027/28. In 2016/17, there was a need for 403,000 places in state maintained secondary schools. The number of places required is projected to increase by 65,000, over the period to 2027/28 an additional 60,000- 67,000 primary school places and 105,000-122,000 secondary school places in state maintained schools up to 2025 ⁶⁶ .		Factual Update	Minor change to wording, which has no consequences for the assessment.

		⁶⁶ Projected Demand for School Places (2015) 2018 GLA School Place Demand Projections (2018) GLA Intelligence Unit			
ESC.5.24	S3 Paragraph 5.3.6 New Footnote 66A	5.3.6 It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see <u>Policy D3 Inclusive design and Area guidelines for SEND and alternative provision: BB104^{66A}</u>). ^{66A} Department for Education and Education Funding Agency SEND and alternative provision: area guidelines https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines	Ministry of Housing, Communities and Local Government	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.25	S4 A 1	A Boroughs should: 1) undertake audits of existing children and young person's play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision	LB Merton	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.26	S4 B 5	B Development proposals for schemes that are likely to be used by children and young people should: 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.	LB Southwark	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.27	S4 Paragraph 5.4.5	5.4.5 Formal play provision should normally be made on-site and in accordance with Development Plans' play policies for the area, using a benchmark of and provide at least 10 square metres per child to address as a basis for assessing future requirements arising from a projected increase in the child occupancy and play space requirements generated by a development proposal population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.	Boroughs.	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.5.28	S5 A	A In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.5.29	S5 A 3	A In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should: 3) maintain, and promote and enhance networks for walking, cycling and other activities including the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.	Canal & River Trust/Internal	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.30	S5 B 2	B Development proposals for sports and recreation facilities should: 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities	Kingston University	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.31	SD5 B 4	B Development proposals for sports and recreation facilities should: 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's assessment of the need for sports and recreation facilities should be used to identify ongoing or future demand.	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.32	SD5 C	C) Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (<u>Policy G2 London's Green Belt, G3 Metropolitan Open Land and G4 Open Space</u>) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.	Boroughs	Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.5.33	SD5 Paragraph 5.5.3	5.5.3 Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss of green open space.	Sport England	Clarification and consistency	Minor change to wording, which has no consequences for the assessment.

ESC.5.34	S6 A	A Development proposals that include large-scale commercial developments that are open to the public, such as shops, sport , leisure and health care facilities, transport hubs , cultural and civic buildings , and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people, and families with young children and people of all gender identities .	LB Newham, Just Space & Soho Society	Clarification	Reassessment required to ensure the assessment, particularly the EqIA, acknowledges that all gender identities are considered in this Policy.
ESC.5.35	S6 A	AThese should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people, and families with young children and people of all gender identities .	Women's Resource Centre, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.36	S6 B	B-Larger developments Development proposals where users are expected to spend long periods of time or where there is no other local provision, and those defined in Part A , should also provide 'Changing Places' toilets in accordance with the guidance in as identified in the British Standard BS8300-2:2018.	LB Enfield, Westminster CC, LB Hillingdon, LB Southwark, Access Association, Centre for Accessible Environments	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.37	S6 Paragraph 5.6.2	5.6.2 Public toilets should be provided as part of large-scale commercial developments that are open to the public. Boroughs should define 'large-scale' for their local circumstances. Where no local definition is given, 'large-scale' should be taken to mean developments that come under Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008.	Silvertown Homes, Redrow Homes, LB Enfield	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.38	S6 Paragraph 5.6.2A	5.6.2A In smaller developments and subject to local evidence and development plan policy, boroughs may secure access to toilet facilities as part of a community toilet scheme, or secure provision of public toilets through CIL or planning obligations.	LB Southwark	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.39	S6 Paragraph 5.6.3	5.6.3 Taking into account the needs of all Londoners and to provide suitable levels of choice, a range of toilet facilities should be provided. They should include unisex disabled persons' toilets, separate accessible baby change/family toilets, and cubicles for people with ambulant mobility impairments which can also be suitable for some older people or people who require additional space.	LB Enfield	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.5.40	S6 Paragraph 5.6.3	5.6.3Further guidance on the provision and design of these facilities can be found in British Standard BS8300-2:2018 (Design of an accessible and inclusive built environment, Part 2: Buildings – Code of practice). Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets). Consideration should also be given to the provision of gender-neutral toilets.	Women's Resource Centre, Individuals	Clarification	Reassessment required to ensure the assessment, particularly the EqIA, acknowledges that all gender identities are considered in this Policy.
ESC.5.41	S6 Paragraph 5.6.5	5.6.5 Public toilet facilities, whether provided inside buildings or externally, should be safe, well-lit and clean.	LB Southwark	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.42	S6 Paragraph 5.6.7	5.6.7 Further guidance on the types of development where it would be appropriate to provide a Changing Places toilets can be found in British Standard BS8300-2:2018.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.43	S7 C	C Development proposals for new cemetery provision should be supported. This may include provision in one borough to assist faith groups from another borough that are facing burial space shortages.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.44	S7 Paragraph 5.7.1	5.7.1 In London, the demand for burial space for particular faith groups is not always well matched with the availability of burial space. Some boroughs have little or no burial space available ⁷⁰ . For inner and central London boroughs, this requires them to seek provision in outer London or beyond. This can cause problems of access and cost which has a disproportionate effect on London's poorest communities. It also risks undermining community cohesion and social integration. The Mayor favours To address these issues, the principle of proximity is supported as a general rule., but However , there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.5.45	S7 Paragraph 5.7.2	5.7.2 The re-use of graves can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them. The unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries.	Historic England	Clarification	Reassessment required to ensure the assessment, particularly the SEA, assess the heritage qualities of cemeteries.
ESC.5.46	S7 Paragraph 5.7.3	5.7.3 Ensuring that community and cultural facilities and services required to meet local needs are planned for and provided is one of the core principles of the planning system. Provision of facilities for cemeteries may not be inappropriate development in the Green Belt or on Metropolitan Open Land as long as it		Clarification	Minor change to wording, which has no consequences for the assessment.

		preserves the openness and does not conflict with the purposes of including land within it. The construction of new buildings in the Green Belt is inappropriate except for a limited number of uses. These include provision of appropriate facilities for cemeteries as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. This also applies to Metropolitan Open Land.			
ESC.5.47	S7 Paragraph 5.7.5	5.7.5 Boroughs should continue to make traditional burial provision but innovative approaches to the provision of community burial space, particularly in inner and central London, may also need to be taken.		Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 6 Economy					
ESC.6.1	E1 A	A Improvements to the competitiveness and quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.	City of London, Just Space, LB Islington, London Property Alliance, London Tenants Association.	Clarification	Reassessment required to ensure flexible and adaptable spaces are assessed to support different types of businesses.
ESC.6.2	E1 B	B Increases in the current stock of offices should be supported in the locations in Parts C and D below, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.	London First, LB Islington, Lewisham, Merton, Redbridge and Sutton; L&Q, Redrow Homes London, Silvertown Homes	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3	E1 C	C ... and other nationally-significant office locations (such as Tech City, and Kensington & Chelsea and the Royal Docks Enterprise Zones), should be developed and promoted...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4	E1 D	D The diverse office markets in outer and inner London (outside the areas identified in Part C CAZ and NIOD) should be consolidated and - where viable - extended...	LB Hackney	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5	E1 E	E Existing viable office floorspace capacity in outer and inner London locations outside the areas identified in Part C CAZ and NIOD should be retained...	LB Hackney, LB Merton	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6	E1 F	F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, the Royal Docks Enterprise Zones , Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7	E1 Paragraph 6.1.3	6.1.3 The projections indicate that the CAZ boroughs and some parts of inner London will continue to see growth in office employment and development of new office floorspace, driven by agglomeration economies, high value-added activities and viability of new space. There is broadly sufficient capacity to accommodate this demand in the CAZ and Northern Isle of Dogs ⁷³ complemented by Tech City and Kensington & Chelsea, although there are sub-markets within these areas where	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.

		demand may exceed capacity ⁷³ . with Stratford and Old Oak Common are identified as potential future reserves for CAZ-related office capacity.			
ESC.6.8	E1 Paragraph 6.1.6	6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1.96 million sqm of office space had received prior approval to change to residential by March 2018 ⁷⁴ mostly, but not exclusively, in town centres in west and south London and in areas around the CAZ fringe...		ctual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.9	E1 Paragraph 6.1.6	6.1.6 ... This Plan therefore supports boroughs to consult upon and introduce Article 4 Directions for the areas currently exempted in and around the CAZ (see Policy SD2 Collaboration in the Wider South East)...		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.10	E1 Paragraph 6.1.6	6.1.6 ... and for geographically-defined parts of other existing and viable strategic and local office locations clusters ,...	Jessica Ferm	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.11	E1 Paragraph 6.1.6	6.1.6 ... to ensure that their office functions are not undermined by office to residential PDR and to protect local amenity or the wellbeing of an area.	Ministry of Housing, Communities and Local Government and	Clarification	Reassessment required to ensure the local amenity and wellbeing of an areas is assessed.
ESC.6.12	E1 Paragraph 6.1.6A	Insert new paragraph 6.1.6A 6.1.6A Surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local development plan document). This evidence should be used to inform viability assessments.	Boroughs, London Councils, Federation of Small Businesses	Clarification	Additional supporting text, which has no consequences for the assessment.
ESC.6.13	E2 B	B Development proposals that involve the loss of existing B1 space (including creative and artists' studio workspace) in areas where there is an identified shortage of lower-cost space should:	London First, British Property Federation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.14	E2 B	<i>Combine B 2 and B 3 and add text from 6.2.4</i> B ...areas where there is an identified shortage of lower-cost space should: ... 2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, fit-out specification, use and size), incorporating existing businesses where possible, or . In exceptional circumstances where this is not feasible, it must be 3) demonstrated 3) — demonstrated that suitable alternative accommodation (in terms of type, fit-out specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.	Boroughs, London Councils, Berkeley Group, London Property Alliance	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.15	E2 C	C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local development plan document, should consider the	LB Camden, LB Enfield, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.

		scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.			
ESC.6.1 6	E2 Paragraph 6.2.1	<i>Amend text and move to paragraph 6.2.2</i> 6.2.1 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. Ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 7	E2 Paragraph 6.2.2	6.2.2 Low-cost business space refers to secondary and tertiary space that is available at open market rents , which is of a lower specification than prime space ...	Boroughs, London Assembly Planning Committee, London First, Ballymore	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 8	E2 Paragraph 6.2.2	<i>Add amended text from paragraph 6.2.1</i> 6.2.2 ... It usually commands rents at or below the market average. Ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents. Part B of Policy E2 supports the life-cycle of prime, secondary and tertiary business space over the longer term by securing the re-provision of capacity (at open market rents).	Ballymore, British Land, British Property Federation, CBI, CBRE Global Investing, Green Party Group, Landsec, L&Q, London First, London Forum of Amenity and Civic Societies, Redrow Homes, Royal London and Silvertown Homes	Clarification	Additional supporting text, which has no consequences for the assessment. Minor change to wording, which has no consequences for the assessment.
ESC.6.1 9	E2 Paragraph 6.2.4	<i>Move text to clause E2 B</i> 6.2.4 ... In Part B.2,3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. W what constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply...	LB Bexley, LB Camden, London Councils, Berkeley Group, London Property Alliance	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 0	E2 Paragraph 6.2.4	6.2.4 ... Where appropriate, R relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 1	E2 Paragraph 6.2.6	6.2.6 If business space is demonstrated to be obsolete or surplus to requirements (see paragraphs 6.1.6A and 6.7.4), it should be redeveloped for housing and other uses.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 2	E2 Paragraph 6.2.6	6.2.6... Evidence to assess the reasonable prospect of workspace being used for business purposes should include strategic and local assessments of demand and		Consistency	Minor change to wording, which has no consequences for the assessment.

		supply, and evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). This evidence should be used to inform viability assessments.			
ESC.6.2 3	E3 A	A ...Such circumstances include workspace that is: 1) dedicated for specific sectors that have social value such as charities or social enterprises 2) dedicated for specific sectors that have cultural value... 3) dedicated for disadvantaged groups starting up in any sector	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 4	E3 A 2	A ... Such circumstances include workspace that is:... 2) ...such as creative and artists' studios workspace, rehearsal and performance space and designer -makerspaces	City of London, Theatres Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 5	E3 A 4	A ... Such circumstances include workspace that is:... 4) supporting providing educational outcomes through connections to schools, colleges or higher education	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 6	E3 A 5	A ... Such circumstances include workspace that is:... 5) supporting start-up and early stage businesses or regeneration.	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 7	E3 B	B Particular consideration should be given to the need for affordable workspace for the purposes in part A above: 1) where there is existing affordable workspace on-site 2) in areas where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 8	E3 D	D Affordable workspace policies defined in Development Plans and the terms set out in Section 106 agreements should ensure include ways of monitoring that the objectives in part A above are monitored and achieved being met , including evidence that they space will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.2 9	E3 D	D ... Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured and managed efficiently.	LB Barnet, LB Brent	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.6.3 0	E3 F	F The affordable workspace elements of a mixed-use scheme should be operational, or have agreed finalised terms , prior to residential elements being occupied.	Workspace Providers Board, London Councils, LB Camden, LB Southwark, London First, London Property Alliance, Business for London, Canary Wharf Group, Crest Nicholson Plc, Dagenham Dock Ltd, Home Builders Federation, Get London Living, Notting Hill Housing Trust, Taylor Wimpey UK	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 1	E3 Paragraph 6.3.1	6.3.1 ...It can be provided and/or managed directly by a dedicated workspace provider , a public, private , charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 2	E3 Paragraph 6.3.3	6.3.3 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have cultural or social value such as artists, studios , designer-makers, spaces and charities and or social enterprises for which low-cost space can be important...	Workspace Providers Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 3	E3 Paragraph 6.3.3A	<i>Insert new paragraph 6.3.3A</i> 6.3.3A Social, cultural, or economic development objectives can be set in planning obligations, or by ensuring workspace providers are on a Local Authority framework panel or accredited list. Arrangements for engaging a provider, how the space will be owned or leased and the process for review, changes in terms, disposal or termination, should be agreed with the Local Planning Authority. When drawing up local development plan policies, boroughs are encouraged to draw on the experience of local workspace providers to understand the nature of demand in an area.	Workspace Providers Board	Clarification	Reassessment required to ensure social, cultural and economic objectives and engaging with providers is assessed.
ESC.6.3 4	E3 Paragraph 6.3.4	6.3.4 ...He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones (see Policy HC5 Supporting London's culture and creative industries) and promote schemes that provide linked affordable housing and business affordable workspace in new housing developments.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 5	E4 A	<i>Add text from E4 A 9)</i> A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained, taking into account strategic and local employment land reviews, industrial land audits and the	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide	Clarification	Minor change to wording, which has no consequences for the assessment.

		potential for intensification, co-location and substitution (see <u>Policy E7</u>)...	Pension Fund Trustee & National Grid UK Pension		
ESC.6.3 6	E4 A	A ...This should make provision for the varied operational requirements of: ...	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 7	E4 A 1	1) light and general industry industrial uses (Use Classes B1c and B2)	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 8	E4 A 2	2) storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points	Freight Transport Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.3 9	E4 A 3	3) secondary materials, and waste management and aggregates	Brett Group, East of England Local Government Association, Essex County Council, Freight on Rail, Rail Freight Group, Suffolk County Council, Tarmac	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 0	E4 A 4	4) utilities infrastructure (such as energy and water)	London Sustainability Exchange, PCS Trade Union	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 1	E4 A 9	<i>Move text to E4 A</i> 9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also <u>Policy E2 Low-cost business space</u>) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see <u>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>)	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 2	E4 A 10	10) Research and development of industrial and related products or processes (falling within Use Class B1b).	LB Lambeth, King's College Hospital	Clarification	Minor addition, which has no consequences for the assessment.

			NHS Foundation Trust		
ESC.6.4 3	E4 B 3	B London's land and premises for industry, logistics and services falls into three categories: ... 3) non-Designated Industrial Sites ⁷⁸ - see Policy E7 Part D below.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 4	E4 C New Footnote 78A	C The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial ^{78A} floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.... <i>Insert new footnote 78A</i> 78A Defined as the overall range of uses set out in Policy E4 Part A	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, SEGRO	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 5	E4 C	C ... Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 6	E4 D	D The retention, enhancement and provision of additional industrial capacity should be prioritised...	London Industrial and Logistics Sounding Board, Just Space, London Riverside BID, GLA Industrial BIDs Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 7	E4 D 4A	<i>Insert new clause 4A</i> D ... in locations that: ... 4A) support access to supply chains and local employment in industrial and related activities.	London Industrial and Logistics Sounding Board, Just Space, London Riverside BID, GLA Industrial BIDs Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 8	E4 H	H Development proposals for large-scale (greater than 2,500 sqm GEAGIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.	LB Bromley	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.4 9	E4 Paragraph 6.4.1	6.4.1 ... This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology...	Environmental Services Association	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.6.5 0	E4 Paragraph 6.4.4	6.4.4 Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was transferred released to other uses . This was well in excess of previously established London Plan monitoring benchmarks ⁸¹	Ballymore Group, Rockwell Property Limited	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 1	E4 Paragraph 6.4.5 Footnote 83	6.4.5 ...Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio ⁸³ whichever is the greater). <i>Amend footnote 83</i> ⁸³ Defined as total proposed industrial floorspace (see Part A), divided by the total proposed site area. Source: London Employment Sites Database, GLA Economics, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites	Amazon UK Services Limited, Ballymore Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 2	E4 Paragraph 6.4.5A	<i>Insert new paragraph 6.4.5A</i> 6.4.5A When applying this principle regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed. Mezzanine space should be excluded from calculations of industrial floorspace capacity.	Amazon UK Services Limited, LB Barking & Dagenham, LB Bexley, LB Southwark, London Industrial and Logistics Sounding Board, London Riverside BID, British Property Federation, Jessica Ferm, Freight Transport Association, L&Q, SEGRO, Silvertown Homes, UKWA, UPS, Vital OKR	Clarification	Reassessment required to ensure the use of yard space is assessed as an important industrial space.
ESC.6.5 3	E4 Paragraph 6.4.5B	<i>Insert new paragraph 6.4.5B</i> 6.4.5B The principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them. The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.	LB Harrow, Business for London, Jessica Ferm, SUEZ Recycling and Recovery UK Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 4	E4 Paragraph 6.4.8	6.4.8 There are three boroughs in the ' Limited Release ' category (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. These boroughs are encouraged to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand There is scope in these selected boroughs for limited release of industrial land in SIL and/or LSIS through a plan-led approach to reduce these vacancy rates and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach .	GLA Labour Group, LB Newham, Freight Transport Association, Jessica Ferm, UPS	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 5	E5 A	A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's largest concentrations main reservoirs of	Just Space, Green Party Group, Vital OKR	Clarification	Reassessment required to ensure how current vacant land, particularly in Thames Gateway, should be assessed and managed.

		industrial, logistics and related capacity for uses that support the functioning of London's economy.			
ESC.6.5 6	E5 B 1	B Boroughs, in their Development Plans, should: 1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in <u>Policy E7 Industrial intensification, co-location and substitution</u> and use the adopted Local Plan SIL boundary as the basis for decision-making)	RB Greenwich	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 7	E5 B 2	B Boroughs, in their Development Plans, should: 2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements to access, public transport, and digital connectivity and other related infrastructure) for the functions set out in part C	Federation of Small Businesses, LB Hounslow, London Forum of Civic and Amenity Societies, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group Olga Astaniotis, UKWA, Watford Borough Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 8	E5 C 4	C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below: 4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials, and waste management, aggregates , utilities infrastructure, land for transport and wholesale markets	Brett Group, East of England Local Government Association, Essex County Council, Freight on Rail, Rail Freight Group, Suffolk County Council, Tarmac	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.5 9	E5 C 5A	Insert new clause 5A C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:... 5A) research and development of industrial and related products or processes (falling within Use Class B1b)	LB Lambeth, King's College Hospital NHS Foundation Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 0	E5 Figure 6.2	<i>Update Figure 6.2</i>	LB Bromley	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 1	E6 A	A In their Development Plans, boroughs should: 1) Designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in <u>Policy E7 Industrial intensification, co-</u>	SEGRO, Vital OKR	Clarification	Minor change to wording, which has no consequences for the assessment.

		<u>location and substitution of land for industry, logistics and services to support London's economic function)</u> ...			
ESC.6.6 2	E7 Title	Policy E7 Industrial intensification, co-location and substitution of land for industry, logistics and services to support London's economic function		Amendment to make the policy title more concise	Reassessment required to ensure the use of yard space is assessed as an important industrial space.
ESC.6.6 3	E7 A 1	A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through: 1) development of mezzanines	London Industrial and Logistics Sounding Board, SEGRO	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 4	E7 A 5	A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through: ... 5) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.	Amazon UK Services Limited, LB Barking & Dagenham, LB Bexley, LB Southwark, London Industrial and Logistics Sounding Board, London Riverside BID, Jessica Ferm, Freight Transport Association, SEGRO, UKWA, UPS, Vital OKR	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 5	E7 B	B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified to provide additional industrial capacity . Intensification should can also be used to facilitate the consolidation of the an identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Allies and Morrison, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, RB Greenwich, SEGRO	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 6	E7 C	C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified to provide additional industrial capacity and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below...	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Allies and Morrison, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, Royal Borough of Greenwich, SEGRO	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.6.6 7	E7 D 2	D Mixed-use or residential development proposals on Non-Designated Industrial Sites should will be supported where: ... 2) it has been allocated in an adopted local D development P plan document for residential or mixed-use development on the basis of part D-1 ; or		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 8	E7 D 4	D ... be supported where: ... 4) suitable alternative accommodation (in terms of type, fit-out specification , use and size) is available in reasonable proximity to the development proposal...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.6 9	E7 E 3	E The processes set out in Parts B, C and D above must ensure that: 3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied	Berkeley Group, Home Builders Federation, Boroughs, London Councils, Ashia Centur Limited, BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension, Provewell Limited, PRP	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 0	E7 E 4 cA	<i>Insert new clause E 4 ca</i> E The processes set out in Parts B, C and D above must ensure that: ... 4) ... with particular consideration given to: ... cA) agent of change principles (see Policy D12 Agent of Change)	LB Haringey, LB Harrow, Aggregate Industries UK Ltd, Cemex UK Ltd, Sainsburys Supermarkets Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 1	E7 E 4 e	E The processes set out in Parts B, C and D above must ensure that: ... 4) ... with particular consideration given to: ... e) air quality, including dust, odour and emissions (see <u>Policy S11 Improving air quality</u> and <u>Policy S12 Minimising greenhouse gas emissions</u>) and potential contamination.	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 2	E7 F	F Development Plans and planning frameworks should consider, in collaboration with the GLA and neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:	LB Ealing, Enterprise M3 Local Enterprise Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 3	E7 Paragraph 6.7.1	6.7.1 In collaboration with the Mayor, all boroughs are encouraged to explore the potential to intensify industrial activities ⁸⁵ on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses	London Industrial and Logistics Sounding Board, London First, London Riverside BID, LB Newham, Ballymore Group, Allies and Morrison,	Clarification	Minor change to wording, which has no consequences for the assessment.

			East of England Local Government Association, Essex County Council, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, Roca Investments, Rockwell Property Limited, Royal Borough of Greenwich, Royal Borough of Kingston, SEGRO, Vital OKR		
ESC.6.7 4	E7 Paragraph 6.7.2 New Footnote 86A	6.7.2 Whilst the majority of land in SILs should be retained and intensified for the industrial-type functions set out in part C of <u>Policy E5 Strategic Industrial Locations (SIL)</u> , there may be scope for selected parts of SILs or LSISs to be consolidated. This should be done through a carefully co-ordinated plan-led approach (in accordance with parts B, C and E of <u>Policy E7^{86A} Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>) ... <i>Insert new footnote 86A</i> See also paragraphs 6.4.5 to 6.4.5B for the definition of industrial floorspace capacity	Ballymore Group, LB Barking & Dagenham	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 5	E7 Paragraph 6.7.2	6.7.2 ... to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the transfer release of some land for a mix of uses including residential.	Ballymore Group, Rockwell Property Limited	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 6	E7 Paragraph 6.7.2	6.7.2 ... Local Plan policies' maps and/or OAPFs and masterplans should indicate clearly: ...	Freight Transport Association, Home Builders Federation, RB Greenwich, Green Party Group, John Lewis Partnership, Just Space, Vital OKR	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.7 7	E7 Paragraph 6.7.2	6.7.2 ... (i) the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in <u>Policy E5 Strategic Industrial Locations (SIL)</u> and <u>Policy E6 Locally Significant Industrial Sites</u>) and (ii) the area to be removed released from SIL or LSIS (see illustrative examples in Figure 6.3)...	Ballymore Group, Rockwell Property Limited	Clarification	Minor addition, which has no consequences for the assessment.
ESC.6.7 8	E7 Paragraph 6.7.2	6.7.2 ... ii) the area to be removed released from SIL or LSIS (see illustrative examples in Figure 6.3). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.	Freight Transport Association, Home Builders Federation, RB Greenwich, Green Party Group,	Clarification	Minor change to wording, which has no consequences for the assessment.

			John Lewis Partnership, Just Space, Vital OKR		
ESC.6.7 9	E7 Paragraph 6.7.2A	Insert new paragraph 6.7.2A 6.7.2A These approaches may be supported by land swaps within the SIL or LSIS, within the borough or in collaboration with neighbouring authorities. To ensure that such development works effectively, there should be a development agreement in place between a residential and the industrial developer and associated (non-industrial) developers to support this process...	LB Harrow, LB Newham, London First, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group, Jessica Ferm, Prologis, SEGRO, Ashia Centur Limited	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 0	E7 Paragraph 6.7.2A	6.7.2A ...In order to follow the Fast Track Route (see Policy H4 Meanwhile use), industrial sites will need to meet the 50 per cent threshold for affordable housing.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 1	E7 Paragraph 6.7.3	6.7.3 Outside of areas designated as SIL or LSIS there may be opportunities to deliver co-location involving a mix of industrial and residential and/or other uses on the same site either side-by-side or through vertical stacking. ...	Allies and Morrison, Ballymore Group, LB Newham, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group, UKWA, Vital OKR	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 2	E7 Paragraph 6.7.4	6.7.4 Evidence to demonstrate ' no reasonable prospect ' of Non-Designated Industrial Sites being used for industrial and related purposes should include: <ul style="list-style-type: none"> strategic and local assessments of demand evidence of vacancy and marketing the site should have been marketed with appropriate lease terms and at market rates suitable for the type, use and size (for at least 12 months, or greater if required by a local development plan document), and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users... 	Federation of Small Businesses, RB Greenwich, Tate and Lyle Sugars	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 3	E7 Paragraph 6.7.6	6.7.6 ... This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses. Further advice on the implementation of Policy E7 will be provided in Supplementary Planning Guidance.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 4	E8 D	D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers institutions and other relevant research and innovation organisations should be encouraged.	London Higher, NUS, University of London	Consistency	Minor change to wording, which has no consequences for the assessment.

ESC.6.8 5	E8 E	E London's higher and further education providers institutions and their development across all parts of London should be promoted. ...	London Higher, NUS, University of London	Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 6	E8 GA	Insert new clause GA GA Boroughs are encouraged to identify and support the growth of sustainably-located employment clusters and sectors in inner and outer London.	LB Waltham Forest, London Stansted Cambridge Consortium, London Tenants Federation, Save Swiss Cottage, HFFTRA, Benhill Residents, Earls Court Public Sector Tenants' Association, individuals	Clarification	Minor addition, which has no consequences for the assessment.
ESC.6.8 7	E8 Paragraph 6.8.3 Point 2	6.8.3 ... These include: ... <ul style="list-style-type: none">• culture and creative industries – building on London's particular strengths in film, fashion and design, with clusters emerging across the city (including Creative Enterprise Zones – see Policy HC5 Supporting London's culture and creative industries), and the Mayor's vision to turn the Thames Estuary into a 'Production Corridor', developing facilities for artistic and creative production from East London to Southend and into Kent	Thames Gateway Kent Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 8	E8 Paragraph 6.8.3 Point 5	6.8.3 ... These include: ... <ul style="list-style-type: none">• low carbon and environmental goods and services sector – building on London's existing strengths in areas such as carbon finance, geothermal, wind energy, building technologies, alternative fuels, photovoltaics and waste management. The Mayor will support businesses to adopt the principles of the circular economy as set out in Policy S17 Reducing waste and supporting the circular economy. reducing waste and improving resource recovery and reuse The Mayor will also support the growth of London's CleanTech sector across London. ...	London Waste and Recycling Board	Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.8 9	E8 Paragraph 6.8.3 Point 5	6.8.3 ... These include: ... <ul style="list-style-type: none">• ... with the development of a major innovation campus by Imperial College London at White City, and the simultaneous redevelopment of Old Oak and Park Royal into a smart and sustainable district	Imperial College London	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 0	E8 Paragraph 6.8.4	6.8.4 The Mayor also supports measures to secure and develop London's leading role as a centre of higher and further education of national and international importance. London's higher and further education providers institutions have considerable potential for innovation supported by collaboration between businesses, the public	London Higher, NUS, University of London	Consistency	Minor change to wording, which has no consequences for the assessment.

		sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education providers institutions and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.			
ESC.6.9 1	E8 Paragraph 6.8.6A	Insert new paragraph 6.8.6A 6.8.6A Boroughs across London contain a rich variety of employment areas, including industrial estates, high streets and areas within and on the edge of town centres, which provide locations and opportunities for locally significant sectors and clusters of businesses. These are important for local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to identify these sectors and clusters and set out policies in Local Plans that support their growth in sustainable ways, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.	LB Waltham Forest, London Stansted Cambridge Consortium, London Tenants Federation, Save Swiss Cottage, HFFTRA, Benhill Residents, Earls Court Public Sector Tenants' Association, individuals	Clarification	Minor addition, which has no consequences for the assessment.
ESC.6.9 2	E9 BA	Insert new clause BA BA Development plans and development proposals should:	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 3	E9 BA 7	BA Development plans and planning proposals should: 7 support the range of London's markets in their full variety , including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 4	E9 C	C Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. ...	LB Barnet	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 5	E9 C	C ... Boroughs should also consider whether it is appropriate to carefully manage an the over-concentration of A5 hot food takeaway uses within Local, District and other town centres and other areas through the use of locally-defined thresholds in Development Plans.	Office of London CCGs PHE London	Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 6	E9 Paragraph 6.9.1	6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. Retailing is undergoing a period of continued restructuring in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet.	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 7	E9 Paragraph 6.9.3	6.9.3 ... Boroughs should plan proactively to accommodate that demand and manage the transition of surplus retail (including high street frontages, purpose-built shopping centres, malls and retail parks) to other	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.

		uses in line with this policy and Policy SD6 Town centres and high streets , Policy SD7-8 Town centre network , Policy SD8-7 Town centres: development principles and Development Plan Documents , while ensuring sufficient capacity for convenience retail to meet the day-to-day needs of local residents and Policy E9 Retail, markets and hot food takeaways .			
ESC.6.9 8	E9 Paragraph 6.9.4	6.9.4 ...extend choice and access to a range of goods, contribute to the vitality and viability of town centres and the character of high streets , and provide opportunities for new businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Columbia Road and Camden for example, and offer significant attractions for Londoners and visitors to the capital. Many markets have a specialist function, serving the shopping and leisure needs of a specific ethnic group, or providing speciality products and services. Whilst the planning system can help support the range of London's markets, broader actions are often required in terms of management and investment. The Mayor has established the London Markets Board to help ensure that markets continue to flourish, support growth in town centres and associated high streets, and remain vibrant attractions for all Londoners and visitors to the capital.	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, individuals	Clarification and consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.9 9	E9 Paragraph 6.9.5	6.9.5 ...The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions , particularly in town centres that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises ⁹²		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 00	E9 Paragraph 6.9.5	6.9.5 ... that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises ⁹² . Boroughs may require Health Impact Assessments for particular uses.	LB Camden, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 01	E9 Paragraph 6.9.7	6.9.7 ... Boroughs wishing to set a locally-determined boundary from schools should justify this using evidence provided by public health leads. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.	TCPA	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 02	E10 B	B The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.	Historic England	Clarification	Reassessment required to ensure the SEA assesses the conservation of heritage assets within this Policy.
ESC.6.1 03	E10 C & CA	<i>E10 C divided into clauses C and CA</i>			Restructuring, which has no consequences for the assessment.
ESC.6.1 04	E10 C	C A sufficient supply and range of serviced accommodation for business visitors should be maintained.	RB Kingston-upon-Thames, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 05	E10 CA	<i>Insert new clause CA</i> CA and † The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.6.1 06	E10 CB	<i>Insert new clause CB</i> CB Camping and caravan sites should be supported in appropriate locations.		Clarification	Minor addition, which has no consequences for the assessment.
ESC.6.1 07	E10 D	D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in the commercial-core other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see <u>Policy SD5 Offices, other strategic functions and residential development in the CAZ</u>), ...		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 08	E10 D	D ... and subject to the impact on strategic office space and other strategic functions. ...	Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 09	E10 D	D ... Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromises local amenity or the balance of local land uses.	LB Islington	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 10	E10 F	F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see <u>Policy H11 Ensuring the best use of stock</u>). Through development plan policies, boroughs may address impacts on local amenity caused by short-term lettings.	LB Newham, Marble Arch Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 11	E10 G 1	G To ensure sufficient choice for people who require an accessible bedroom..... 1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; OR	Just Space, LB Tower Hamlets, LB Camden, ARUP, The Access Association	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 12	E10 G 2	G To ensure sufficient choice for people who require an accessible bedroom... 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice .following requirements: a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use b) a further one room or one per cent, whichever is the greater, with a fixed tracked hoist system or similar system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting	Just Space, LB Tower Hamlets, LB Camden, ARUP, The Access Association	Factual update	Minor change to wording, which has no consequences for the assessment.

		<p>door to an adjoining (standard) bedroom for use by an assistant or companion</p> <p>c) — one room or five per cent, whichever is the greater with an en-suite shower room to meet the requirements of ambulant disabled people</p> <p>d) — four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layouts and be structurally capable of having grab rails installed quickly and easily if required.</p>			
ESC.6.1 13	E10 Paragraph 6.10.1	6.10.1 ... complemented by supporting infrastructure including visitor accommodation, a high-quality public realm, public toilets and measures to promote access by walking, cycling and public transport.			Minor change to wording, which has no consequences for the assessment.
ESC.6.1 14	E10 Paragraph 6.10.2	6.10.2 ... It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. In addition to leisure visitors, the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.	LB Islington	Clarification	Reassessment required to ensure the assessment, particularly the SEA, acknowledges the economic benefits certain visitor infrastructure could have for businesses in London.
ESC.6.1 15	E10 Paragraph 6.10.3	6.10.3 Boroughs in the CAZ are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas with smaller-scale provision in other commercial core areas of the CAZ. ...		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 16	E10 Paragraph 6.10.4	6.10.4 ...that the impact such provision can have on traditionally residential areas is addressed. In local Development Plan Documents, boroughs may seek to address issues such as over-concentration and servicing of short-term lets, to protect local amenity. ...	LB Newham, Marble Arch Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 17	E10 Paragraph 6.10.4	6.10.4 ... residential areas is addressed. In local Development Plan Documents, boroughs may seek to address issues such as over-concentration and servicing of short-term lets, to protect local amenity. ...	LB Newham, Marble Arch Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 18	E10 Paragraph 6.10.4	6.10.4 ...The use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand. The scale and nature of the use will determine whether planning permission is required. ...	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 19	E11 A	A The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps, ...	SEGRO, GLA Labour Group	Clarification	Reassessment required, particularly within the EqIA, to assess the impact of pay gaps on protected groups.

ESC.6.1 20	E11 A	A ...and as set out in his Skills for Londoners Strategy supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.	Cross River Partnership	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 21	E11 B	<i>E11 B divided into B1, B2 and B3</i>		Readability	Restructuring of the Plan, which has no consequences for the assessment.
ESC.6.1 22	E11 B	B Development proposals should seek to support employment...	TUC London, South East and East of England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.6.1 23	E11 B	B ... Boroughs should ensure these are implemented in ways that: (a1) enable trainees people undertaking training to complete their training and apprenticeships; (b2) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created, and (c3) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.	LB Newham	Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 7: Heritage and culture					
ESC.7.1	HC1 A	A This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of , the heritage assets, landscapes and archaeology within their area.	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2	HC1 B 4	B ...This knowledge should be used to inform the effective integration of London's heritage in regenerative change by: ... 4) delivering positive benefits that sustain- conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3	HC1 C	C ...Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.	Historic England, LB Enfield, LB Hillingdon	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4	HC1 Paragraph 7.1.1	7.1.1...London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.7.5	HC1 Paragraph 7.1.2	7.1.2 ...Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, and ancient woodlands, and aged or veteran trees	Natural England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.6	HC1 Paragraph 7.1.2	7.1.2 ... The distribution of designated assets differs across different parts of London, and is shown in Figure 7.1, Figure 7.2, Figure 7.3, Figure 7.4 and Figure 7.5 7.4 . Note that these maps are for illustrative purposes only.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.7	HC1 Paragraph 7.1.3	7.1.3 Ensuring the identification and sensitive management of London's heritage assets in tandem with promotion of the highest standards of modern architecture ...	Historic England, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.8	HC1 Paragraph 7.1.3	7.1.3 ... will be essential to maintaining the blend of old and new that gives-contributes to the capital's its unique character. ...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.9	HC1 Paragraph 7.1.4	7.1.4 ...London containing over 196,000 entries. In addition to utilising this record, boroughs' existing evidence bases, including character appraisals, conservation plans and local lists should be used as a reference point for plan-making and when informing development proposals.	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.10	HC1 Paragraph 7.1.5	7.1.5 ...Development Plans and strategies should demonstrate a clear understanding of the heritage values of a building , site, or area and its relationship with its surroundings.	London Forum of Amenity and Civic Societies, individual	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.11	HC1 Paragraph 7.1.5	7.1.5 ...stakeholders should include Historic England, boroughs, heritage specialists, as well as local communities and amenity societies .	Historic England, Brixton Society, Camden Town CAAC	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.12	HC1 Paragraph 7.1.6	7.1.6 ... it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. Policy D2 Delivering good design further addresses the issue of understanding character and context. Figure 7.4 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.		Relocated for clarity	Minor change to wording, which has no consequences for the assessment.
ESC.7.13	HC1 Paragraph 7.1.7	7.1.7 Heritage significance is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset's visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets. Development that affects the settings of heritage assets and their settings should respond positively to the assets' significance, local context and character, and to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.	Historic England, Blackheath Society	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.14	HC1 Figure 7.4	Move Figure 7.4 from HC1 to D2 Figure 7.4 — Outline Character Map of London		Relocated for clarity	Restructuring of Policy, which has no consequences for the assessment.

ESC.7.1 5	HC1 Figure 7.5	<i>Amend Figure number</i> Figure 7.5 7.4 - Archaeological Priority Areas and Registered Battlefield		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.7.1 6	HC2 Paragraph 7.2.1	7.2.1 ...In ratifying the World Heritage Convention, the UK Government has made a commitment to protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of and enhancing World Heritage Sites' and to protecting and conserving Outstanding Universal Value and their settings. Much of this commitment This duty is discharged by transferred to local authorities, including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.	Historic England, Westminster City Council	Clarification	Reassessment required to ensure the long-term protection of the OUV of WHS is assessed in the IIA.
ESC.7.1 7	HC2 Paragraph 7.2.3	7.2.3 The setting of London's World Heritage Sites consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the appreciation of a World Heritage Site's Outstanding Universal Value. As all four of London's World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding landscape. ...	West London River, Groups, Individuals, Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.1 8	HC2 Paragraph 7.2.3	7.2.3 ...Changes to the setting can have either an adverse, neutral or beneficial impact on the ability to appreciate the sites's Outstanding Universal Value...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.1 9	HC2 Paragraph 7.2.4	7.2.4 Policies protecting the Outstanding Universal Value of World Heritage Sites (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur. It is expected that the following boroughs' plans (including but not limited to the following) should contain such policies: ...	Westminster City Council, LB Bexley	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 0	HC2 Paragraph 7.2.4	7.2.4 ... City of London (Tower of London WHS); Royal Borough of Greenwich (Maritime Greenwich WHS); Hounslow (Royal Botanical Gardens Kew WHS); Lambeth (Westminster WHS); Lewisham (Maritime Greenwich WHS) ; Richmond (Royal Botanical Gardens Kew WHS); Southwark (Tower of London WHS, Westminster WHS); Tower Hamlets (The Tower of London WHS, Maritime Greenwich WHS);	Maritime Greenwich World Heritage Site, London Forum of Amenity and Civic Societies	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 1	HC3 A	A Strategic Views include significant buildings, or urban landscapes or riverscapes that help to define London at a strategic level. ...	Community Food Growers Network, The Northbank BID	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 2	HC3 Paragraph 7.3.1	7.3.1 ...development is likely to compromise the setting or visibility of a key landmark and should be resisted. The views that the Mayor has designated are listed in Table 7.1, with Figure 7.6 Figure 7.5 showing the indicative viewing locations of these designated views.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 3	HC3 Paragraph 7.3.5	7.3.5 The Mayor will work with boroughs and landowners of the Protected Vista viewing locations to ensure the viewing points are clearly identified. ...	Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 4	HC3 Paragraph 7.3.6	7.3.6 Clearly identifying important local views in Local Plans and strategies enables the effective management of development in and around the views. Where this has been done, these local views should be given the same degree of protection as Strategic Views.	National Trust London, RB Kensington and	Clarification	Minor change to wording, which has no consequences for the assessment.

			Chelsea, The Putney Society		
ESC.7.2 5	HC3 Figure 7.6	Figure 7.6 7.5 – Designated Strategic Views		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 6	HC4 A	A ...They should also preserve or and where possible enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks...	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 7	HC4 B	B Development in the foreground, and middle ground and background of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view.	Historic England, City of London Corporation, London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.2 8	HC4 Paragraph 7.4.1A	<i>Insert new paragraph 7.4.1A</i> 7.4.1A Development should make a positive contribution and where possible enhance the viewer's ability to recognise Strategically-Important Landmarks. Where existing buildings currently detract from or block the view, this should not be used as justification for new development to likewise exceed the threshold height of the Landmark Viewing Corridor.	Historic England	Clarification	Minor addition, which has no consequences for the assessment.
ESC.7.2 9	HC4 Paragraph 7.4.1B	<i>Insert new paragraph 7.4.1B</i> 7.4.1B Opportunities to reinstate Landmark Viewing Corridors arising as a result of redevelopment and demolition of existing buildings that exceed Landmark Viewing Corridor threshold height should be taken whenever possible.			Minor addition, which has no consequences for the assessment.
ESC.7.3 0	HC5 C 4	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 4) encourage the temporary use of vacant buildings (including heritage assets) and sites for creative workspace and activities	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 1	HC5 C 5	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 5) integrate public transport, digital and other infrastructure, and services provision such as...	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 2	HC5 C 5	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 5) ...leisure, recreation, education and community facilities in the establishment and development of the Creative Enterprise Zone	GLA Labour Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 3	HC5 Paragraph 7.5.1	7.5.1 London's rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. The vibrancy of London's culture is integrally linked to the diverse communities of the city, and grassroots venues and community projects are as important as	Just Space	Clarification	Reassessment required to ensure grassroots and community venues and projects are assessed in the IIA, particularly within the EqIA.

		London's famous cultural institutions in providing opportunities for all Londoners to experience and get involved in culture.			
ESC.7.3 4	HC5 Paragraph 7.5.1A	Insert new paragraph 7.5.1A 7.5.1A The capital's cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music, spectator sports , and other entertainment or performance venues, including pubs and night clubs. Although primarily serving other functions, the public realm, community facilities, places of worship , parks, and skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.	Community groups, Just Space, The Selby Trust, Stonewall Housing, London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 5	HC5 Paragraph 7.5.3	7.5.3 Despite this positive general picture, London's competitive land market means that the industry is struggling to find sufficient venues to grow and thrive, and is losing essential spaces and venues for cultural production and consumption including pubs, night-clubs , and music venues hosting live or electronic music and rehearsal spaces .	LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 6	HC5 Paragraph 7.5.4	7.5.4 Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces	Just space, community groups	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 7	HC5 Paragraph 7.5.5	7.5.5 The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, and support alternative cultural uses , particularly those with an evening or night-time use, and support consider nominations to designate them as Assets of Community Value	LB Camden Housing developers, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 8	HC5 Paragraph 7.5.6	7.5.6 Boroughs are also encouraged to support opportunities to use vacant buildings and land for flexible and temporary ' meanwhile uses ' or ' pop-ups ' especially for alternative cultural day and night-time uses. ...		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.3 9	HC5 Paragraph 7.6.7	7.6.7 ...The opportunity to incorporate these uses should be identified and facilitated through careful design and consideration of the impacts, for example on residents, visitors and biodiversity .	London Forum of Amenity and Civic Societies, LB Islington	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 0	HC5 Paragraph 7.5.12	7.5.12 ... CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of workspaces for artists and creative businesses.		Consistency	Minor change to wording, which has no consequences for the assessment.

ESC.7.4 1	HC5 Paragraph 7.5.13	7.5.13 ...and encouraging the temporary use of vacant buildings for creative uses. In developing policies and strategies for CEZs, boroughs should engage with local CEZ Consortiums, communities and businesses.	GLA Green Party Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 2	HC6 A New footnote 99A	A ...building on the Mayor's Vision for London as a 24-Hour City ^{99A} . <i>Insert new footnote 99A</i> https://www.london.gov.uk/what-we-do/arts-and-culture/arts-and-culture-publications/londons-first-ever-24-hour-vision	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 3	HC6 B 2	B In Development Plans, town centre strategies and planning decisions, boroughs should: ... 2) improve inclusive access, inclusion and safety, and make the public realm welcoming for all night-time economy users and workers	London Assembly Planning Committee	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 4	HC6 B 4	B In Development Plans, town centre strategies and planning decisions, boroughs should: ... 4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts issues for residents and nearby uses , and seek ways to diversify and manage these areas	LB Islington	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 5	HC6 Paragraph 7.6.1	7.6.1 The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses.	City of Westminster, business groups, Soho Society, Theatres Trust	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 6	HC6 Paragraph 7.6.2	7.6.2 ...However, 24-hour activities are not suitable for every part of London and its residents , and boroughs should balance the needs of local residents in all parts of London with the economic benefits of promoting a night-time economy.	LB Camden	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 7	HC6 Paragraph 7.6.4	7.6.4 Each night-time economy area will have its own character, which should be recognised and supported in order to maintain the rich diversity of London's night-time economy. ...	City of London Corporation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.4 8	HC6 Paragraph 7.6.6	7.6.6 There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and providing opportunities for social interaction, and making town centres safer by increasing activity and providing passive surveillance. ...	LB Camden	Clarification and readability	Reassessment required to ensure social benefits are assessed in the IIA, particularly within the HIA.
ESC.7.4 9	HC6 Paragraph 7.6.6	7.6.6 ...Managing issues such as transport, servicing , increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment.....	SEGRO	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 0	HC6 Paragraph 7.6.6	7.6.6 ... Boroughs are encouraged to consider appropriate management strategies and mitigation measures to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers, particularly in areas with high concentrations of licensed premises. ...	Residents' Association, Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.7.5 1	HC6 Paragraph 7.6.6 New Footnote 99B	7.6.6 ... Boroughs should consider applying for accreditation with schemes such as Purple Flag^{99B} which provide a standard of excellence in managing the night-time economy. <i>Insert new footnote 99B</i> https://www.atcm.org/purple-flag	London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 2	HC6 Paragraph 7.6.7	7.6.7 ...to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, cafés, restaurants, markets, community centres , libraries theatres and museums. ...	Community Food Growers' Network	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 3	HC6 Paragraph 7.6.9	7.6.9 ...This can help attract a wider more diverse range of visitors, including those who feel excluded from alcohol-based entertainment activities. ...	Community Food Growers' Network	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 4	HC6 Paragraph 7.6.10	7.6.10 ...This requires careful and co-ordinated management between a wide variety of stakeholders, including residents, in-order to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities. ...	Community Food Growers' Network	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 5	HC6 Paragraph 7.6.10	7.6.10 ... Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling.	London Wildlife Trust, Natural England, CPRE, individual	Clarification	Reassessment required to ensure noise, light and ecological impacts are assessed in the IIA, particularly within the SEA.
ESC.7.5 6	HC6 Paragraph 7.6.11	<i>Re-order text within paragraph 7.6.11</i> 7.6.11 Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. In recent years, many valued night-time venues have been lost, and this has disproportionately affected particular groups. There are also groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population...	Community Food Growers Network, Just Space	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 7	HC6 Paragraph 7.6.11	7.6.11 ...Boroughs should also work with land owners, investors and businesses to address perceived barriers to accessing the night-time economy and enhance the experience of London at night.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.7.5 8	HC6 Paragraph 7.6.11	7.6.11 ...This can include requiring new developments to provide accessible and gender-neutral toilets (see Policy S6 Public toilets),...	The Putney Society	Clarification	Reassessment required to ensure the support for specific groups is assessed in the IIA, particularly within the EqIA.

ESC.7.5 9	HC6 Paragraph 7.6.11 New Footnote 99C	7.6.11 ... supporting venues that serve specific groups (for example through the LGBT+ Venues Charter^{99C}) ... <i>Insert new footnote 99C</i> https://www.london.gov.uk/what-we-do/arts-and-culture/how-were-protecting-lgbt-nightlife-venues	UCL Urban Laboratory	Clarification	Reassessment required to ensure the support for specific groups is assessed in the IIA, particularly within the EqIA.
ESC.7.6 0	HC6 Paragraph 7.6.11	7.6.11 ...and working with local businesses, local communities , TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.	Community Food Growers' Network	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 1	HC6 Figure 7.7	<i>Amend Figure 7.7 to align with changes to Table A1.1 in Annex One</i>		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.7.6 2	HC7 A 1	A Boroughs should: 1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones		Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 3	HC7 A 2	A Boroughs should: ... 2) support proposals for new public houses where they would to stimulate town centres regeneration , Cultural Q quarters, the night-time economy and mixed-use development, taking into account potential negative impacts where appropriate.	Westminster City Council, Alliance for Childhood	Clarification and consistency	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 4	HC7 Paragraph 7.7.2	7.7.2 Through their unique and varied roles, pubs can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for existing and new communities, and meeting the needs of particular groups, such as the LGBT+ and BAME community communities. ...	Just space, community groups	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 5	HC7 Paragraph 7.7.3	7.7.3 Many pubs are popular because they have intrinsic character. This is often derived from their architecture, interior and exterior fittings , their long-standing use as a public house, their history, especially as a place of socialising and entertainment catering for particular groups...	Historic England, London Forum of Amenity and Civic Societies	Clarification	Minor change to Figure, which has no consequences for the assessment.

ESC.7.6 6	HC7 Paragraph 7.7.4	7.7.4 ...and any potential negative impacts. Boroughs should consider the replacement of existing pubs in redevelopment and regeneration schemes, particularly where their loss would have an impact on the local or wider community.	GLA Labour Group, LB Barnet	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 7	HC7 Paragraph 7.7.5	7.7.5 ...An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility. Boroughs should consider the listing of a pub as an ACV as a material consideration when assessing applications for a change of use and consider compulsory purchase orders where appropriate.	Campaign for Real Ale (CAMRA), LB Islington	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 8	HC7 Paragraph 7.7.7	7.7.7 ...The pub should have been marketed as a pub for at least 24 months as a pub at an agreed price following an independent valuation, ...		Readability	Minor change to Figure, which has no consequences for the assessment.
ESC.7.6 9	HC7 Paragraph 7.7.8	7.7.8 ...Boroughs are encouraged to should resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents (see Policy D12 Agent of change).	LB Camden, CAMRA	Clarification	Minor change to Figure, which has no consequences for the assessment.
Chapter 8 Green Infrastructure and Natural Environment					
ESC.8.1	G1 B	Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration to ensure green infrastructure is optimised. integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation	Natural England, Boroughs, The Environment Agency	Clarification	Reassessment required to determine the significance of removing reference to open space, flooding, health and wellbeing and biodiversity.
ESC.8.2	G1 CA	<i>Insert new clause CA</i> CA Development proposals should incorporate appropriate elements of green infrastructure into London's network of green and open space.	Individuals, Boroughs, London Sustainability Exchange	Clarification	Reassessment required to ensure the assessment address the development of a network of green and open spaces using green infrastructure.
ESC.8.3	G1 Paragraph 8.1.1	8.1.1 A green infrastructure approach recognises that the network of green and blue spaces, ...	Canal and River Trust, Boroughs	Clarification	Reassessment required to ensure that the blue network is considered in the assessment and issues surrounding education, heritage and health.
ESC.8.4		8.1.1 ...street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives. Objectives include promoting mental and physical health and wellbeing; ...		Clarification	Minor change to Figure, which has no consequences for the assessment.

ESC.8.5	G1 Paragraph 8.1.1	8.1.1 ...adapting to the impacts of climate change and the urban heat-island effect ;...	London Wildlife Network Trust, London Environment Directors Network, Boroughs	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.8.6	G1 Paragraph 8.1.1	8.1.1 ...improving air and water-quality; encouraging walking and cycling; supporting landscape and heritage conservation ; ...	Historic England	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.8.7	G1 Paragraph 8.1.1	8.1.1 ... learning about the environment ; ...	Parks for London, Trees & Design Action Group, Boroughs, London Forum of Amenity and Civic Societies.	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.8.8	G1 Paragraph 8.1.1	8.1.1 ... supporting food growing and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.	CFGN, London Food Link	Clarification	Minor change to Figure, which has no consequences for the assessment.
ESC.8.9	G1 Paragraph 8.1.2	8.1.2 All development takes place within a wider environment and green infrastructure should be seen as an integral element and not as an 'add-on'. It's economic and social value Should be recognised as has become increasingly evident across all of London at all scales and has been highlighted in the London i-Tree Assessment and the Natural Capital Account for London's Public Parks ¹⁰² .	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.10	G1 Paragraph 8.1.3	8.1.3 To help deliver on his manifesto commitment to make more than half of London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework - to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies.	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.11	G2 B	B The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported .		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.12	G2 Paragraph 8.2.2	8.2.2 ...This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, reducing the urban heat island effect and climate resilience		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.13	G2 Figure 8.1A	<i>Add Figure 8.1A – Green Belt and Metropolitan Open Land</i>		Clarification	Additional figure, which has no consequences for the assessment.
ESC.8.14	G3 B - D	<i>Reordering and renumbering of clauses B, C and D to AB, AC and AA respectively.</i>		Readability	Minor change to structure, which has no consequences for the assessment.
ESC.8.15	G3 AA + AB	D-AA Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area		Readability	Minor change to wording, which has no consequences for the assessment.

		<p>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</p> <p>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</p> <p>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</p> <p>B-AB The extension of MOL designations should be supported where appropriate.</p>			
ESC.8.1 6	G3 AC	<p>C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs; ensuring that the overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved, having regard to all of the criteria in Part B</p>	Landscape Institute London	Clarification	Reassessment required to ensure that not only the protection of MOL is considered, but also the overall quantum MOL is not reduced.
ESC.8.1 7	G3 Paragraph 8.3.1	<p>8.3.1 ...MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.</p>	London Food Link/ Sustain	Clarification	Reassessment required to ensure the assessment considers food growth, particularly within the HIA.
ESC.8.1 8	G4 Title	Policy G4 Local green and o open space.	Boroughs	Clarification	Minor change to structure, which has no consequences for the assessment.
ESC.8.1 9	G4	Amend and reorder Policy G4 by deleting A, amending C, inserting new clauses AA and AB, and renumbering B-D.			Minor change to wording, which has no consequences for the assessment.
ESC.8.2 0	G4 A	A Local green and open spaces should be protected.	Boroughs	Clarification	Minor change to structure, which has no consequences for the assessment.
ESC.8.2 1	G4 AA	<p>AA Development Plans should:</p> <p>C 1) Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required¹⁰⁵.</p> <p>E Development Plans and Opportunity Area Frameworks Should:</p> <p>1) 1A) Include appropriate designations and policies for the protection of open space to address deficiencies.</p> <p>B-2) 1B) promote the creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space particularly green space, ensuring that future green and open space needs are planned for in areas with the potential for substantial change.</p> <p>3) 1C) ensure that secured green and open space, particularly green space remains publicly accessible. needs are planned in</p>	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

		line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.			
ESC.8.2 2	G4 AB	Insert new clause AB and amend D to become a sub-clause of AB AB Development proposals should: 1) where possible create areas of publicly accessible open space, particularly in areas of deficiency. D—1A) resist the loss of protected green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better-quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.2 3	G4 Paragraph 8.4.1	8.4.1 Green and Open spaces, particularly those —planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London’s infrastructure. Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important. All types of open space, regardless of their function are valuable in their ability to connect Londoners to open spaces at the neighbourhood level. as they are the spaces which most Londoners use most often. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important and for improving wildlife corridors.	Boroughs, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.2 4	G4 Paragraph 8.4.2	8.4.2 Boroughs should undertake an green and open space needs assessment, which should be in-line with objectives in to inform their green infrastructure strategies (G1 Green Infrastructure) (drawing from existing strategies such as play, trees and playing pitches). These strategies and assessments should inform each other to deliver multiple benefits in recognition of the cross-borough nature of some forms of green infrastructure.	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.2 5	G4 Paragraph 8.4.3	8.4.3 The creation of new green or open space, particularly green space , is essential in helping to meet the Mayor’s long-term target of making more than 50 per cent of London green by 2050. New provision or improved public access should be particularly encouraged in areas of deficiency in access to public open space. It will also be is important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.2 6	G4 Paragraph 8.4.4	8.4.4 Proposals to enhance green and open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access for all , inclusive design, recreation facilities, habitat creation, landscaping improvement or Sustainable Drainage Systems (SuDS) flood storage.	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.2 7	G4 Table 8.1	Small Open Spaces	Boroughs, individuals	Clarification	Minor change to wording, which has no consequences for the assessment.

		These include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.			
ESC.8.2 8	G5 BA	Insert new clause BA... BA Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.	Boroughs, developers, campaign groups	Clarification	Additional wording, which has no consequences for the assessment.
ESC.8.2 9	G5 Paragraph 8.5.3	8.5.3 ...This is based on a review of green space factors in other cities ¹⁰⁶ . The factors outlined in Table 8.2 are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.	Boroughs, developers, campaign groups	Clarification	Additional wording, which has no consequences for the assessment.
ESC.8.3 0	G5 Paragraph 8.5.3A	Insert new paragraph 3.5.3A 8.5.3A ...Residential development places greater demands on existing green infrastructure, and as such, a higher standard is justified.	Boroughs	Readability and clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 1	G5 Table 8.2	Semi-natural vegetation (e.g. trees in natural soils woodland, species flower -rich grassland) maintained or established created on site.	Landscape Institute	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 2	G5 Table 8.2	Wetland or open water (semi-natural; not chlorinated) maintained or established created on site.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 3	G5 Table 8.2	Intensive green roof or vegetation over structure. Vegetated sections only . Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions ^A .		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 4	G5 Table 8.2	Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree – see Trees in Hard Landscapes for overview ^B .		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 5	G6 A	A Sites of Importance for Nature Conservation (SINCs) should be protected The greatest protection should be given to the most significant sites.	Natural England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.3 6	G6 B 1	B In developing Development Plan policies, boroughs should: 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and green ecological corridors to identify coherent ecological networks. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board	London Wildlife Trust	Clarification	
ESC.8.3 7	G6 B 3	B In developing Development Plan policies, boroughs should: ... 3) support the protection and conservation of priority species and habitats that sit outside of the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans. seek	London Wildlife Trust	Clarification	Reassessment required to ensure the IIA considers the protection of both designated and non-designated sites.

		opportunities to create habitats that are of particular relevance and benefit in an urban context			
ESC.8.3 8	G6 B 4	B In developing Development Plan policies, boroughs should:... 4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.	Natural England	Clarification	Reassessment required to ensure the IIA considers the protection of both designated and non-designated sites.
ESC.8.3 9	G6 B 5	B In developing Development Plan policies, boroughs should:... 5) ensure designated sites of European or national nature conservation importance are clearly identified and appropriately impacts assessed in accordance with legislative requirements.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.4 0	G6 BA	<i>Insert new clause BA</i> BA Where harm to a European Site or SSSI is unavoidable, a proposal must demonstrate that there are no alternatives and that there are Imperative Reasons of Overriding Public Interest (IROPI).		Consistency	Reassessment required to ensure the assessment incorporates improved clarity regarding when harm to a site may be considered acceptable
ESC.8.4 1	G6 C	C Where harm to a SINC (other than a European (International) designated site) is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy approach should be applied to minimise development impacts:...	London Wildlife Trust	Clarification	Reassessment required to ensure the assessment incorporates improved clarity regarding when harm to a site may be considered acceptable.
ESC.8.4 2	G6 C 1	C ... to minimise development impacts:... 1) avoid damaging adverse impact to the significant ecological features special biodiversity interest of the site		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.4 3	G6 C 2	C ... to minimise development impacts:... 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.4 4	G6 C 3	C ... to minimise development impacts:... 3) seek appropriate off-site compensation off-site based on biodiversity offsets, or other appropriate metric only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.		Consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.4 5	G6 D	D Development proposals should aim to secure net biodiversity gain and be informed by the best available ecological information which Biodiversity enhancement should be considered from the start of the development process.	Natural England	Clarification	Reassessment required to ensure net biodiversity gain is assessed rather than a general consensus to protect sites.
ESC.8.4 6	G6 E	E Proposals which create new or improved habitats that result in positive gains for biodiversity should be		Consistency	Minor change to wording, which has no consequences for the assessment.

		considered positively, as should measures to reduce deficiencies in access to wildlife sites should be considered positively.			
ESC.8.4 7	G6 Paragraph 8.6.1	<p>8.6.1 Sites of Importance for Nature Conservation (SINCs) comprise:</p> <p>1. — European sites (i.e. Special Protection Areas, Special Areas of Conservations (actual or candidate) and Ramsar sites)</p> <p>2. — National sites (i.e. National Nature Reserves, Sites of Special Scientific Interest)</p> <p>3. Sites of Metropolitan Importance – strategically-important conservation sites for London</p> <p>4. Sites of Borough Importance – sites which support habitats or species of value at the borough level</p> <p>5. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.</p> <p>N.b. Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see para 8.6.3)</p>	Natural England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.4 8	G6 Figure 8.1B	<i>Add Figure 8.1B – Designated nature conservation sites</i>		Clarification	Minor change, which has no consequences for the assessment.
ESC.8.4 9	G6 Paragraph 8.6.1A	<p><i>Insert new paragraph 8.6.1A</i></p> <p>8.6.1A The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCs across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.</p>	London Wildlife Trust, Environment Agency	Clarification	Reassessment to ensure the IIA considers that not all sites have equal weighting.
ESC.8.5 0	G6 Paragraph 8.6.1B	<p><i>Insert new paragraph 8.6.1B</i></p> <p>8.6.1B Sites with a formal European or national designation (including Special Protection Areas, Special Areas of Conservation, Sites of special scientific Interest, National Nature Reserves and Local Reserves) are protected by under their own legislation. There are legal provisions which ensure these sites are not harmed by development; there is a duty to consult Natural England on proposals that might affect these sites. For example, Special Protection Areas are protected under the EC Birds Directive and National Nature Reserves are protected under the Wildlife & Countryside Act 1981. The higher up the above hierarchy a SINC is placed, the more any harm to it should be avoided. Before compensatory provision is identified as the only solution to a European site conflict, it is necessary to demonstrate that there are no alternatives to the European site and that Imperative Reasons of Overriding Public Interest (IROPI) exist which justify why the project should proceed.</p>	London Wildlife Trust, Natural England	Clarification	Reassessment to ensure the IIA acknowledges the long-term, post-brexit implications to designated sites.

ESC.8.5 1	G6 Paragraph 8.6.2	<p><i>Add text from paragraph 8.6.5</i></p> <p>8.6.2 ...The wildlife value of these sites must be protected and appropriate maintenance regimes should be established to maintain or enhance the wildlife value of sites, recognising the additional pressure some sites may experience due to London's projected growth. Improved sustainable access to wildlife sites should be secured, where appropriate, so that Londoners can better experience and appreciate the natural environment within the city. The connections between protected sites – green corridors – are often critical in helping to sustain wildlife populations that would be vulnerable if they were confined to isolated areas of habitat. London's water spaces make up an important set of habitats in London. Policy SI17 Protecting London's waterways addresses the multi-functional use, protection and development of water spaces, with a particular priority for improving and restoring them sections of river. The habitat value of waterways is a key element of their future management.</p>		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 2	G6 Paragraph 8.6.3	8.6.3 ...The London Environment Strategy includes guidance on identifying SINC (Appendix 5) as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made.		Clarification and consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 3	G6 Paragraph 8.6.4	<p><i>Amend 8.6.4 and combine with paragraph 8.6.3.</i></p> <p>8.6.4—The London Wildlife Sites Board offers help and guidance to boroughs on the selection of SINC¹⁰⁷. The relevant procedures for identifying SINC are currently set out as Appendix 1 to the Biodiversity Strategy 2002, which will become an appendix to the final London Environment Strategy once adopted.</p>		Clarification and consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 4	G6 Paragraph 8.6.5	<p><i>Move text to paragraph 8.6.2</i></p> <p>8.6.5—London's water spaces make up an important set of habitats in London. Policy SI17 Protecting London's waterways addresses the multi-functional use, protection and development of water spaces, with a particular priority for improving and restoring sections of river. The habitat value of waterways is a key element of their future management.</p>		Clarification and consistency	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 5	G7 A	A Trees London's urban forest and woodlands should be protected, and maintained and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees	London Tree Officers Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 6	G7 B 1 New Footnote 107A	<p>B In their Development Plans, boroughs should:</p> <p>1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site^{107A}.</p>		Clarification	Additional supporting text, which has no consequences for the assessment.

		Insert new footnote 107A Forestry Commission/Natural England (2018): Ancient woodland and veteran trees: protecting them from development https://www.gov.uk/guidance/ancient-woodland-and-verteran-trees-prtoection-surveys-licences			
ESC.8.5 7	G7 C Footnote 108	C Development proposals should ensure that, wherever possible, existing trees of quality value are retained ¹⁰⁸ . If planning permission is granted that necessitates the removal of trees, if it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or other appropriate valuation system . The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy. <i>Amend footnote 108</i> Category A and , B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity , as defined by BS 5837:2012	London Tree Officers Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 8	G7 Paragraph 8.7.1	8.7.1 Trees and woodlands play an important role within the urban environment. They help to trap air pollutants, add to amenity , provide shading, absorb rainwater and filter noise. ...The Mayor and Forestry Commission, have produced a London Tree and Woodland Framework and Supplementary Planning Guidance on preparing tree strategies...	London Tree Officers Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.5 9	G7 Paragraph 8.7.1 Footnote 109	8.7.1 ... to help boroughs plan for the management of the urban forest ¹⁰⁹ . <i>Amend footnote 109</i> https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland Forestry Commission – London: https://www.forestry.gov.uk/London-policy		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 0	G7 Paragraph 8.7.1	8.7.1These, and their successor documents , should inform policies and proposals in be part of boroughs' wider green infrastructure strategies.			Minor change to wording, which has no consequences for the assessment.
ESC.8.6 1	G7 Paragraph 8.7.2	8.7.2 The Mayor wants to increase tree canopy cover in London by 10 per cent by 2050. ...When preparing more detailed planning guidance boroughs are also advised to refer to sources such as Right Trees for a Changing Climate ¹¹⁰ and guidance produced by the Trees and Design Action Group ¹¹¹ , a multi-disciplinary cross-partnership forum seeking to promote urban forests.	London Tree Officers Association	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 2	G8 A	A In Development Plans, boroughs should: 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments or as a meanwhile use on vacant or under- utilised sites	London Food link	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.8.6 3	G8 Paragraph 8.8.2	8.8.2 As provision for small-scale food growing becomes harder to deliver, innovative solutions to its delivery should be considered, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in community schemes such as in new schools. Where sites are made available for food growing on a temporary basis landowners/ developers will need to be explicit over how long sites will be available to the community.	Landscape Institute	Clarification	Reassessment required to ensure the assessment considers that new and existing schools should be encouraged to grow food.
ESC.8.6 4	G9 B	B Where relevant , development proposals should:	London Geodiversity Partnership	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 5	G9 Paragraph 8.9.2	8.9.2 National planning policy is clear that boroughs should protect, promote and enhance geodiversity. London's geodiversity sites are shown in Figure 8.1....	London Geodiversity Partnership	Clarification.	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 6	G9 Paragraph 9.2	8.9.2 ...Geodiversity sites with existing or proposed European or national designations are Sites of Special Scientific Importance Interest and subject to statutory protection. Boroughs should protect and enhance RIGSs and LIGSs through their Development Plans....	London Wildlife Trust	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 7	G9 Paragraph 8.9.4	8.9.4 Where appropriate, access for all should be provided to geodiversity sites, although it is recognised that this is not always desirable. Geological sites will require appropriate maintenance regimes to ensure that these assets are properly protected and managed.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.8.6 8	G9 Figure 8.1	<i>Renumber Figure 8.1 due to previous addition</i> Figure 8.18.2 – Geodiversity site		Consistency	Minor change to wording, which has no consequences for the assessment.
Chapter 9 Sustainable Infrastructure					
ESC.9.1	SI1 A 1 & 2	A 1) D development proposals should not... 2) D development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.9.2	SI1 A 3	A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced: 3) The development of large-scale redevelopment areas, such as Opportunity Areas and masterplans and development briefs for large-scale development proposals these subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development.	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		All other developments should be at least Air Quality Neutral.			
ESC.9.3	SI1 A 3A	<p>Insert new clause SI1 3A</p> <p>A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:..</p> <p>3A Major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.</p>	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.4	SI1 A 4	A 4) D development proposals must demonstrate how they plan to comply with...		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.9.5	SI1 A 5	<p>A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:</p> <p>5) Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.</p>		Consistency within the Plan- consequential adjustment following on from new Part A4.	Restructuring of wording, which has no consequences for the assessment.
ESC.9.6	SI1 A 6	A 6) D development proposals should ensure that where emissions need to be reduced, this is done on-site...			Minor change to wording, which has no consequences for the assessment.
ESC.9.7	SI1 Paragraph 9.1.1	9.9.1 ... The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts. The Mayor is committed to making air quality in London the best of any major world city, which means not only meeting and maintaining legal limits for Nitrogen Dioxide as soon as possible but also working to achieve World Health Organisation targets for other pollutants such as Particulate Matter.	London Boroughs	Clarification	Reassessment required to ensure the support of WHO targets and long-term aims are assessed in the IIA.
ESC.9.8	SI2 A	<p>A Major development should be net zero-carbon. This means reducing carbon dioxide greenhouse gas emissions from-in construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:</p> <p>1) Bbe lean: use less energy and manage demand during construction and operation.</p> <p>2) Bbe clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.</p>	Boroughs, community groups (London Tenants), LETI, London First, Individuals, Boroughs (Camden, H&F) Green Party, Friends of the Earth, Just Space, Solar Trade Assoc. Individuals	Clarification and consistency within the plan	Minor change to wording, which has no consequences for the assessment.

		Development in Heat Network Priority Areas should follow the heating hierarchy in <u>Policy SI3 Energy infrastructure</u>. 3) B be green: maximise opportunities for renewable energy by generate-producing, storing and using renewable energy on-site			
ESC.9.9	SI2 A 3A	A 3A) Be seen: monitor, verify and report on energy performance.	LETI, UKGBC, Solar Trade Assoc. Boroughs (Merton, Southwark, Greenwich, Sutton, Ealing, Camden) LSDC, Hornsey & Wood Green Labour, Ashden, Levitt Bernstein, BWB consulting, Fuel Poverty Action, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.10	SI2 B	B Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and will be expected to monitor and report on energy performance.	LETI, UKGBC, Solar Trade Assoc. Boroughs (Merton, Southwark, Greenwich, Sutton, Ealing, Camden) LSDC, Hornsey & Wood Green Labour, Ashden, Levitt Bernstein, BWB consulting, Fuel Poverty Action, Individuals	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.11	SI2 C	C In meeting the zero-carbon target a A minimum on-site reduction of at least 35 per cent beyond Building Regulations ¹¹⁷ is expected required for major development . Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either: 1) through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or 2) off-site provided that an alternative proposal is identified and delivery is certain.	Ashden, LETI, Boroughs (Ealing, Greenwich), Boroughs (Merton), Green Party, Putney Society, ACE, London First, Southern Housing Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12	SI2 D	D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas carbon reductions. The		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.

		operation of offset funds should be monitored and reported on annually.			
ESC.9.13	SI2 DA	<i>Insert new paragraph SI2 DA</i> DA Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.	London First, Canary Wharf Group, Clarion Housing Group, CIBSE, British Property Federation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.14	SI2 DB	<i>Insert new paragraph SI2 DB</i> DB Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.	LETI, UKGBC, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification	Reassessment required to ensure the use of whole life-cycle approach is fully assessed by the IIA.
ESC.9.15	SI12 Figure 9.2	<i>figure 9.2 amended to show 'be seen' stage</i>	LETI	Clarification	Minor change to figure, which has no consequences for the assessment.
ESC.9.16	SI2 Paragraph 9.2.4	9.2.4 A zero-carbon target for major residential developments has been in place for London since October 2016 and applies to. This target will be extended to include major non-residential developments from 2019. on final publication of this Plan (expected 2019).		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.17	SI2 Paragraph 9.2.5A	<i>Insert new paragraph 9.2.5A</i> 9.2.5A The Mayor recognises that Building Regulations use outdated carbon emission factors and that this will continue to cause uncertainty until they are updated by Government. Further guidance on the use of appropriate emissions factors will be set out in the Mayor's Energy Planning Guidance to help provide certainty to developers on how these policies are implemented.		Clarification	Minor addition, which has no consequences for the assessment.
ESC.9.18	SI2 Paragraph 9.2.6	9.2.6 Developments are expected to achieve carbon reductions beyond part L from energy efficiency measures alone to reduce energy demand as far as possible. Residential development should aim to achieve 10 per cent and non-residential development should aim to achieve 15 per cent over part L.	Ashden, LETI, Boroughs (Ealing, Greenwich)	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.19	SI2 Paragraph 9.2.7	9.2.7... However, offset funds do have the potential to unlock carbon savings from the existing building stock through energy efficiency programmes and by installing renewable technologies – typically more expensive to deliver in London due to the building age, type and tenure.		Readability	Minor change to wording, which has no consequences for the assessment

ESC.9.20	SI2 Paragraph 9.2.9	9.2.9... Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA...		Readability	Minor change to wording, which has no consequences for the assessment
ESC.9.21	SI2 Paragraph 9.2.9A	<i>Insert new paragraph 9.2.9A</i> 9.2.9A Operational carbon emissions will make up a declining proportion of a development's whole life carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach is needed to capture its unregulated emissions (i.e. those associated with cooking and small appliances), its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials, and construction) and emissions associated with maintenance and eventual material disposal). Whole life-cycle carbon emission assessments are therefore required for development proposals referable to the Mayor. Major non-referable development should calculate unregulated emissions and are encouraged to undertake whole life-cycle assessments.	LETI, UKGBC, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification	Reassessment required to ensure the use of whole life-cycle approach is fully assessed by the IIA.
ESC.9.22	SI2 Paragraph 9.2.10	9.2.10... As a minimum, energy strategies should contain the following information: a. A calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions), at each stage of the energy hierarchy. b. Proposals to reduce carbon dioxide emissions beyond Building Regulations through the energy efficient design of the site, buildings and services, whether it is categorised as a new build, a major refurbishment or a consequential improvement. c. Proposals to further reduce carbon dioxide emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources. (Development in Heat Network Priority Areas should follow the heating hierarchy in <u>Policy SI3 Energy infrastructure</u>).		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment

ESC.9.23	SI2 Paragraph 9.2.10	9.2.10 d. Proposals to further reduce carbon dioxide emissions through-by maximising opportunities to produce the generation and use of on-site renewable energy on-site , utilising storage technologies where appropriate.	Boroughs (Camden, H&F) Green Party, Friends of the Earth, Just Space, Solar Trade Assoc. Individuals	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.24	SI2 Paragraph 9.2.10	9.2.10 h. A plan for monitoring and annual reporting of Proposals for how energy demand and carbon dioxide emissions post-construction will be monitored annually (for at least five years).		Clarification and readability	Minor change to wording, which has no consequences for the assessment
ESC.9.25	SI2 Paragraph 9.2.10	9.2.10 k. Proposals to minimise the embodied carbon in construction A whole life-cycle carbon emissions assessment, and actions to reduce life-cycle carbon emissions (for development proposals referable to the Mayor).	LETI, UKGBC, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification	Reassessment required to ensure the use of whole life-cycle approach is fully assessed by the IIA.
ESC.9.26	SI3 B 3	B... 3) major heat supply plant including 4) possible opportunities to utilise heat from energy from waste plants ...	CIBSE, Boroughs (H&F), GLA Labour Group, London Waste and Recycling Board, North London Waste Authority	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.27	SI3 B 11A	<i>Insert new clause SI3 B 11A</i> 11A) opportunities to maximise renewable electricity generation and incorporate demand-side response measures.	London Sustainability Exchange, LETI, LSDC, Individuals, Hoare Lea LLP, Siemens, Solar Trade Association, Friends of the Earth, Ashden	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.28	SI3 D	Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system	SEWPAG, Arup, CIBSE	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.29	SI3 D 1	D1... b) use available zero-emission or local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system) c) generate clean heat and/or power from zero-emission sources...		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.30	SI3 D 1	D1... d) use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)...		Clarification and readability	Minor change to wording, which has no consequences for the assessment

ESC.9.31	SI3 D 1	D1... e) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network) (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)	Boroughs (H&F, City of London) LEDNet, ClientEarth	Clarification and readability	Reassessment required to understand how removing the reference to air quality will change the assessment.
ESC.9.32	SI3 D 2	D2 CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements of policy SI1 (A) there is no significant impact on local air quality.	Environment Agency	Consistency within the Plan	Reassessment required to understand how removing the reference to air quality will change the assessment.
ESC.9.33	SI3 Paragraph 9.3.2	9.3.2... Decentralised energy will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs.		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.34	SI3 Paragraph 9.3.2A	<i>Insert new paragraph 9.3.2A</i> 9.3.2A Many of London's existing heat networks have grown around combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of national grid electricity decarbonising, and there is increasing evidence of adverse air quality impacts. Heat networks are still considered to be an effective and low-carbon means of supplying heat in London, and offer opportunities to transition to zero-carbon heat sources faster than individual building approaches. Where there remains a strategic case for low-emission CHP systems to support area-wide heat networks, these will continue to be considered on a case by case basis.		Clarification	Minor addition, which has no consequences for the assessment
ESC.9.35	SI3 Paragraph 9.3.3	9.3.3... Data relating to new and expanded networks will be regularly captured and made publicly available Major development proposals outside Heat Network Priority Areas should select a low-carbon heating system that is appropriate to the heat demand of the development, provides a solution for managing peak demand and avoids high energy bills for occupants.		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.36	SI3 Paragraph 9.3.5	9.3.5... The Mayor also supports the development of low-temperature networks for both new and existing systems as this allows cost-effective use of low-grade waste heat. It is expected that network supply temperatures will drop from the traditional 90°C-95°C to less than 70°C depending on system design. Further guidance on designing and operating heat networks will be set out in the updated London Heat Network Manual.	LETI	Clarification	Minor change to wording, which has no consequences for the assessment

ESC.9.37	SI3 Paragraph 9.3.6	9.3.6 Further information about the relevance of CHP in developments of various scales will also be provided in the Energy Planning Guidance document, which will be kept updated as technology changes. However, it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available. Low-emission CHP in this policy refers to those technologies which inherently emit very low levels of NOx. It is not expected that gas engine CHP will fit this category with the technology that is currently available. Further details on circumstances in which it will be appropriate to use low-emission CHP and what additional emissions monitoring will be required will be provided in further guidance. This guidance will be regularly updated to ensure that it reflects changes in technology.		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.38	SI3 Paragraph 9.3.7	9.3.7 Increasing the amount of new renewable energy sources in London developments is supported and development proposals should identify opportunities to maximise renewable energy production on-site. This includes the use of energy from waste schemes that are connected to a heat network, as well as solar photovoltaics, heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London. Innovative low- and zero-carbon technologies will also be supported.	LB Hammersmith and Fulham	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.39	SI3 Paragraph 9.3.8	9.3.8... switch to electricifying heating systems (such as through heat pumps)... Energy masterplans are expected to identify any necessary electricity infrastructure.		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.40	SI3 Paragraph 9.3.10	9.3.10 National Grid Cadent Gas and Southern Gas Networks SGN operate London's gas distribution network. Both companies are implementing significant gasholder de-commissioning programmes , replacing them with smaller gas pressure reduction stations...		Factual update	Minor change to wording, which has no consequences for the assessment
ESC.9.41	SI3 Figure 9.3	Heat Network Priority Areas and Heat Density in London Relative heat demand based on fuel use kWh/m ² /year Remove layer showing areas where legal air quality limits are exceeded, and remove from key		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.42	SI4 A	A Development proposals should minimise internal heat gain and the adverse impacts on of the urban heat island through design, layout, orientation, and materials and the incorporation of green infrastructure....	Environment Agency, Natural England, Boroughs (H&F, Lewisham, Greenwich, Sutton, Kent CC), CIBSE Green Party, Businesses (Twinn Sustainability), Trees	Clarification	Minor change to wording, which has no consequences for the assessment

			and Design Action Group, landscape Institute		
ESC.9.43	SI4 B	B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.44	SI4 B	<i>Reordering of clauses B 1 & 2</i>	CIBSE	Clarification	Minor change to structure, which has no consequences for the assessment
ESC.9.45	SI4 B 2	B2) reduce the amount of heat entering a building through orientation, shading, high albedo materials , fenestration, insulation and the provision of green roofs and walls infrastructure	Environment Agency, Natural England, Boroughs (H&F, Lewisham, Greenwich, Sutton, Kent CC), CIBSE Green Party, Businesses (Twinn Sustainability), Trees and Design Action Group, landscape Institute	Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.46	SI4 Paragraph 9.4.1	9.4.1... This, combined with a growing population, urbanisation and the urban heat island effect, means that London must manage heat risk in new developments, using the cooling hierarchy set out above.		Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment
ESC.9.47	SI4 Paragraph 9.4.2	9.4.2... These circumstances can lead many people to feel too hot or not be able to sleep, but for those with certain health conditions, and 'at risk' groups such as some young or elderly Londoners, the effects can be serious and worsen health conditions be potentially lethal . Green infrastructure-roofs can provide some mitigation of this effect by shading roof surfaces and through evapotranspiration. Development proposals should incorporate green infrastructure in line with Policies G1 Green infrastructure and G5 Urban greening.	Environment Agency, Natural England, Boroughs (H&F, Lewisham, Greenwich, Sutton, Kent CC), CIBSE Green Party, Businesses (Twinn Sustainability), Trees and Design Action Group, landscape Institute	Clarification and Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment
ESC.9.48	SI4 Paragraph 9.4.3	9.4.3 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. Single-aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and should normally be avoided in line with Policy D4 Housing quality and standards. There are a number of low-energy intensive measures that can mitigate overheating risk . These include solar shading, building orientation and solar-controlled glazing. These include solar shading, building orientation and solar-controlled glazing. Occupant behaviour will also have an impact on overheating risk. The Mayor's London Environment	CIBSE, Boroughs (Brent) Max Fordham LLP, Ashden, Individuals	Consistency within the Plan	Minor change to wording, which has no consequences for the assessment

		Strategy sets out further detail on actions being taken to address this.			
ESC.9.49	SI4 Paragraph 9.4.4	9.4.4 Passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution. The increased use of air conditioning systems is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. Therefore, passive ventilation should be prioritised...	CIBSE, Boroughs (Merton, Southwark) Barratts	Clarification	Reassessment required to ensure noise and air quality impacts are assessed, particularly within the SEA and HIA.
ESC.9.50	SI4 Paragraph 9.4.5	9.4.5... TM 59 should be used for domestic developments and TM 52 should be used for non-domestic developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life. The GLA's Energy Planning Guidance provides further information will be provided in guidance on how these guidance documents and datasets should be used		Clarification	Minor change to wording, which has no consequences for the assessment
ESC.9.51	SI5 C New footnote 124A	C Development proposals should:... 2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category^{124A} or equivalent (commercial development) 3) be encouraged to incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing. <i>Insert new footnote 124A</i> Achieve at least a 12.5% improvement over defined baseline performance standard	LB Sutton, Hoare Lea, Developers, LB Lewisham, LB Enfield, City of London	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.52	SI5 D	D In terms of water quality, Development Plans should:... 2) support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts...	Thames Water	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.53	SI5 EA	<i>Insert new clause SI5 EA</i> EA Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.	Environment Agency, Thames Water, London Assembly, Green Party, Just Space, LB Lewisham	Clarification	Additional text, which has no consequences for the assessment.
ESC.9.54	SI5 Paragraph 9.5.1	9.5.1 Londoners consume on average 156 149 litres of water per person per day – around 47 8 litres above the national average...		Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.9.55	SI5 Paragraph 9.5.4	9.5.4 Thames Water has set out in its draft Water Resources Management Plan its preferred approach to Variations of the following four strategic water supply options to		Factual update	Minor change to wording, which has no consequences for the assessment. However, this addition will be included in the contextual review.

		<p>serve London and parts of the Wider South East. are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London: These include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> • direct river abstraction from the Thames linked to augmenting river flows using treated sewage works effluent in east and west London • treatment / re-use of effluent from sewage treatment works likely within London <input type="checkbox"/> • desalination potentially within London <input type="checkbox"/> • transfer of river water from the River Severn to the River Thames catchment • a new reservoir – likely to be near the Upper Thames in Oxfordshire. 			
ESC.9.56	SI5 Paragraph 9.5.5	<p>9.5.5 The Mayor is reviewing has reviewed the available information on each of the supply options alongside evidence of their impacts on Londoners and Mayoral priorities. A strategic approach to water supply networks to ensure future water resilience and in particular the timely planning for a new strategic water resource to serve London and the Wider South East is important. In preparing its Water Resource Management Plans, Thames Water is exploring has explored coordinated supply options with the other water companies serving London and the South East of England through the Water Resource South East expert group. Water Resource East is undertaking has undertaken similar work in the East of England area. A more strategic approach to water supply networks is supported to ensure future water resilience. All this will involves partnership working with key stakeholders within London and beyond its boundaries.</p>		Clarification	Reassessment required to incorporate water resilience into the assessment.
ESC.9.57	SI5 Paragraph 9.5.8	<p>9.5.8 In relation to wastewater and improvements to the water environment, Water Framework Directive requirements should be maintained through the Thames River Basin Management Plan and the Catchment Plans prepared by the Catchment Partnerships, of which there are 12 in London. These Partnerships share lessons, experiences and best practice, and help achieve a coordinated approach to delivering the Thames River Basin Management Plan. Development Plans should be supported by evidence, which demonstrates that the development planned for</p> <ul style="list-style-type: none"> a. will not compromise the Thames River Basin Management Plan objective of achieving 'Good' status, or cause deterioration in water quality; and b. will be supported by adequate and timely provision of wastewater treatment infrastructure. 	London boroughs, Environment Agency	Consistency within the Plan And Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.9.58	SI15 Paragraph 9.5.10	9.5.10 The Thames Tideway Tunnel is under construction and will help to improve the water quality of the River Thames by significantly reducing the frequency of untreated sewage being discharged into the Thames (known as combined sewer overflows). Thames Water is also planning a major sewer tunnel in the Counters Creek catchment of west London. Sustainable drainage measures are of particular importance in areas with sewer capacity limitations and their widespread implementation over the coming decades will help the resilience of London and avoid the need for further major sewer tunnel projects. Thames Water is taking a long-term approach to drainage and wastewater management planning. Its London 2100 plan will identify the most appropriate strategy for ensuring London's drainage and wastewater systems can meet the needs of London over the next 80 years in the most sustainable way.	RB Kensington & Chelsea, LB Hammersmith & Fulham, Thames Water	Factual correction and update	Minor change to wording, which has no consequences for the assessment. However, this addition will be included in the contextual review.
ESC.9.59	SI5 Paragraph 9.5.12	9.5.12 Integrated Water Management Strategies should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk. Development Plans and proposals should demonstrate that they have considered the opportunities for integrated solutions to water-related constraints and the provision of water infrastructure within strategically or locally defined growth locations. These could be Opportunity Areas or growth locations defined in Local Plans. Where such opportunities are identified, development plans should require an integrated and collaborative approach from developers. This could for example lead to the establishment of local water reuse systems or integrated drainage networks. Integration with the planning of green infrastructure could deliver further benefits.	Environment Agency	Clarification	Additional wording, which has no consequences for the assessment.
ESC.9.60	SI5 Paragraph 9.5.13	9.5.13 A water advisory group with representatives from across the water sectors in London has been established to advise the Mayor and share information on strategic water and flood risk management issues across the capital .	LB Hillingdon, RB Kensington & Chelsea	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.61	SI5 Paragraph 9.5.14	9.5.14... The modelling does not consider how waste water is routed through the network, so it should be noted that some 'green' areas will flow into 'red' areas and hence increasing flows upstream will exacerbate performance in the downstream catchments. The hatched area on the map shows the portions of the sewer system that are generally combined sewers, which means they capture both waste water and surface water flows.		Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.
ESC.9.62	SI6 A 1	A To ensure London's global competitiveness now and in the future, development proposals should: 1) achieve greater digital connectivity than set out in part R1 of the Building Regulations	Home Builders Federation, Many developers and home builders	Clarification	Minor deletion, which has no consequences for the assessment.

ESC.9.63	SI6 A 2	A To ensure London's global competitiveness now and in the future, development proposals should: 2) ensure that sufficient ducting space for future-digital full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users	London Sustainability Exchange	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.64	SI6 A 3	A To ensure London's global competitiveness now and in the future, development proposals should: 3) meet requirements expected demand for mobile connectivity within generated by the development and	Persimmon Homes	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.65	SI6 A 3	A To ensure London's global competitiveness now and in the future, development proposals should: 3A) take appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.66	SI6 A 4	A To ensure London's global competitiveness now and in the future, development proposals should: 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.	Mobile UK	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.67	SI6 Paragraph 9.6.3	9.6.3 Better digital connectivity with a focus on capability , affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the capital. The specific requirements of business clusters, such as a symmetrical- capable service with the same upload and download speeds, should also be met.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.68	SI6 Paragraph 9.6.4	9.6.4 Given the fast pace at which digital technology is changing, a flexible approach to development is needed that supports innovation and choice . Part R1 of the Building Regulations 2010 requires buildings to be equipped with high-speed (at least 30 MB/s) ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure could can achieve connectivity speeds closer to of 1GB/s. Developers should engage early with a range of network operators, and development proposals need to be appropriately designed to be capable of providing this level of connectivity to all end users. Mechanisms should also be put in place to enable further future infrastructure upgrades. Innovation is driving reductions in the size of infrastructure, with marginal additional unit costs, but greater digital connectivity is needed in more locations.		Clarification and consistency within the plan	Minor change to wording, which has no consequences for the assessment.
ESC.9.69	SI6 Paragraph 9.6.4A	9.6.4A Development proposals should also demonstrate that mobile connectivity will be available throughout the development and should not have detrimental impacts on	Mobile UK	Clarification	Reassessment required to ensure the assessment includes both digital and mobile connectivity.

		the digital connectivity of neighbouring buildings. Early consultation with network operators will help to identify any adverse impact on mobile or wireless connectivity and appropriate mitigation measures to avoid/mitigate them.			
ESC.9.70	SI6 Paragraph 9.6.4B	9.6.4B Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm.	Mobile UK	Clarification	Reassessment required to ensure the assessment includes both digital and mobile connectivity.
ESC.9.71	SI6 Paragraph 9.6.5	9.6.5... (see <u>Policy E4 Land for industry, logistics and services to support London's economic function</u> , <u>Policy E5 Strategic Industrial Locations (SIL)</u> , <u>Policy E6 Locally Significant Industrial Sites</u> and <u>Policy E7 Industrial intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>).		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.72	SI6 Paragraph 9.6.6	9.6.5 The Mayor will work with providers network operators , developers, councils and Government to develop guidance and share good practice to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion, in particular through his 'not-spot' Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their digital strategies or corporate plans.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.73	SI6 Paragraph 9.6.7	9.6.7 Digital connectivity supports smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, resource including water and energy consumption, waste , air quality, noise and congestion...	London Waste and Recycling Board	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.74	SI7 A 1	A Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to: <ol style="list-style-type: none"> 1) promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible 2) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products 3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026 4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste: 	LWarB, ESA, LWPF, SEWPAG, EEWTAB	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>a) municipal waste¹²⁷ – 65 per cent by 2030</p> <p>b) construction, and demolition and excavation waste – 95 per cent by 2020</p> <p>5) designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.</p>			
ESC.9.75	SI7 Paragraph 9.7.3	<p>9.7.3... The Mayor is committed to meeting or exceeding the recycling targets for each of the following waste streams, and to generating low-carbon energy in London from suitable remaining waste:...</p> <p><input type="checkbox"/> •construction, and demolition and excavation waste – 95 per cent recycling by 2020</p>	LWPF, SEWPAG, EEWTAB	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.76	SI7 Paragraph 9.7.3A	<p><input type="checkbox"/> <i>Insert new paragraph 9.7.3A</i></p> <p><input type="checkbox"/> 9.7.3A Modelling suggests that if London achieves the reduction and recycling set out above, it will have sufficient Energy from Waste capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational.</p>	N/ LWPF, Environment Agency	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.77	SI7 Paragraph 9.7.4A	<p><input type="checkbox"/> <i>Insert new paragraph 9.7.4A</i></p> <p>9.7.4A It is recognised that the particular characteristics of excavation waste are such that it is extremely difficult to recycle this waste stream. Therefore the target in Policy SI7A has been amended to apply to Construction and Demolition waste only.</p>	LWPF, Environment Agency	Clarification	Reassessment required to ensure the assessment considers that excavation waste cannot be recycled as easily as other wastes, and therefore some aspects of this policy do not apply to this waste stream.
ESC.9.78	SI7 Paragraph 9.7.6	<p>9.7.6 Further guidance on Circular Economy Statements will be produced. These Circular Economy Statements are intended to cover the construction phase of development.</p>	SEWPAG, Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.79	SI8 B 3	<p><input type="checkbox"/> B3 Development Plans should:...</p> <p>3) identify the following as suitable locations to manage borough waste apportionments:...</p> <p>b) Strategic Industrial Locations and Locally Significant Employment Sites Land</p>		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.9.80	SI8 Paragraph 9.8.1	<p><input type="checkbox"/> 9.8.1... The bulk of this waste is CD&E waste. Approximately 1.3mt of waste was exported overseas. The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation</p>	London Boroughs, LWPF	Clarification	Additional wording, which has no consequences for the assessment.

		waste. The particular characteristics of this waste stream mean that it will be very challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream.			
ESC.9.81	SI8 Paragraph 9.8.3	9.8.3... Therefore, sufficient sites should be identified within London to deal with the equivalent of 100 per cent of the waste apportioned to the boroughs as set out in Table 9.2. Boroughs will also need to ensure sufficient sites are provided for those waste streams they have to deal with that the London Plan does not set out apportionments for, with the exception of excavation waste. The Mayor will work with boroughs, the London Waste and Recycling Board, and the London and neighbouring Regional Technical Advisory Bodies to address cross-boundary waste flow issues. An example of joint working would be the on-going need to address the issues around excavation waste.	London Boroughs, LWPF, EEWTAB, SEWPAG	Clarification	Reassessment required to ensure the assessment considers that excavation waste cannot be recycled as easily as other wastes, and therefore some aspects of this policy do not apply to this waste stream.
ESC.9.82	SI8 Paragraph 9.8.6	9.8.6... Boroughs are encouraged to collaborate by pooling their apportionment requirements. Boroughs with a surplus of waste sites should offer to share these sites to those boroughs facing a shortfall in capacity before considering site release.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.83	SI8 Paragraph 9.8.13	9.8.13 Examples of the 'demonstrable steps' required under part D3 of <u>Policy SI8 Waste capacity and net waste self-sufficiency</u> are: <ul style="list-style-type: none"> <input type="checkbox"/> • Aa commitment to source truly residual waste – waste with as little recyclable material as possible. <input type="checkbox"/> • Aa commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure to meet the minimum CO₂ standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency. <input type="checkbox"/> • Aa n agreed timeframe (via a Section 106 agreement) as to when proposed measures will be delivered. <input type="checkbox"/> • The establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority. 			Minor change, which has no consequences for the assessment.

ESC.9.84	SI9 Paragraph 9.9.2	9.9.2... When assessing the throughput of a site, the maximum throughput achieved over the last three five years should be used.	London Waste Planning Forum, Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.85	SI9 Paragraph 9.9.3	9.9.3... If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period...	SEWPAG, EEWTAB	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.86	SI10 A	A An adequate supply of aggregates to support construction in London will be achieved by: 1) encouraging re-use and recycling of construction, and demolition and excavation waste within London... 4) meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and recycling 50 per cent of that waste as aggregates by 2020.	LAWP	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.87	SI10 B 1	B 1) Development Plans should make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won aggregates up to 2041, in particular through a landbank apportionment of: 1a) at least 1.75 mt to London Borough of Havering 2b) at least 0.7 mt to London Borough of Redbridge 3c) at least 1.75 mt to London Borough of Hillingdon 4d) at least 0.7 mt to London Borough of Hounslow.	LAWP	Clarification	Minor change, which has no consequences for the assessment.
ESC.9.88	SI10 B 2	<i>Insert new clause SI10 B 2</i> B 2) ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregate to London.			Reassessment to ensure the assessment considers the protection of sites for the importation of aggregates.
ESC.9.89	SI10 B 3	<i>Insert new clause SI10 B 3</i> B 3) support the production of recycled aggregate and, where practicable, expand capacity at/or adjacent to aggregate wharves and rail depots and quarries during their operational life, within or adjacent to major construction projects.			Reassessment to ensure the assessment considers the protection of sites for the importation of aggregates.
ESC.9.90	SI10 C	C All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.	LAWP	Clarification	Minor change to wording, which has no consequences for the assessment.

		<p>1. Sand and gravel resources from development that would otherwise sterilise future potential extraction</p> <p>2. All types of facilities identified in paragraph 143 of the NPPF.</p>			
ESC.9.91	SI10 D	<p>D To reduce the environmental impact of aggregate facilities, Development Plans should:...</p> <p>2A) ensure planning conditions are imposed on new aggregate facilities so that noise, dust and traffic impacts are effectively controlled.</p> <p>2B) ensure new development in proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle.</p>	LAWP	Clarification	Reassessment required to ensure air quality and noise issues are considered, particularly within the HIA.
ESC.9.92	SI11 Paragraph 9.11.4	<p>9.11.4 In addition to avoiding or mitigating adverse construction and operational impacts (noise, dust, visual intrusion, vehicle movements and lighting, on both the natural and built environment, including air quality and the water environment), any fracking proposal would need to take full account, where relevant, of the following environmental constraints:...</p> <p><input type="checkbox"/> • Ggroundwater or surface water</p>			Minor change to wording, which has no consequences for the assessment.
ESC.9.93	SI12 B	<p>B Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan-Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks...</p>	LB Bexley, Thames Regional Flood and Coastal Committee	Factual update and clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.94	SI12 C	<p>C Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.</p>	LB Bexley	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.95	SI12 F	<p>F Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Where possible Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set permanent built development back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.</p>	Environment Agency, Several London boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.9.96	SI12 FA	Insert new clause SI12 FA FA Natural flood management methods should be employed in development proposal due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.	Environment Agency, Natural England, Several London boroughs	Clarification	Reassessment required to ensure the assessment incorporates the use of natural flood management methods, particularly within the SEA and HIA.
ESC.9.97	SI12 Paragraph 9.12.1	9.12.1 In London, the boroughs are Lead Local Flood Authorities (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a register of flood risk management assets register . They identify areas of flood risk to help inform appropriate locations for development produce Local Flood Risk Management Strategies . LLFAs should cooperate on strategic and cross-boundary issues.	LB Greenwich	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.98	SI12 Paragraph 9.12.3	9.12.3 The Environment Agency's Thames Estuary 2100 Plan (TE2100), published by the Environment Agency, and endorsed by Government , focuses on a partnership approach to tidal flood risk management...	Environment Agency	Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.99	SI12 Paragraph 9.12.4	9.12.4 The concept of Lead Local Flood Authorities producing Riverside Strategies was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment...	Environment Agency, LB Newham	Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.9.100	SI12 Paragraph 9.12.5	9.12.5 The Environment Agency's Thames River Basin District Flood Risk Management Plan is part of a collaborative and integrated approach to catchment planning for water. Measures to address flood risk should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Natural flood risk management in the upper river catchment areas can also help to reduce risk lower in the catchments. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments	Environment Agency, LB Hillingdon	Clarification	Additional text, which has no consequences for the assessment.
ESC.9.101	SI12 Paragraph 9.12.6	9.12.6 In terms of mitigating residual risk , it is important that a strategy for resistance and then resilience including safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services...	LB Greenwich, LB Hillingdon	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.102	SI12 Paragraph 9.12.7	9.12.6 Development adjacent to flood defences will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost-effective way.		Readability	Minor deletion, which has no consequences for the assessment.
ESC.9.103	SI13 A	A Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface	LB Merton	Clarification	Minor change to wording, which has no consequences for the assessment.

		water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.			
ESC.9.10 4	SI13 B	B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy. There should also be a preference for green over grey features: <ol style="list-style-type: none"> 1) rainwater use as a resource (for example rainwater harvesting, (including a combination of green and blue roofs for irrigation) 2) rainwater infiltration to ground at or close to source techniques and green roofs 3) rainwater attenuation in open water green infrastructure features for gradual release (for example green roofs, rain gardens) 4) rainwater discharge direct to a watercourse (unless not appropriate) 5) rainwater attenuation above ground (including blue roofs) 6) rainwater attenuation below ground¹³⁶ 7) controlled rainwater discharge to a surface water sewer or drain 8) controlled rainwater discharge to a combined sewer. 	Environment Agency, London boroughs	Clarification	Reassessment required to ensure the use of green features is incorporated into the assessment, particularly the SEA.
ESC.9.10 5	SI13 C	C Development proposals for impermeable paving should be refused where appropriate unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.	London boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.10 6	SI13 D	D Drainage should be designed and implemented in ways that address issues promote multiple benefits including increased of water use efficiency, improve river water quality, and enhance biodiversity, urban greening , amenity and recreation.	Environment Agency, Natural England, LB Southwark, LB Hillingdon	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.10 7	SI13 Paragraph 9.13.1	9.13.1 London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place . Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from sewers, drains multiple sources including surface water, and groundwater, and run-off from land and small watercourses that occurs as a result of heavy rainfall.	LB Tower Hamlets, LB Newham, LB Hammersmith & Fulham	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.10 8	SI13 Paragraph 9.13.2	9.13.2 Development proposals should aim to get as close to greenfield run-off rates ¹³⁷ as possible depending on site conditions. The well-established drainage hierarchy set out in this policy		Clarification	Minor change to wording, which has no consequences for the assessment.

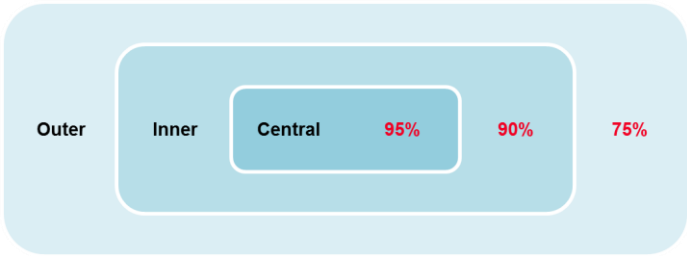
		helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. and it There should be a preference for green over grey features, and drainage by gravity over pumped systems...			
ESC.9.109	SI13 Footnote 137	The runoff that would occur from a site in undeveloped natural state.			Minor change to wording, which has no consequences for the assessment.
ESC.9.110	SI13 Paragraph 9.13.3	9.13.3... This should include suitable pollution prevention filtering measures, ideally by using soft engineering or green infrastructure. In addition, if direct discharge is to a watercourse where the outfall is likely to be affected by tide-locking, suitable storage should be designed into the system...	Environment Agency	Clarification	Reassessment required to ensure the assessment considers green infrastructure offerings, particularly within the SEA.
ESC.9.111	SI14 BA	<i>Insert new clause SI14 BA</i> BA Development Plans and development proposals should seek to maximise the multifunctional benefits waterways provide.	LB Sutton, Regents Network, local community groups	Clarification	Reassessment required to ensure the assessment acknowledges the multiple benefits waterways have, particularly within the HIA and SEA.
ESC.9.112	SI14 Paragraph 9.14.1	9.14.1... This network of linked waterways – also known as the Blue Ribbon Network - is of strategic importance for London. Every London borough contains some waterways – 17 border the Thames and 15 contain canals (see Figure 9.6)	LB Hillingdon, Canal & Rivers Trust, London Parks & Gardens Trust, London Wildlife Trust, Regents Network, Just Space	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.113	SI14 Figure 9.6 (title)	Figure 9.6 - London's Network of Waterways (the Blue Ribbon Network)		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.114	SI14 Paragraph 9.14.2	9.14.2 London's waterways are multifunctional assets . They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and as well as drainage, flood and water management and urban cooling functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners and play a key role in place making of neighbourhoods. They also provide a home for Londoners living on boats. The waterways They are protected and their water-related use - in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity - is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames. In addition to the Thames, other water spaces, and in particular canals, have a distinct value and significance for London and Londoners.	LB Sutton, Regents Network, Canal & River Trust, Local community groups	Clarification	Reassessment required to ensure the urban cooling affect waterways offer is addressed, particularly within the HIA.
ESC.9.115	SI14 Paragraph 9.14.4	9.14.4 The River Thames is a strategically-important and iconic feature of London. It is a focal point for London's identity reflecting its heritage, natural and landscape values as well as	Historic England	Clarification	Minor change to wording, which has no consequences for the assessment.

		cultural opportunities. Its character changes on its way through London...			
ESC.9.11 6	SI14 Paragraph 9.14.6	9.14.6 Joint Thames Strategies should cover:... <ul style="list-style-type: none"> opportunities for environmental/ecological and urban design improvements... river crossings and other structures 	London Wildlife Trust, Environment Agency	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.11 7	SI14 Paragraph 9.14.8	9.14.8 Additional stretches of the River Thames should not be designated as Metropolitan Open Land, as this may restrict the use of the river for transport infrastructure related uses.	LB Richmond, Historic England, Kew Society, Regents Network, West London River Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.11 8	SI14 Paragraph 9.14.9	9.14.9... The South East Inshore Marine Plan is currently under development as part of a suite of Marine Spatial Plans ¹³⁹ under the Marine Policy Statement...	Marine Management Organisation	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.11 9	SI15 B	B ...Alternative use of a boatyard site should only be accepted if the facilities of the site are re-provided at a site with equivalent or enhanced facilities in Greater London . Proposals for a new strategic-scale boatyard site, at an appropriate site within London, will be supported.	London Forum of Amenity & Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 0	SI15 C	C Development proposals to facilitate an increase in the amount of freight transported by river on London's waterways should be supported.	Regents Network, Cemex Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 1	SI15 F	F Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on the reactivation of wharves which are currently not handling freight by water, will be supported.	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 2	SI15 Paragraph 9.15.2	9.15.2 The PLA and Transport for London's Pier Strategy will promote extending river services to East London and its growth areas to encourage modal shift to the river. This will relieve road congestion and better integrate other forms of transport such as walking and cycling.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 3	SI15 Paragraph 9.15.5	9.15.5... The Mayor will regularly review wharf safeguarding to ensure the changing need for waterborne freight is addressed. Where the transition of wharves from waterborne freight to other uses is acceptable, the re-use of those wharves for waterborne public transport use should be considered.	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 4	SI16 AA	AA Development proposals for should protect and enhance, where possible, water-related cultural, educational and community facilities and events, and new facilities should be supported and promoted, but should take into consideration the protection and other uses of the waterways.		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.9.12 5	SI16 AB	AB Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation or on the protection of the waterway (see Policy SI17 Protecting and enhancing the London's waterways).	London Wildlife Trust, LB Tower Hamlets, LB Newham	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 6	SI16 D	D New mooring facilities should be: Development proposals adjacent to waterways should protect and enhance, where possible, existing moorings. The provision of new moorings and required facilities should be supported and promoted, if they are	LB Enfield, National Barge Travellers Association	Clarification	Reassessment required to ensure the enhancement of existing moorings, in addition to new moorings, is assessed
ESC.9.12 7	SI16 D 1	D 1) supported as part of development proposals, but should be off-line from main navigation routes, in basins or docks, unless there are no negative impacts on navigation or on the protection of the waterway (see Policy SI17 Protecting and enhancing London's waterways)	London Wildlife Trust, LB Tower Hamlets, LB Newham	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 8	SI16 D 1A	D 1A) appropriately designed including the provision of wash mitigation, where necessary	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.12 9	SI16 E	E Major development schemes adjacent to waterways should consider the provision of new moorings.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 0	SI16 G	G Development proposals along waterways should protect and enhance inclusive public access to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways.		Minor change to wording, which has no consequences for the assessment.	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 1	SI16 H	H Development proposals should improve and expand the Thames Path and the towpaths, improve alignment with the waterway where relevant, enhance them as walking routes, and provide better linkages to the transport network...		Consistency within the Plan	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 2	SI16 Paragraph 9.16.1	9.16.1 New development should utilise the waterways (also known as the Blue Ribbon Network) for transport purposes where possible, but also for active water-based leisure, and for informal waterside recreation or access. In order to make the maximum use of London's waterways a range of supporting infrastructure is required including jetties, moorings, slipways, steps and waterside paths and cycleways (piers, wharves and boatyards are addressed in Policy SI15 Water transport)...	LB Hillingdon, Canal & Rivers Trust, London Parks & Gardens Trust, London Wildlife Trust, Regents Network, Just Space	Clarification and readability	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 3	SI16 Paragraph 9.16.2	9.16.2 Moorings and moored boats are an integral part of the character of the waterways. There has been a significant increase in the number of boats on London's waterways (from 2,000 in 2010 to 5,000 in 2016), with a notable increase in central and eastern parts of London's canal network. There is a deficit of residential, leisure, visitor and commercial moorings and required facilities (such as power, water, and waste disposal) to meet the increase in demand. The Canal and River Trust is producing a London Mooring Strategy which will provide an overview of the number of people living on boats on the canal network. It will identify zones for potential additional moorings. Some community-based projects to create residential moorings may be considered as	LB Enfield, National Barge Travellers Association, Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.

		community-led housing (part A.4 of Policy H2 Small sites). In addition, a number of creative businesses such as artists' studios and post-production facilities are located on boats. Development proposals for residential moorings in particular should consider innovative solutions to address site-specific conditions, including wash, to enable the creation of new appropriate moorings without detrimentally impacting on navigation.			
ESC.9.13 4	SI16 Paragraph 9.16.3	9.16.3 Historic steps and slipways to the Thames foreshore are vital for enabling access for-to/from activities and events. The Thames Path and the towpaths are particularly important in terms of providing safe access for a large number of Londoners along the waterways, facilitating their enjoyment of the river as well as providing health and wellbeing benefits as walking routes...	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 5	SI16 Paragraph 9.16.4	9.16.4 Complementing development proposals for cultural facilities and events, the Mayor s is producing, in partnership with the Port of London Authority, a case for a Cultural Strategy Vision for the River Thames . It aims to increase Londoners' engagement with the River for culture and leisure purposes , including an increase in night-time use and engagement with focusing on under-used areas. It also provides information on the heritage and importance of the River Thames and its banks to London's cultural life, especially in Opportunity Areas .		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 6	Policy SI17 Title	Protecting and enhancing London's waterways		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.13 7	SI17 AA	<i>Insert new clause SI17 AA</i> AA Development Plans should support river restoration and biodiversity improvements.	London Wildlife Trust	Clarification	Reassessment required to ensure the benefits river restoration and biodiversity improvements are assessed.
ESC.9.13 8	SI17 A	A Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, the floodplain, riparian and adjacent terrestrial habitats, water quality as well as and increase the heritage and habitats value, should be supported if appropriate . Development proposals to impound and constrain narrow waterways should be refused.	London Wildlife Trust, Environment Agency	Clarification and readability	Reassessment required to ensure the benefits river restoration and biodiversity improvements are assessed.
ESC.9.13 9	SI17 B	B Development proposals should support and improve the protection of the distinct open character and heritage of waterways and their setting .	LB Enfield	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.14 0	SI17 C	C Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses or to support enhancements of water-related purposes .	Berwin Leighton Paisner LLP	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.14 1	SI17 D	D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, and environment and	London Wildlife Trust, LB Sutton, Regents Network	Clarification	Reassessment required to ensure the benefits river restoration and biodiversity improvements are assessed and to consider the social and economic

		biodiversity and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.			benefits of water assets, particularly within the SEA and HIA.
ESC.9.14 2	SI17 E	E On-shore power at water transport facilities should be provided considered at wharves and residential moorings to help reduce air pollution.	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.9.14 3	SI17 Paragraph 9.17.2	9.17.2... The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised. The waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.	West London River Group	Clarification	Reassessment required to assess how the policy protects waterways and does not result in a continuous line of moored crafts.
ESC.9.14 4	SI17 Paragraph 9.17.3	9.17.3... This includes the requirement in this policy to provide consider providing on-shore power at wharves and moorings.	Port of London Authority	Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 10 Transport					
ESC.10.1	T1 A	A Development Plans and development proposals should support and facilitate ...	London Cycling Campaign	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.2	T1 Paragraph 10.1.1	10.1.1... In order to help facilitate this, an integrated strategic approach to transport is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use, which the policies in the Plan and the Mayor's Transport Strategy seek to deliver , London cannot continue to grow sustainably.			Minor change to wording, which has no consequences for the assessment.
ESC.10.3	T1 Paragraph 10.1.3	10.1.3 The Mayor will work with partners to minimise servicing-and delivery freight trips on the road network including through consolidation...		Consistency – within the Plan	Minor change to wording, which has no consequences for the assessment.

ESC.10.4	T1 Paragraph 10.1.5	<p>10.1.5 Rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, will require sustained investment including improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing. Achieving this is expected to result in different outcomes in different places, including modal splits in central, inner and outer London, as shown by Figure 10.1.</p>		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.5	T1 Figure 10.1A	<p><i>Insert new figure Figure 10.1A</i></p> <p>Figure 10.1A Mode shares in central, inner and outer London expected to be required for a city-wide 80 per cent share for walking, cycling and public transport</p> 			Minor addition, which has no consequences for the assessment.
ESC.10.6	T2 C	<p>C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport travel. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.</p>		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.7	T2 Paragraph 10.2.2	<p>10.2.2 This Plan supports the implementation of the Mayor's Transport Strategy which aims to deliver the infrastructure and public realm required to significantly increase levels of walking, cycling and public transport use throughout London. It aims to make the city more accessible, inclusive and welcoming to all, so that every Londoner can be active every day, creating a healthier city, inclusive of for people from all backgrounds, ensuring inequalities are reduced.</p>	Just Space, The Access Association, Inclusive Design and Access Panel	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.10.8	T2 Paragraph 10.2.3	<p>10.2.3 The Healthy Streets Approach is an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. It supports the delivery of the Mayor’s aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day needed to stay healthy. It also requires better management of freight so the impact of moving goods, carrying out servicing and supporting construction delivering services on London’s streets is lessened. To deliver apply the Healthy Streets Approach, changes are required at strategic, network and street level.</p>		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.9	T2 Paragraph 10.2.4	<p>10.2.4 Londoners’ direct interaction with the Healthy Streets Approach will be through the streets they use every day. The Healthy Streets Approach aims to bring about positive changes to the character and use of the city’s streets. High-quality, pleasant and attractive environments with clean air and enough space for dwelling, walking, cycling and public transport use must be provided. The dominance of vehicles should be reduced by using design to ensure slower vehicle speeds and safer driver behaviour. Measures which that improve Londoners’ experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development.</p>	Campaign for Better Transport, London Forum of Amenity and Civic Societies	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.10	T2 Paragraph 10.2.5	<p>10.2.5... As part of this, the Mayor will work with the freight industry, its customers and London’s boroughs to develop more creative solutions to managing freight and deliveries...</p>		Consistency – within the plan	Minor change to wording, which has no consequences for the assessment.
ESC.10.11	T3 B	<p>B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London’s needs, including by:</p> <ul style="list-style-type: none"> 1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)... 3) safeguarding London’s walking and cycling networks the Walk London Network protecting access to and 	LB Hammersmith and Fullham, Sustrans	Clarification	Minor change to wording, which has no consequences for the assessment.

		improving the Thames Path and, where relevant, improving its alignment with the Thames.			
ESC.10.1 2	T3 D	D In Development Plans and development decisions, particular priority should be given to securing and supporting the delivery of upgrades to Underground lines, securing Crossrail 2, the Bakerloo L ine e Extension, river crossings and an eastwards extension of the Elizabeth L ine.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.1 3	T3 Table 10.1 (title row)	Scheme Cost ¹ Timescale 1 low: <£100m, medium: £100m-£1bn, high: >£1bn			Minor change to wording, which has no consequences for the assessment.
ESC.10.1 4	T3 Table 10.1	A new Walk and cycle river crossing for pedestrians and cyclists between Rotherhithe and Canary Wharf		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.1 5	T3 Table 10.1	Bakerloo L ine e Extension.		Readability	Minor change, which has no consequences for the assessment.
ESC.10.1 6	T3 Table 10.1	<i>Insert new row</i> Beam Park station low 2020-2030	LB Havering	Clarification	Minor addition, which has no consequences for the assessment.

ESC.10.1 7	T3 Table 10.1	Coach hub(s) reprovision medium 2020-2023 30		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.1 8	T3 Table 10.1	<i>Insert new row</i> Crossrail 2 eastern branch (subject to further assessment) high 2020-2041	LB Newham	Consistency with other GLA Strategies	Minor addition, which has no consequences for the assessment.
ESC.10.1 9	T3 Table 10.1	Heathrow Airport Southern Access (required for if airport expansion proceeds) medium high 2020-2041	LB Hammersmith and Fulham, Network Rail	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.2 0	T3 Table 10.1	Heathrow Airport Western Access (required for if airport expansion proceeds) medium high 2020-2041	LB Hammersmith and Fulham, Network Rail	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.2 1	T3 Table 10.1	<i>Insert new row</i> London Overground extension - West London Orbital	LB Barnet and LB Brent	Consistency with other GLA Strategies	Minor addition, which has no consequences for the assessment.
ESC.10.2 2	T3 Table 10.1	Northern L ine e Extension.		Readability	Minor change to wording, which has no consequences for the assessment.

ESC.10.2 3	T3 Paragraph 10.3.3	10.3.3 The Elizabeth L ine, due to open in 2019, will increase capacity within central London by about ten per cent, relieving crowding on the Tube network, and reducing journey times from east and west London to central London and the Isle of Dogs, and reducing congestion at stations Paddington, Liverpool Street and in the West End. This will mean that an extra 1.5 million people will be within 45 minutes' commuting distance of central London. The Elizabeth Line has been designed to allow for future increases in capacity, given the expected demand associated with an increasing population and growing employment in the areas it serves. An eastward extension to the Elizabeth line could support thousands of new homes and jobs along the route in Bexley and north Kent. The extension could link to High Speed 1 at Ebbsfleet and boost rail connectivity throughout the Wider South East.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.2 4	T3 Paragraph 10.3.5	10.3.5 Extending the Bakerloo L ine is also necessary to provide extra capacity on the Tube in south east London, enabling capacity for up to for 65,000 passenger journeys during the morning and evening peak. Increasing connectivity and reducing journey times will enable the Bakerloo L ine E extension to support more than 25,000 new homes and 5,000 jobs.		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.10.2 5	T3 Paragraph 10.3.5A	<i>Insert new paragraph 10.3.5A</i> 10.3.5A A key means of improving the efficiency of the transport network and unlocking growth potential is to eliminate physical barriers to movement, including in places where the Thames divides the communities on either side of it. Increasing the number and capacity of public transport links, as well as walking and cycling crossings, across the Thames will help to improve access to employment opportunities, support the development of thousands of new homes and enable healthier lifestyles.		Clarification	Reassessment required to ensure the assessment evaluates the health benefits and the removal of barriers within both the HIA and the EqIA.
ESC.10.2 6	T4 B	B... Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel P plans, P arking D esign and M anagement P plans, C onstruction L ogistics P plans and d elivery and s ervicing P Plans will be required in accordance with relevant Transport for London guidance ¹⁴² .	N/A	Readability	Minor change to wording, which has no consequences for the assessment.
ESC.10.2 7	T4 D	D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure.			
ESC.10.28	T4 Paragraph 10.4.1	10.4.1 It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process. Transport assessments are therefore necessary to ensure that planning applications can be reviewed and assessed for their specific impacts and for their compatibility with the Healthy Streets Approach. Consideration of the potential impacts on internationally important wildlife sites should also be assessed, where required.	Habitats Regulation Assessment / GLA	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.29	T4 Paragraph 10.4.4	10.4.4 Ideally, a New development that will give rise to significant numbers of new trips should be located in places well-connected by public transport, with capacity adequate to support the additional demand, or where there is a realistic prospect of additional access or capacity being provided in time to meet the new demand...	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.30	T5 A	A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:... 2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.	LB Camden, The Access Association, Inclusive Design and Access Panel, RB of Kensington and Chelsea, Wheels for Wellbeing, LB Havering, PFL Spaces, Arup	Clarification	Reassessment required to ensure the equalities assessment includes the consideration of adapted cycles, particularly within the EqIA.

ESC.10.3 1	T5 AA	AA Development Plans requiring more generous provisions of cycle parking based on local evidence will be supported	LB Hackney	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 2	T5 E	E Where the final land use class of a development is not determined at the point of application, the highest potential applicable cycle parking standard should be applied.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 3	T5 F	F All development proposals should provide Aa minimum of two short-stay and two long-stay cycle parking spaces must be provided for all land uses in all locations except with the exception of Class C3-C4 uses and Class A uses where the a size threshold is specified in Table 10.2 and has not been met	London Cycling campaign	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 4	T5 Table 10.2 C3-C4 long stay requirement	1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom unit dwelling 2 spaces per all other dwellings	LB Lewisham, LB Ealing, British Land, Berkeley Group	Multiple respondents felt the 1.5 spaces for all 1 beds was an excessive requirement	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 5	T5 Table 10.2 C3-C4 short stay requirement	5 to 40 dwellings: 2 spaces Thereafter: 1 space per 40 units dwellings	London Cycling Campaign	Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.10.3 6	T5 Table 10.2 Station requirements	To be considered on a case by case basis through liaison with TfL. The level of provision should take into account the type and location of the station, current and future rail and cycle demand and the potential for journey stages to and from the station to be made by cycle. A Future growth, though a step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 7	T5 Paragraph 10.5.3	10.5.3 The minimum standards for short-stay (for visitor / customer) cycle parking for Class A Uses and long stay cycle parking (for employees) for office use in the boroughs identified on Figure 10.2 are thus set at twice the level as elsewhere – though the Mayor will support other boroughs adopting these higher standards borough-wide or for defined areas through their Development Plan documents (such as existing Mini-Hollands, and Liveable Neighbourhoods or Opportunity Areas).	LB Enfield	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 8	T5 Paragraph 10.5.6	10.5.6... For nurseries and primary schools, an appropriate proportion of long-stay cycle parking spaces for students provision may be met through scooter parking...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.3 9	T5 Paragraph 10.5.9	10.5.9 The provision of space for folding bicycles is generally not an acceptable alternative to conventional cycle parking, as these cycles are only used by a minority of cycle owners, tend to be less affordable and can present difficulties for some users. An exception may be applied in office developments in the CAZ, where the location of rail termini lends itself to greater levels of folding bicycle use. This should only be applied for up to 10 per cent of long-stay spaces and where the full provision could not otherwise be provided. Provision of cycle hire caters for a different market of cyclist and also should not be accepted in lieu of cycle parking.	City of London Corporation, PFL Spaces, HB Reavis UK Limited, Get Living London, Argent (Property Development) Services LLP, London Property Alliance	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 0	T6 B	B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere	LB Hillingdon, LB Newham, LB Brent, London and Continental Railways, South West London	Clarification	Minor change to wording, which has no consequences for the assessment.

		designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with part D of this policy.	and St George's Mental Health NHS Trust, David Bonnett Associates, Inclusive Design and Access Panel, Get Living London, The Access Association		
ESC.10.4 1	T6 BA	T6 BB An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.	RB Greenwich, LB Brent London Travel Watch, Aitch Group and an individual, as well as concerns about overspill parking from LB Bromley, LB Bexley, LB Enfield, LB Redbridge, Westminster CC, LB Lewisham, LB Barnet, LB Richmond, various other organisations and individuals	Clarification	Minor addition, which has no consequences for the assessment.
ESC.10.4 2	T6 E new footnote 144A	E Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with policies T6.1, T6.2, T6.3 and T6.4. All operational parking should make this provision, including offering rapid charging as required^{144A}. New or redeveloped petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities. <i>Insert new footnote 144A</i> Where operational parking spaces are provided on-street, such as loading bays, any physical infrastructure required should not negatively affect pedestrian amenity	LB Ealing, LB Hackney, LB Sutton, Arcadis LLP, Brixton Society	Clarification	Minor addition, which has no consequences for the assessment.
ESC.10.4 3	T6 F	F Adequate provision should be made for efficient deliveries and servicing and emergency access.	London Fire and Emergency Planning Authority, London Ambulance Service	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 4	T6 G	G A Car Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on car parking management and car parking design.	Wheels for Wellbeing	Readability	Minor change to wording, which has no consequences for the assessment.

ESC.10.4 5	T6 H	H Boroughs wishing to adopt more restrictive general or operational parking policies will be supported, including borough-wide or other area-based car-free policies will be supported . Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential land uses classes in any part of London.	LB Hackney, LB Enfield, LB Hounslow, LB Ealing, LB Islington, City of London Corporation, LB Camden	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 6	T6 I	I Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.	Tesco Stores Ltd, Sainsbury's Supermarkets Ltd, Landsec, Clarion Housing Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 7	T6 Paragraph 10.6.1	10.6.1 To manage London's road network and ensure that people and businesses can move about the city as the population grows and housing delivery increases significantly , new parking provision must be carefully controlled. The dominance of vehicles on streets is a significant barrier to walking and cycling and reduces the appeal of streets as public places and has an impact on the reliability and journey times of bus services . Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the parking standards in this Plan is therefore an essential measure to support the delivery of new housing across the city. In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and existing residents can continue to park safely and efficiently.	RB Greenwich, LB Brent London Travel Watch, Aitch Group and an individual, as well as concerns about overspill parking from LB Bromley, LB Bexley, LB Enfield, LB Redbridge, Westminster CC, LB Lewisham, LB Barnet, LB Richmond, various other organisations and individuals Bus reliability point raised by LB Newham and Bexley Natural Environment Forum	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 8	T6 Paragraph 10.6.2	10.6.2 Maximum standards for car parking take account of PTAL as well as London Plan spatial designations and land use classes...		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.10.4 9	T6 Paragraph 10.6.4	10.6.2 Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and future levels	New Policy Institute	Clarification	Minor change to wording, which has no consequences for the assessment.

		wider measures of public transport, walking and cycling connectivity.			
ESC.10.5 0	T6 Paragraph 10.6.7	10.6.7 Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land use classes .		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.10.5 1	T6 Paragraph 10.6.8	10.6.8 Where electric vehicle charging points are provided on-street, physical infrastructure should ideally be located off the footpath. Where charging points are located on the footpath, it must remain accessible to all those using it including disabled people. In order to meet the Mayor's target for carbon-free travel by 2050, all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles.		Clarification	Reassessment required to ensure the consideration of pedestrian access, particularly disabled pedestrians, is considered in the IIA, particularly within the EqlA.
ESC.10.5 2	T6 Paragraph 10.6.8A	<i>Insert new paragraph 10.6.8A</i> 10.6.8A Surface-level car parking should be permeable where possible in accordance with Policy SI13 Sustainable drainage.	Thames Water	Clarification	Reassessment required to ensure the use of permeable surfaces is assessed in the IIA, particularly within the SEA.
ESC.10.5 3	T6.1 D	D Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.5 4	T6.1 G	G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum: 1) ensure that for three per cent of dwellings, ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset 2) demonstrate on plan and as part of the Car Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as with a designated disabled persons parking space in the future upon request. This should be provided as soon as existing provision is shown to be insufficient If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future.	RB Greenwich, LB Newham, LB Lambeth	Clarification	Minor change to wording, which has no consequences for the assessment.

<p>ESC.10.5 5</p>	<p>T6 Table 10.3</p>	<p>Maximum parking provision⁺ Car free⁻ Up to 0.25 spaces per dwelling unit Up to 0.5 spaces per dwelling unit Up to 0.75 spaces per dwelling unit Up to 1 space per dwelling unit Up to 1.5 spaces per dwelling unit^{+ ^}</p> <ul style="list-style-type: none"> • * Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed • • ~ With the exception of disabled persons parking, see Policy T6.1 G <p>^{+ ^} Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit</p>	<p>LB Hackney, LB Enfield, LB Hounslow, LB Ealing, LB Islington, City of London Corporation, LB Camden</p>	<p>Clarification</p>	<p>Minor change to wording, which has no consequences for the assessment.</p>
<p>ESC.10.5 6</p>	<p>T6 Paragraph 10.6.10</p>	<p>Car Parking Design and Management Plans should provide details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced. They should show where these spaces will be located and demonstrate how their availability will be made clear to residents prior to occupation to inform their housing decision. Where a bay is being marked up for a particular resident, this should be done prior to occupation. Details should also be provided of how existing or future residents would request a bay, how quickly it could be created and what, if any, provision of visitor parking for disabled residents is available. At In car-free developments, at no time should any space marked on plan for future disabled persons parking be used for general parking...</p>	<p>Wheels for Wellbeing, Get Living London</p>	<p>Clarification</p>	<p>Minor change to wording, which has no consequences for the assessment.</p>
<p>ESC.10.5 7</p>	<p>T6 Paragraph 10.6.12A</p>	<p><i>Insert new paragraph 10.6.12A</i> 10.6.12A Parking spaces should be leased rather than sold to ensure the land they take up is used as efficiently as possible over the life of a development. This includes enabling disabled persons parking bays to be used by those who need them at any given time and ensuring enlarged bays are available to be converted to disabled persons parking bays as required. Leasing allows for spaces with active charging points to serve electric or other Ultra-Low Emission vehicles, and can more easily support passive provision becoming active. Leasing also supports parking provision to be adaptable to future re-purposing, such as following changes transport technology or services. Leases should be short enough to allow for sufficient flexibility in parking allocation to reflect changing circumstances.</p>	<p>Get Living London, Galliard Homes</p>	<p>Clarification</p>	<p>Reassessment required to understand the impact leasing parking spaces has, particularly for disabled residents. This will be important for EqIA.</p>
<p>ESC.10.5 8</p>	<p>T6 Paragraph 10.6.12B</p>	<p><i>Insert new paragraph 10.6.12B</i> 10.6.12B Car clubs count towards the maximum parking permitted because they share many of the negative impacts of</p>	<p>LB Camden, LB Richmond, LB Redbridge, LB</p>	<p>Clarification</p>	<p>Reassessment required to ensure the IIA has considered the role of car clubs appropriately.</p>

		privately owned cars. However in some areas, car club spaces can help support lower parking provision and car-lite lifestyles by enabling multiple households to make infrequent trips by car.	Lambeth, Westminster CC, London Assembly Transport Committee, London Assembly Planning Committee, Bexley Labour Group, Zipcar, Federation of Small Businesses, Berkeley Group, London Forum of Amenity and Civic Societies, Hoare Lea LLP, Highams Park Planning Group, MSP Strategies Ltd		
ESC.10.59	T6.2 C	C Car parking standards for provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards, and take account of the significantly lower employment density in such developments. and consider a A degree of flexibility may also be applied to reflect different trip-generating characteristics. In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.	LB Ealing, LB Hackney, LB Sutton, Arcadis LLP, Brixton Society	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.60	T6.2 G	G A Car Parking Design and Management Plan should be submitted alongside all applications which include car parking provision.	Wheels for Wellbeing	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.61	T6 Table 10.4	Maximum parking provision* Car free^ <ul style="list-style-type: none">• * Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed• ^ With the exception of disabled persons parking, see Policy T6.5	LB Hackney, LB Enfield, LB Hounslow, LB Ealing, LB Islington, City of London Corporation, LB Camden	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.62	T6.3 A	A The maximum parking standards set out in Table 10.5 should be applied to new retail development. New retail development should avoid being car-dependent and should follow a town centres first approach, as set out in	Lidl UK GmbH, Canary Wharf Group, Kew Society, Tesco Stores Ltd	Clarification	Minor change to wording, which has no consequences for the assessment.

		<u>Policy SD8 Town centres: development principles and Development Plan Documents.</u>			
ESC.10.6 3	T6.3 EA	<i>Insert new clause T6.3 EA</i> EA Where car parking is provided at retail development, provision for rapid electric vehicle charging should be made	LB Ealing, LB Hackney, LB Sutton, Arcadis LLP, Brixton Society	Clarification	Reassessment required to ensure the provision of vehicle charging points at retail sites are assessed within the IIA.
ESC.10.6 4	T6 Table 10.5	Maximum parking provision* Car free^ <ul style="list-style-type: none">•• * Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed• ^ With the exception of disabled persons parking, see Policy T6.5	LB Hackney, LB Enfield, LB Hounslow, LB Ealing, LB Islington, City of London Corporation, LB Camden	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.6 5	T6 Paragraph 10.6.15A	10.6.15A Where significant provision of car parking at retail development can be justified, provision of rapid electric vehicle charging facilities should be made. Supplementary Planning Guidance on what provision is required will be provided.	LB Ealing, LB Hackney, LB Sutton, Arcadis LLP, Brixton Society	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.6 6	T6 Paragraph 10.6.17	10.6.17 Hotels and leisure uses should be located in accessible locations to encourage walking, and cycling and public transport use. Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.	LB Hackney, LB Enfield, LB Hounslow, LB Ealing, LB Islington, City of London Corporation, LB Camden	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.6 7	T6 Table 10.6	Retail, recreation, hotels and leisure - 6 per cent - 4 per cent Transport car parks - 5 per cent - 5 per cent Medical and health facilities - 6 per cent - 4 per cent Religious buildings and crematoria - Minimum two spaces or 6 per cent, whichever is the greater - 4 per cent Sports facilities - Refer to Sports England Guidance	Sport England	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.6 8	T6 Paragraph 10.6.18	10.6.18... The provision of disabled persons parking bays should be regularly monitored and reviewed to ensure the level is adequate and enforcement is effective. All proposals should include an appropriate amount of Some Blue Badge parking, should be providing at least one space provided even if no general parking is provided.	Arup, Inclusive Design and Access Panel	Clarification	Minor addition, which has no consequences for the assessment.
ESC.10.6 9	T7 – Policy title	Freight and Deliveries, servicing and construction		Clarification	Minor change to wording, which has no consequences for the assessment.

ESC.10.7 0	T7 A	Development Plans , Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to: <ol style="list-style-type: none"> 1) reduce freight trips to, from and within these areas 2) coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level 3) seek to reduce noise and emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles... 		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.7 1	T7 C	C Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with <u>Policy SI9 Safeguarded waste sites</u>, <u>Policy SI10 Aggregates</u> and <u>Policy SI5 Water infrastructure</u>. Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include: <ul style="list-style-type: none"> ○ Planning history, environmental impact and its relationship to surrounding land use context – recognising that the agent of change principle will apply ○ Location, proximity to the strategic road network and existing/potential markets ○ Existing and potential contribution the railhead can make towards catering for freight movements by non-road modes ○ The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands. 	Port of London Authority, Freight on Rail, Network Rail	Clarification	Additional wording, which has no consequences for the assessment.
ESC.10.7 2	T7 E	E Development proposals for new consolidation and distribution facilities should be supported provided that they:... <ol style="list-style-type: none"> 3) reduce noise and emissions from freight and servicing trips... 		Clarification	Reassessment required to ensure the assessment considers noise, particularly within the HIA and SEA.
ESC.10.7 3	T7 F	F Development proposals should facilitate sustainable freight deliveries and servicing, including through the provision of adequate space for servicing, storage and deliveries off-street...		Clarification	Minor addition, which has no consequences for the assessment.

ESC.10.7 4	T7 I	I Development proposals must consider the use of rail/water for the transportation of material and adopt appropriate construction site design standards to that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.	Freight on Rail, Brett group, Port of London Authority.	Clarification	Reassessment required to ensure the use of rail and water transport is assessed.
ESC.10.7 5	T7 IA	<i>Insert new clause T7 IA</i> IA The construction phase of development should prioritise and maintain inclusive, safe access for people walking or cycling at all times	Westminster City Council	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.7 6	T7 Paragraph 10.7.2	10.7.2 Currently many deliveries of non-urgent goods are made, unnecessarily, at congested times of the day. Lorries and vans less than half full and as As many as two in every three delivery slots are missed, leading to repeat trips that cause additional congestion and emissions. Many van and lorry trips could be avoided or re-timed if freight and servicing activity were better consolidated. Regional consolidation and distribution centres at the edge of London are needed to serve the city and town centres, coupled with micro-distribution centres in central and inner London. The identification and protection of new sites for load consolidation at a range of scales in central, inner and outer London to aid sustainable last mile consolidation is supported.	John Lewis Partnership	Clarification	Reassessment required to ensure the benefits of the Direct Vision Standard are assessed, particularly within the SEA.
ESC.10.7 7	T7 Paragraph 10.7.3	10.7.3 The Mayor will work with all relevant partners to improve the safety and efficiency of freight and servicing across London and support consolidation within and beyond London, as well as the retiming of movements to avoid peak hours. Improved on-site storage can reduce the need for deliveries during peak hours. Where kerbside loading is required it should be designed to minimise the impact on other road users and pedestrians and seek to minimise the transfer distance from vehicle to destination.		Clarification	Reassessment required to ensure the EqIA assesses the importance of considering inclusive design during the construction phases.
ESC.10.7 8	T7 Paragraph 10.7.6	10.7.6... The plans should be monitored and managed throughout the construction and operational phases of the development. TfL's f Freight tools including CLOCS (Construction Logistics and Community Safety), FORS Fleet Operator Recognition Scheme) or equivalent should be utilised to plan for and monitor site conditions to enable the use of vehicles with improved levels of direct vision. This should be demonstrated through a Site Assessment within a Construction Logistics	Boroughs, Sustrans	Clarification	Minor change to wording, which has no consequences for the assessment.

		Plan. Development proposals should demonstrate 'good' on-site ground conditions ratings or the mechanisms to reach this level. enabling the use of vehicles with improved levels of driver direct vision. To support the procurement of these vehicles and to minimise road danger, the Mayor has introduced his Direct Vision Standard, which rates HGVs on a star rating from 0 (lowest) to 5 (highest), based on how much the driver can see directly through their cab windows			
ESC.10.7 9	T8 B	B The Mayor supports the role of the airports serving London's airports in enhancing the city London's spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.			Reassessment required to ensure the HIA incorporates the health considerations within this policy.
ESC.10.8 0	T8 C	C The environmental and health impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change; any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.	London NHS Clinical Commissioning Group	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.8 1	T8 I	I Development of general and business aviation activity should generally be supported providing this would not lead to additional environmental harm or negative effects on health , or impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example introduction of scheduled flights at airports not generally offering such flights – should normally be refused.		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.8 2	T8 Paragraph 10.8.4	10.8.4 The Mayor recognises the need for additional runway capacity in the south east of England, but this should not be at the expense of London's environment or the health of its residents. Hundreds of thousands of Londoners are already exposed to illegal levels of air pollution and significant noise pollution as a result of Heathrow airport's current operations and activities. Heathrow airport's current operations are already a cause of concern for hundreds of thousands of Londoners, with its significant noise impacts and illegal levels of air pollution.	Heathrow Airport	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.8 3	T8 Paragraph 10.8.5	10.8.5 Any A airport expansion proposals should only be taken forward on the basis that noise impacts are avoided, minimised and mitigated, and proposals should not seek		Clarification	Minor change to wording, which has no consequences for the assessment.

		to claim or utilise noise improvements resulting from technology improvements unrelated to expansion...			
ESC.10.8 4	T8 Paragraph 10.8.6	10.8.6 Any Airport expansion proposals should not worsen existing air quality or contribute to exceedance of air quality limits, nor should it they seek to claim or utilise air quality improvements resulting from unrelated Mayoral, local or national policies and actions...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.8 5	T8 Paragraph 10.8.7	10.8.7 The Mayor will therefore strongly oppose any expansion of Heathrow Airport that would result in additional environmental harm or negative public health impacts . Air quality gains secured by the Mayor or noise reductions resulting from new technology must be used to improve public health, not to support expansion. The Mayor also believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts. Stansted Airport could, in due course, make better use of its single runway if its flight cap were raised, subject to appropriate environmental mitigation and controls. London City Airport is working to upgrade its passenger facilities and enhance operational efficiency in conjunction with the introduction of additional environmental mitigation measures and what amounts to the introduction of additional environmental mitigation measures and what amounts to a reduction of its maximum permitted number of movements and the introduction of additional environmental mitigation measures...	London City Airport	Clarification	Reassessment required to ensure the HIA incorporates the health considerations within this policy.
ESC.10.8 6	T8 Paragraph 10.8.8	10.8.8... It will not be sufficient to rely on schemes designed to cater for background growth such as the Elizabeth L ine, Thameslink and Crossrail 2...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.10.8 7	T9 Paragraph 10.9.1	10.9.1... The Mayor's first MCIL (MCIL1) was introduced in 2012 to contribute to Crossrail 1 (the Elizabeth L ine) funding, and was designed as a single rate community infrastructure levy for each London borough, covering all development other than education and health...		Clarification	Minor change to wording, which has no consequences for the assessment.
Chapter 11 Funding the London Plan					
ESC.11.1	DF1 A	A Applicants should take account of Development Plan policies when developing proposals and acquiring land. Development proposals should provide the infrastructure and meet the	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.

		other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. ...			
ESC.11.2	DF1 D	D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) R recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) R recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.			Minor change to wording, which has no consequences for the assessment.
ESC.11.3	DF1 C	C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms. ...	Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.11.4	DF1 E	E Boroughs are also encouraged to take account of the infrastructure prioritisation in part D in developing their Community Infrastructure Levy Charging Schedule and determining the infrastructure that will be funded through borough CIL-Regulation 123 list.	Boroughs	Clarification	Reassessment required to ensure funding is considered in the IIA.
ESC.11.5	DF1 Paragraph 11.1.4 New footnote 146A	11.1.4... These may include circumstances where an applicant is required to provide significant infrastructure improvements to facilitate delivery of a development (beyond the level that would typically be required for the scale of development) ^{146A} , or where the value generated by a development would be exceptionally low. <i>Insert new footnote 146A</i> The need for infrastructure provision to facilitate a site being brought forward for development or the presence of abnormal development costs will impact land value and the cost should not necessarily be born through a reduction in planning obligations.	Boroughs	Consistency with other GLA strategies	Minor change to wording, which has no consequences for the assessment.
ESC.11.6	DF1 Paragraph 11.1.5	11.1.5... The application should be determined in accordance with the Development Plan, with the decision-maker determining the weight to be given to viability alongside other relevant material considerations. This should ensure that proposals remain acceptable in planning terms.	London Boroughs	Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.11.7	DF1 Paragraph 11.1.8 New footnote 146B	11.1.8 London's growth is important for the whole of the United Kingdom. Almost a quarter of the country's output, and around 30 per cent of its economy-related tax take is generated in the Capital^{146B}. For London to continue to grow as set out in this London Plan, Londoners will need access to genuinely affordable homes and good jobs, supported by necessary social infrastructure, transport,		Clarification and readability	Reassessment required to ensure funding is considered in the IIA.

		<p>utilities, and green infrastructure. However, the Mayor currently possesses limited powers to fund affordable housing and infrastructure. There is a significant gap between the public-sector funding required to deliver and support London's growth, and the amount currently committed to London. In many areas of the city, major development projects are not being progressed because of the uncertainty around funding. In the short-term, it is therefore necessary for London and Londoners to have greater certainty over the public funding that central government plans to commit to the city's growth.</p> <p><i>Insert new footnote 146B</i></p> <p>London Finance Commission, 2017</p>			
ESC.11.8	DF1 Paragraph 11.1.19	11.1.19 In order to accelerate and / or de-risk housing development in the capital the Mayor is already making funding available, and he has secured £3.154.82 billion to support 11690,000 affordable housing starts by 2024 2 ...		Factual update	Minor change to wording, which has no consequences for the assessment.
ESC.11.9	DF1 Paragraph 11.1.22	11.1.22... As a minimum, this role should mirror that operated by the Homes England and Communities Agency , which directly manages the release of surplus Government landholdings outside London.		Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.11.10	DF1 Paragraph 11.1.28	<p>11.1.28 Transport in London is funded through a combination of sources, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> • Business Rate Retention under Mayoral control, which is replacing existing direct Government grants for operations and new capital investment from 2017-18 <input type="checkbox"/> • Rrevenue from fares and other 'user pays' sources (e.g. Congestion Charging) <input type="checkbox"/> • Non-fare sources (e.g. advertising and property) <input type="checkbox"/> • Contributions from the London boroughs and the private sector, for example, developer funding for associated transport investments <input type="checkbox"/> • Other specific grants <input type="checkbox"/> • TfL 'prudential borrowing' against future revenue 		Readability	Minor change to wording, which has no consequences for the assessment.
ESC.11.11	DF1 Paragraph 11.1.29	11.1.29 In addition, for the Elizabeth Line project, there are specific ring-fenced funds (e.g. specific levies such as the Business Rate Supplement and Mayoral CIL). The intention is that from April 2019 MCIL2 will supersede the current Mayor's Community Infrastructure Levy (MCIL1) and the associated planning obligation/S.106 charge scheme applicable in central London and the northern part of the Isle of Dogs. Subject to consultation and examination in public, MCIL2 will be ringfenced to contribute £4.5 billion of funding for Crossrail 2.		Factual update	Minor change to wording, which has no consequences for the assessment.

ESC.11.1 2	DF1 Paragraph 11.1.30	11.1.30...The Elizabeth Line, Northern Line extension, Overground extension to Barking Riverside and Silvertown Tunnel have identified funding packages and will be delivered in the early years of the Plan. ...		Factual correction	Minor change to wording, which has no consequences for the assessment.
ESC.11.1 3	DF1 Paragraph 11.1.44	11.1.44...In general, decisions on where to invest in infrastructure are determined on a demand-led or network capability and capacity basis. ...		Clarification	Minor change to wording, which has no consequences for the assessment.
ESC.11.1 4	DF1 Paragraph 11.1.55	11.1.55...This is of concern because cultural infrastructure is important to local communities, to the tourism industry and to sustaining the creative economy, which is a source of significant employment growth and worth £4 27 billion to London's economy.		Factual Update	Minor change to wording, which has no consequences for the assessment.
ESC.11.1 5	DF1 Paragraph 11.1.64 New footnote 155A	11.1.64 In recognition of this, and following an invitation for TfL to bring forward proposals for funding infrastructure projects from land value uplift, the Government has agreed to establish a joint task force (including the GLA and TfL) to explore the options for piloting a Development Rights Auction Model on a major infrastructure project in London. Major transport investment can significantly increase the value of land, particularly if it is close to a train station or transport hub. Land value capture is a term used to describe the use of this increase in land value to fund investment in public services, such as transport. In 2017 the Government announced a taskforce^{155A} to investigate a new way of paying for infrastructure projects, such as new public transport, including via land value capture. The Government asked the taskforce to look at the so called 'Development Rights Auction Model' of land value capture. TfL prepared a report, which studied the model in detail, and found that it would be unlikely to raise significant funding in London. <i>Insert new footnote 155A</i> The taskforce is led by the Ministry of Housing, Communities and Local Government and the Mayor of London's Office, and includes HM Treasury, the Department for Transport, TfL and London Councils.		Factual update	Additional wording, which has no consequences for the overall assessment.
ESC.11.1 6	DF1 Paragraph 11.1.65	11.1.65 There are a range of other infrastructure investments and interventions that can increase the value of land, and other options for capturing land value uplift. and The Mayor will continue to work with government to explore all avenues for ensuring Londoners receive the vital infrastructure required to support growth.		Clarification	Minor change to wording, which has no consequences for the assessment.