

Greater London Authority

Publication London Plan

Integrated Impact Assessment Addendum
Report

December 2020

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Introduction

On 13 March 2020, the Secretary of State (SoS) issued 11 directions to the Mayor directing the Mayor to amend the Intend to Publish London Plan (ItP). In his letter to the Mayor, the SoS stated that he would consider alternative changes to policy that addressed his concerns. The Mayor proposed alternative wording in relation to 6 of the 11 directions.

This IIA addendum report includes assessments of the SoS directions and subsequent modifications to the Intend to Publish as set out in the Publication London Plan. The SoS directions can be found at Annex 1 and the schedule of the modifications to the ItP London Plan assessed by this IIA and included in the Publication London Plan can be found in Annex 2.

Background

The draft London Plan and IIA were issued for consultation in December 2017. As a result of the consultation, the draft London Plan was amended to take account of the consultation and a Minor Suggested Change version of the Plan was published in August 2018. An IIA addendum report was also published alongside this, which assessed any changes to the draft London Plan policies as a result of the consultation.

The draft London Plan underwent an Examination in Public between January 2019 to May 2019. As a result of responding to participants' written statements and debate at the EiP, a set of Further Suggested Changes were proposed which were assessed against the IIA objectives. A consolidated version of the Plan, which incorporated all the minor and further suggested changes, was published in July 2019. This was considered by the Panel of Inspectors, who issued their Report on the Examination of the London Plan in October 2019.

The draft London Plan was then further amended to take account of the inspectors' recommendations that the Mayor was minded to accept and an 'Intend to Publish' version of the Plan was sent to the Secretary of Statement in December 2019. An IIA addendum report which included assessments undertaken for the Further Suggested Changes and the inspectors' recommendations was published alongside the ItP Plan in December 2019.

IIA Framework

The Integrated Impact Assessment consists of four component assessments:

- Equalities Impact Assessment (EqIA)
- Strategic Environmental Assessment (SEA)
- Health Impact Assessment (HIA)
- Community Safety Impact Assessment (CSIA)

The purpose of the IIA is to assess the likely effects of the Plan's policies on a number of environmental, social and economic objectives – in order to further promote the positive impacts and to, ideally, mitigate any potential negative impacts of policies.

There are 24 objectives, each with a number of guide questions that correspond to one of the assessments above. For further details of the guide questions, see Annex 3.

Table 1 sets out a scoring related to the significance of the potential effects of the policies.

Table 1: Significance of Effect

Significance of effect	
++	Significant positive
+	Minor positive
0	Neutral
-	Minor negative
--	Significant negative
?	Unknown
N/A	Not applicable

Unknown - This is where there is insufficient information to make a robust assessment.

N/A - This is where the objective is clearly not affected by the policy being assessed.

For each policy subject to a direction, there is a narrative setting out the impact of the changes on each of the relevant IIA objectives and a corresponding matrix where the changes have led to a revised scoring within the matrix.

Where policies have not been subject to directions, or where the narrative has not led to a revised scoring in the matrix, the original matrixes either in the original IIA Report in November 2017, the Minor Suggested Changes Addendum Report in July 2018 or the Intend to Publish IIA Addendum Report November 2019 still stand.

To note Direction DR 8 is related to changes to the introduction and therefore is not subject to the IIA.

Terms used in the IIA scoring tables

ItP – Intend to Publish London Plan December 2019

SoS – The Secretary of State for Housing, Communities and Local Government Direction March 2020

PLP – Publication London Plan December 2020

Summary of Findings

There were no changes to the IIA scoring as a result of the SoS directions or the relevant policy and/or supporting text in the Publication London Plan for directions DR1, DR3, DR5, DR11 or DR12. However, it was noted that if DR3 results in less affordable housing than would have been delivered otherwise, this is more likely to have an indirect impact on those with protected characteristics of race, sex and sexual orientation.

Direction DR2 resulted in lower scoring for design, connectivity, heritage primarily, health and health inequalities and social integration objectives due to the introduction of ambiguity into the policy. However, the Publication London Plan addresses this ambiguity and therefore scores as highly as the Intend to Publish version.

Direction DR4 (including the amendments included in the SoS's response on 10 December 2020) resulted in lower scores for equality and inclusion, sustainable land use, connectivity and economic competitiveness and employment objectives. Although the modifications in the Publication London Plan differ from the SoS direction in order to ensure the changes would not have unintended consequences, these changes do not improve the overall scoring of the relevant policies against these objectives.

Direction DR6 results in a slightly lower scoring against the natural capital and natural environment objective but it remains positive overall.

Although the Gypsy and Traveller policy is still positive overall compared to not having a policy, the direction DR7 has reduced positive impacts compared to the Intend to Publish version in terms of health and health inequalities, housing supply, quality, choice and affordability, equality and inclusion and social integration objectives. This is particularly likely to impact upon the characteristic of race, given that many Gypsies and Travellers are protected through the Equality Act 2010 on the grounds of their ethnic identity. However, the Gypsy and Traveller community will also comprise those with all other protected characteristics and who may experience disproportionate impacts. Modifications that would have potentially improved scoring against these objectives was rejected by the SoS as inconsistent with national policy.

Direction DR9 scored lower overall for sustainable land use, connectivity, air quality, health and health inequalities and equality and inclusion compared to the Intend to Publish London Plan. The modifications in the Publication London Plan improve scoring for all of these objectives but still slightly lower than the ItP version.

Direction DR10 and the Publication London Plan had slightly more uncertain scoring for health and health inequalities, air quality, connectivity, design and sustainable land use because it will depend how the policy is taken forward in local plans although it was still positive.

Direction DR1	Relevant Policy: H10 Housing Size Mix
<p>1. Assessment:</p> <p>Brief summary of the extent of changes:</p> <p>When determining the appropriate unit size mix in residential schemes, the need to consider the role of additional family housing in freeing up existing family homes has been added to the policy by the Direction.</p> <p>The overarching aim of policy H10 is to ensure the delivery of a range of unit sizes within schemes, having regard to a number of policy requirements. This ensures choice in the housing market and positively contributes to numerous IIA objectives. The requirement to take into account the need for additional family housing is implicit to the policy aims and the change has no material impact upon IIA objectives.</p>	
<p>2. SEA (Strategic Environmental Assessment)</p> <p>2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>3. HIA (Health Impact Assessment)</p> <p>3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>4. CSIA (Community Safety Impact Assessment)</p> <p>4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	No
Sex	No
Race	No
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

No impacts identified.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

1. Assessment:**Brief summary of the extent of changes:**

The directed changes to Policy D3 overall will not change the intended approach/aim of the policy to optimise site capacity through the design-led approach. The Direction includes the moving of some supporting text into the main body of the policy. The directed changes also introduce new text that encourages the expansion of existing clusters of high-density buildings, and gentle densification (term introduced in the Building Better Building Beautiful Report) in low- and mid-density locations. Due the ambiguity of the terms used and lack of clarity in their application these changes are likely to lead to confusion in the implementation of the policy.

Proposed amendments to the direction

Specific terminology considered to be ambiguous or confusing has been replaced with different words/terms considered to be clearer and more commonly understood.

Part A has been clarified to make it clear that type of land use is an essential element of achieving the optimal site capacity alongside type of built form.

Part B has also been amended to group all references to high and higher density in one section of the policy in order to ensure that these references are linked back to the defined areas where this type of development should be promoted. A cross reference to Policy D2 has been added to help to ensure that the necessary supporting infrastructure exists or is planned to support higher density development.

The more detailed proposed amendments to the direction are as follows:

Additional words/phrases have been inserted at points throughout the policy where it is considered that this would help to explain the policy requirements or provide for appropriate exceptions. Specific terminology considered to be unnecessarily ambiguous or confusing has been replaced with different words/terms considered to be clearer and more commonly understood.

Part A and D have been merged to reduce repetition within the policy and clarify that optimising site capacity and making the best use of land requires having the right land use, as well as the right built form for the site.

Additional text has been included in paragraph 3.3.1 to help clarify that optimising site capacity requires having the right land use, as well as the right built form for the site to meet identified need e.g. housing need.

Reason: These changes suggested to direction are required to improve the clarity and remove ambiguity and potential confusion around policy interpretation and implementation. They would also reduce repetition within the policy.

2. SEA (Strategic Environmental Assessment)

2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

Directed changes

- Encouraging the expansion of existing clusters of high-density buildings may have a negative impact on the objective to make the best use of land through appropriate development. The existence of high-density buildings in an area does not necessarily imply that it is a sustainable use of land to develop more high-density buildings around this area, as there may not be the necessary infrastructure or access to services and amenities to support the development.
- The introduction of a term such as 'gentle densification' may negatively impact on the objective to make the best use of land as it is ambiguous and it is not a planning term covered by the NPPF or Planning Practice Guidance. Therefore, it is not clear how development is to achieve this requirement.
- There is ambiguity around the meaning of the terms low-density and mid-density, thus their use may have a negative impact on sustainable land use as it is not clear how locations of this nature should be identified or defined. This lack of policy clarity may lead to differing expectations from different stakeholders (e.g. the community, developers) about the likely future character of an area.

Overall this is likely to result in a general permanent downgrading of the scoring in the short, medium and long term for Policy D3.

Proposed amendments to the direction

- Removing the reference to the poorly defined and ambiguous terms 'low and mid-density locations' and adding the text 'in other areas' to part C will clarify that this section of the policy applies to areas not covered in previous parts of the policy. Reducing ambiguity and confusion around which areas are potentially appropriate locations for higher density development may have a positive impact on the objective to make the best use of land through appropriate development.
- Clarifying in part A that optimising site capacity requires having the right land use as well as the right built form for the site may have a positive impact on the objective to make the best use of land through appropriate development. This is because it would help to reduce ambiguity around how the design of the development is to optimise site capacity.
- Grouping all of the references to high and higher density in one section (B) rather than having some in part A and some in B will help mitigate the negative impacts of the directed change by ensuring that references to these high-density areas are linked back to the defined areas where higher density development should be promoted.
- Adding a reference to Policy D2 to ensure that the necessary supporting infrastructure exists or is planned to support higher density development may have a positive impact on the requirement to integrate land use and transport.
- Using the word 'areas' rather than 'clusters' in part B will help mitigate the negative impact of the directed change on the objective to make the best use of land through appropriate development as it will reduce ambiguity and potential confusion around the meaning of the term and how to achieve the requirement in the policy.
- Replacing the word "gentle" with "incremental" in part C will help to reduce confusion around the meaning of the terms as it is a more commonly understood term in planning. This will help

mitigate the negative impact of the directed change on the objective to make the best use of land by reducing ambiguity around the policy text.

- Merging Policy D3(A) and (D) may help mitigate the negative impact of the directed change on the objective to make the best use of land through appropriate development as it will reduce repetition within the policy. This change together with the additional text proposed for paragraph 3.3.1 will also help to clarify that optimising site capacity and making the best use of land requires having the right land use, as well as the right built form for the site to meet identified need e.g. housing need.
- Replacing “areas” with “locations” in part B may help mitigate the negative impact of the directed change on the objective to make the best use of land through appropriate development. This change may reduce confusion around interpretation as “areas” is used in a different context later in this part of the policy i.e. to refer to areas with high density buildings.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

Objective 7 Design

Directed changes

- Encouraging the expansion of high-density building clusters may have a negative impact on cityscape and protected views by making it more difficult for boroughs to justify refusing an inappropriate high-density development in locations adjacent/near to existing clusters.

These changes are likely to result in a general downgrading of the scoring in the medium and long term for Policy D3.

Proposed amendments to the direction

- Merging Policy D3(A) and (D) may have help to mitigate the negative impact of the directed change on the objectives to promote high quality design and conserve and enhance the townscape/cityscape character by clarifying the relationship between the optimisation of site capacity and the design-led approach to development where making the best use of land requires having the right land use, as well as the right built form for the site.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

Objective 9 Connectivity

Directed changes

- Encouraging the expansion of existing clusters of high-density buildings may have a negative impact on the objective as the existing cluster as there may not be the necessary public transport infrastructure to support the development and thus traffic volumes may increase.
- Encouraging the promotion of higher density developments in areas that are well connected to jobs, services, infrastructure and amenities may have a positive impact by reinforcing the Plan’s design-led approach to development. However, this is a requirement already covered by Policy D2 and thus the repetition of this point in Policy D3 will not result in an impact to this objective.

These changes are likely to result in a downgrading of the scoring in the short, medium and long term for Policy D3.

Proposed amendments to the direction

- Removing the reference to the poorly defined and ambiguous terms ‘low and mid-density locations’ and adding the text ‘in other areas’ to part C will clarify that this section of the policy applies to areas not covered in previous parts of the policy. Reducing ambiguity and confusion

around which areas are potentially suitable locations for higher density development may have a positive impact on the objective to enhance and improve connectivity for all to, from, within and around London.

- Grouping all of the references to high and higher density in one section (B) rather than having some in part A and some in B will help mitigate the negative impacts of the directed change by ensuring that references to these high-density areas are linked back to the defined areas where higher density development has good access to public transport.
- Adding a reference to Policy D2 in part B (of policy D3) will help to ensure that the necessary supporting infrastructure exists or is planned for to support higher density development. This may have a positive impact on the objective to enhance and improve connectivity for all to, from, within and around London.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

Objective 21 Historic Environment

Directed changes

- Encouraging the expansion of high-density building clusters may have a negative impact on heritage assets, their setting and the wider historic environment by making it more difficult for boroughs to justify refusing an inappropriate development in locations adjacent/near to existing clusters.
- The encouragement of ‘gentle densification’ may also negatively impact on the objectives to improve the quality and condition of the historic environment, and respect, maintain and strengthen local character and distinctiveness because of the ambiguity of the term meaning it is not clear how development is to achieve this requirement. This lack of policy clarity may lead to differing expectations about how to ensure that these objectives relating to the historic environment and local character are achieved.

These changes are likely to result in an indirect permanent downgrading for the scoring in the long term for D3.

Proposed amendments to the direction

- Replacing ‘gentle densification’ with ‘incremental densification’ may help slightly to mitigate the negative impact of the directed change on the objective as it is a more commonly understood term in planning than gentle and thus the policy text will be less ambiguous.
- The addition of the word “generally” to part B of the policy may help to mitigate the negative impact of the directed change on the objective to conserve and enhance the existing historic environment as it provides for the fact that some well-connected areas may not be suitable for the promotion of higher density e.g. areas with a large number of heritage assets.
- The addition of the words “where appropriate” to part B of Policy D3 clarifies the policy requirement and may help to mitigate the negative impact of the directed change by helping to improve the quality and condition of the historic environment because it acknowledges that expanding an area of high density buildings may not be an appropriate outcome dependent on existing area constraints such as the location of/potential impacts on heritage assets.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

2b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
D3	Objective 6 Sustainable Land Use	Short	+	0	+
		Medium	+	0	+
		Long	++	0/+	++
	Objective 7 Design	Short	+	+	+
		Medium	++	+	++
		Long	++	+	++
	Objective 9 Connectivity	Short	+	0	+
		Medium	+	0	+
		Long	+	0	+
	Objective 21 Historic Environment	Short	0	0	0
		Medium	0	0	0
		Long	?/+	0	?/+

- **HIA (Health Impact Assessment)**

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health and Health Inequalities

Directed changes

- Encouraging the promotion of higher density developments in areas that are well connected e.g. to services and infrastructure may have a positive impact by improving access and equity of access to health and social care services and facilities for future residents and/or occupiers of these types of developments. However, this requirement is already covered in the Plan in policy D2 and so the inclusion of this change to Policy D3 includes unnecessary repetition in the Plan.
- Encouraging the expansion of existing clusters of high-density buildings may have a negative impact on the objective to improve access and equity of access to health and social care services and facilities as there may not be the necessary infrastructure or access to services and amenities to support the development. This may mean that access and equity of access would be reduced.

These changes are likely to result in a general downgrading of the scoring in the medium and long term for Policy D3.

Proposed amendments to the direction

- Clarifying the wording of part C and adding a reference to Policy D2 in part B (of policy D3) will help to ensure that the necessary supporting infrastructure exists or is planned for to support higher density development. This may have help to mitigate the negative impact of the directed change by helping ensure there is access and equity of access to health and social care services and facilities.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

3b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
D3	Objective 3 Health and Health Inequalities	Short	+	+	+
		Medium	+	0	+
		Long	+	0	+

- **CSIA (Community Safety Impact Assessment)**

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 9 Connectivity

Directed changes

- Encouraging the expansion of existing clusters of high-density buildings and potentially the expansion of Opportunity Area boundaries without requiring that the necessary infrastructure is already in place or planned to be delivered to cope with the increased pressure on capacity may have a negative impact by putting added pressure on existing transport infrastructure including the public realm. This may lead to less attractive and safe active travel routes.

This change is likely to result in a direct permanent downgrading for the scoring in the medium and long term for D3.

Proposed amendments to the direction

- Clarifying the wording of part C and adding a reference to policy D2 in part B (of policy D3) will help to ensure that the necessary supporting infrastructure exists or is planned for to support higher density development. This may help to mitigate the negative impact of the directed change by improving access and equity of access to health and social care services and facilities.

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

4b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
D3	Objective 9 Connectivity	Short	+	+	+
		Medium	+	0	+
		Long	++	0	++

- **EqlA - Equality Impact Assessment**

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	Yes
Age	Yes
Sex	Yes
Race	Yes
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	Yes
Pregnancy & maternity	Yes

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 - Equality and Inclusion and Objective 2 – Social Integration

Directed changes

- Encouraging the promotion of higher density developments in areas that are well connected e.g. to services and infrastructure may help to improve access and equity of access to services and facilities which could result in a reduction in social exclusion, and promote equality, fairness and respect for groups including homeless householders and rough sleepers, and looked-after children. It may also help to provide more opportunities for Londoners to actively participate in the city's life, decision making and communities which could represent a positive impact for groups who are at higher risk of social isolation including BAME Londoners and people aged 20-24.¹
- Conversely, encouraging the expansion of existing clusters of high-density buildings and potentially the expansion of Opportunity Area boundaries without requiring that the necessary infrastructure is already in place or planned to be delivered to cope with the increased pressure on capacity may reduce opportunities for Londoners to actively participate in the city's life and communities, and lead to increased social exclusion as it may reduce access and access and equity of access to health and social care services and facilities, and increase crowding on public transport services. This could represent an indirect negative impact on groups including rough sleepers and the Gypsy and Irish traveller community, already identified as having a higher risk factor for social exclusion.² Increased crowding on public transport services may make this a less attractive option for travel for those who share the protected characteristic of pregnancy and maternity as overcrowding would make public transport journeys less comfortable.³ If this group is discouraged from using public transport, they may lose opportunities to actively participate in the city's life as well as losing opportunities to connect with Londoners.

These changes are likely to result in a permanent general downgrading of the scoring in the short, medium and long term for Policy D3.

- Proposed amendments to the direction Clarifying the wording of part C and adding a reference to policy D2 in part B (of policy D3) will help to ensure that the necessary supporting

¹ GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

² Ibid.

³ GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

infrastructure exists or is planned for to support higher density development. This may help to mitigate the negative impact of the directed change by improving access and equity of access to infrastructure e.g. public transport services, and health and social care services and facilities. This could help to reduce poverty and social exclusion and isolation and provide more opportunities for Londoners to actively participate in the city's life which could represent a direct positive impact for groups already identified as being more at risk of these factors including BAME Londoners and people aged 20-24, homeless households, rough sleepers and the Gypsy and Irish traveller community.⁴

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

Objective 3 Health and Health Inequalities

Directed changes

- Encouraging the promotion of higher density developments in areas that are well connected e.g. to services and infrastructure may help to improve access and equity of access to health and social care services and facilities for future residents and/or occupiers of these types of developments. This may help to reduce inequalities in physical and mental health and wellbeing which would have a positive impact on different groups of people such as those aged 40-59, those who are not married or in a civil partnership, and disabled people, are more likely to have low levels of personal wellbeing. It may also help to provide more opportunities for Londoners to actively participate in the city's life, decision making and communities which could represent a positive impact for groups who are at higher risk of social isolation including BAME Londoners and people aged 20-24.⁵ However, this requirement is already covered in the Plan in policy D2 and of this point in Policy D3 will not result in an impact to this objective.
- Encouraging the expansion of existing clusters of high-density buildings may have a negative impact on the objective to improve access and equity of access to health and social care services and facilities as there may not be the necessary infrastructure or access to services and amenities to support the development. This may mean that access and equity of access would be reduced which may have an adverse impact on people that UK research suggests are already more likely to have low levels of personal wellbeing including those aged 40-59, renters and those who are not married or in a civil partnership, along with disabled people. It may also have a direct negative impact on those groups who are already identified as being at greater risk of poor mental health include young women, people aged 35-44, disabled adults, unemployed men and people who are obese⁶.

These changes are likely to result in a general permanent downgrading of the scoring in the short, medium and long term for Policy D3.

Proposed amendments to the direction

- Clarifying the wording of part C and adding a reference to Policy D2 in part B (of policy D3) will help to ensure that the necessary supporting infrastructure exists or is planned for to support higher density development. This may help to mitigate the negative impact of the directed change by improving access and equity of access to health and social care services and facilities. This may help to reduce inequalities in physical and mental health and wellbeing and represent a positive impact for those groups who may be more reliant on related services and already

⁴ Ibid.

⁵ GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

⁶ Ibid.

identified as being at greater risk of poor mental health such as young women, people aged 35-44, disabled adults, unemployed men and people who are obese.⁷

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

Objective 9 Connectivity

Directed changes

- Encouraging the expansion of existing clusters of high-density buildings and potentially the expansion of Opportunity Area boundaries without requiring that the necessary infrastructure is already in place or planned to be delivered to cope with the increased pressure on capacity may have a negative impact of increasing crowding on public transport services which may contribute to making this a less attractive option for travel. This may represent a negative impact in particular for those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys less comfortable if they are overcrowded.⁸

This change is likely to result in a direct permanent downgrading for the scoring in the short, medium and long term for D3.

Proposed amendments to the direction

- Clarifying the wording of part C and adding a cross policy reference (to policy D2) in part B of policy D3 will help to ensure that the necessary supporting infrastructure exists or is planned for to support higher density development. This is likely to have the positive impact of reducing or mitigating crowding on public transport services as London grows. Managing future levels of crowding by improving transport capacity and connectivity should also have a beneficial impact on those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys more comfortable.⁹

These changes are likely to revert the scoring back to that of the Intend to Publish version of Policy D3.

5c. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
D3	Objective 1 Equality and Inclusion	Short	+	?/+	+
		Medium	+	0	+
		Long	+	0	+
	Objective 2 Social Integration	Short	+	?/+	+
		Medium	+	0	+
		Long	+	0	+
	Objective 3 Health and Health Inequalities	Short	+	?/+	+
		Medium	+	0	+
		Long	+	0	+
	Objective 9 Connectivity	Short	+	?/+	+
		Medium	+	0	+
		Long	+	0	+

⁷ GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

⁸ Ibid.

⁹ GLA Intelligence. June 2019. Equality, diversity and inclusion evidence base for London.

Direction DR3	Relevant Policy: H2 Small sites
<p>1. Assessment:</p> <p>Brief summary of the extent of changes:</p> <p>Supporting text paragraphs that recognised the important role that schemes of 9 units or fewer can play in affordable housing delivery are deleted. This text encouraged boroughs to use evidence to prepare local policies seeking affordable housing contributions on non-major schemes, where possible, and provided guidance on how and when such contributions should be sought.</p> <p>Affordable housing policy (H5) is clear that affordable housing contributions are triggered by major schemes (those of 10 units or more). The Plan does not require contributions on non-major development schemes at the pan-London level. Whilst the deletion of these paragraphs does not alter the objectives or intended implementation of the Plan, there is no longer explicit support within the document for boroughs to pursue contributions from smaller schemes. There remains however an acute need for affordable housing across London that will be identified by local evidence. Given this, whilst the withdrawal of explicit support at the regional level could be negative, its deletion is likely to have a limited impact on whether boroughs chose to explore this policy option when seeking to meet their own local needs. Overall, the impact from the Direction will have an unknown impact upon IIA objectives.</p>	
<p>2. SEA (Strategic Environmental Assessment)</p> <p>2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>3. HIA (Health Impact Assessment)</p> <p>3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?</p> <p>No impacts identified.</p> <p>3b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>4. CSIA (Community Safety Impact Assessment)</p> <p>4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?</p> <p>No impact identified.</p>	

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	Yes
Sex	Yes
Race	Yes
Religion	No
Sexual orientation	Yes
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 – Equality and Inclusion:

- If the change to the policy results in less affordable housing delivery across the plan period than might otherwise have been achieved, this is more likely to have an indirect impact upon those with the protected characteristics of race, sex and sexual orientation.
- Any impact on the potential supply of affordable housing fails to make the most of the possibility of advancement of equality of opportunity given that women, BAME and LGBT groups are disproportionately impacted by issues of homelessness and overcrowding (discussed further below).
- That said, the change to the policy may be mitigated at the local level through Local Planning Authorities using local evidence to require affordable housing contributions on schemes of 9 units or fewer and so impacts remain uncertain and no change is proposed to the scoring.

Objective 5 – Housing supply, quality, choice and affordability:

- If affordable housing supply is reduced this could have a negative impact the objective to reduce homelessness and overcrowding.
- This would disproportionately impact:
 - BAME groups, as they are more likely to be in poverty and/or in overcrowded housing and thus in need of affordable housing¹⁰.
 - Households that include children and single parent families (most commonly headed by women¹¹) who are more likely to be impacted by issues of overcrowding.
 - LGBT+ youth who are more likely to be homeless than non-LGBT peers, given increased likelihood of familial rejection¹².

¹⁰ New Policy Institute. London's Poverty Profile 2015 (2011 Census)

¹¹ Around 90% of lone parents (UK wide) are women (ONS 2019)

¹² Albert Kennedy Trust https://www.theproudtrust.org/wp-content/uploads/download-managerfiles/AlbertKennedy_ResearchReport_Youth-Homelessness.pdf

- However, as local policy interventions may mitigate the change to regional policy, the impact of the changes are uncertain in the long term.
- The uncertainty of this impact will not result in a downgrading of the policy's overall score and there is no change to the policy matrix.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

Direction DR4 (including SoS amendment dated 10 December 2020)	Relevant Policies: <ul style="list-style-type: none"> - Policy E4 Land for industry, logistics and services to support London’s economic function - Policy E5 Strategic Industrial Locations (SIL) - Policy E7 Industrial intensification, co-location and substitution - Policy SD1 Opportunity Areas
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1. Assessment:

Brief summary of the extent of changes (March 2020 direction DR4 and December 2020 direction amendment):

Policy and supporting text introducing the no net loss principle in designated industrial locations has been deleted. The industrial property market area and borough level categorisations included in Table 6.2 have also been removed. The definition of industrial floorspace capacity, and the related benchmark for potential floorspace capacity (ie 65% plot ratio), have been deleted from supporting text. Consequential amendments to the removal of the no net loss principle removed supporting text that clarified its application.

New supporting text encourages boroughs with high industrial land vacancy rates to assess whether releasing industrial land for alternative uses might be more appropriate, and whether a substitution approach might support such processes.

New supporting text specifies that when boroughs are considering the release of Green Belt or Metropolitan Open Land to accommodate their housing needs, they might consider re-allocating industrial land in exceptional circumstances, including where land is in active employment use (further direction 10 December 2020).

New policy text directs boroughs to seek the delivery of intensified capacity, where possible, in existing or new locations, and requires boroughs in the Central Services Area to take into consideration the need for last mile services near the CAZ and Northern Isle of Dogs. This largely reinstates the thrust of text deleted elsewhere.

Further policy text has been added to direct boroughs to strategically coordinate their Development Plans to identify opportunities for substitution of SIL in alternative, more appropriate locations, and to encourage boroughs to evaluate viable opportunities to provide additional industrial land in new locations. Policy text directing development proposals for non-industrial uses in SIL to be refused has been deleted. Supporting text has also been amended to remove the expectation that the majority of land in SILs should be retained and intensified for industrial type activities, and to suggest that substitution of selected parts of SILs or LSISs might be appropriate.

Supporting text at Policy SD1 Opportunity Areas has been amended to remove the references to the no net loss principle in paragraphs relating to the Old Kent Road, Lee Valley, Thamesmead and Abbey Wood, and Bexley Riverside OAs.

Overall the changes weaken the strategic protection of designated industrial locations across London and remove the evidence-based borough-level categorisations that provided strategic pan-London directions on how to plan for industrial capacity.

While the majority of the industrial land policies, and their overarching planning objective of retaining and providing sufficient industrial capacity to meet current and future demand, remain the same, the

mechanisms by which this would be realised (the industrial floorspace capacity definition, the ‘no net loss’ principle and the 65% plot ratio) have been substantially removed. This could remove an incentive to intensify industrial land. It also creates uncertainty around how capacity should be assessed for industrial-type activities and around how much industrial capacity London will retain into the future.

This change, combined with a strengthened support for substitution approaches to alternative locations and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances (further direction 10 December 2020), is likely to result in a greater release of designated industrial land to accommodate non-industrial uses, including where such land is in active employment use.

The requirements for Boroughs to coordinate their Development Plans to identify opportunities for substitution of SIL might result in greater cross-boundaries cooperation, and highlight opportunities for joint planning, though it might also result in further erosion of SIL capacity, depending on how this is implemented through Development Plans or masterplans.

Under the changes, it is also more likely that proposals for non-industrial uses in designated industrial locations will be less firmly resisted, particularly where housing demand is high and unmet. This might lead to negative impacts both in terms of industrial operations and functioning of designated industrial locations, as well as in terms of overall residential quality.

Proposed amendments to the direction

Amendments to reflect the correct term for SILs (Strategic Industrial Locations), at Policy E4 (C) and E5 (B)

Consequential numbering changes to reflect updated policy and supporting text references, at Policy E7 (C) and (D) and at footnote 59 (to Policy H5)

Changes to clarify that only local plans (and not masterplans) can identify areas to support substitution processes, at Policy E5 (B) and paragraph 6.7.2.

Changes to align amended paragraph 4.6.8 with Policies G2 and G3 on exceptional circumstances to amend Green Belt and MOL boundaries through Local Plans (further direction 10 December 2020).

Changes to align amended paragraph 4.6.8 with London Plan housing targets rather than housing “need” (further direction 10 December 2020).

Reason: The changes are needed for clarity, and to remove ambiguity and potential confusion around policy interpretation and implementation following the directions.

2. SEA (Strategic Environmental Assessment)

2a. What is the likely or potential impact of the direction on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

Directed changes

- The changes might be interpreted as a less protective approach to designated industrial locations, which might in turn lead to less of a focus on brownfield land for industrial-type developments and not make the most efficient use of land. However, parts of designated

industrial locations and some brownfield sites might be appropriately developed for residential-type developments and this might contribute to making the best use of land in certain locations, particularly where housing need is higher and industrial-type demand is lower.

- Overall the impacts for Policies E4, E5 and E7 are less certain due to the removal of detailed mechanisms in the policies.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 9 Connectivity

Directed changes

- The lower level of protection for designated industrial locations, the strengthened support for substitution processes and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in a greater rate of industrial-type developments being located in the outskirts of London and in the Wider South East. This might in turn have negative implications in terms of traffic congestion in some parts of London, particularly where supply chains and 'just-in-time' services are critical (eg around the CAZ). As industrial-type activities, and logistics functions in particular, might end up being located further away from their final destinations, this might also disincentivise modal shifts to more sustainable forms of distribution.
- Overall, this is likely to result in a general downgrading of the scoring in the short, medium and long term for Policies E4 and E5.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 10 Economic Competitiveness

Directed changes

- The changes are likely to result in rendering more difficult the provision of the right type of employment floorspace in the right places, as the protection for designated industrial locations is lowered, requirements around the re-provision of adequate amounts of industrial floorspace capacity are weakened, residential development proposals in SILs are not unequivocally opposed, and the reallocation of industrial land to accommodate housing needs is supported in exceptional circumstances. These could in turn lead to negative impacts on London's economic competitiveness.
- Overall, this is likely to result in a general downgrading of the scoring in the short, medium and long term for Policies E4, E5, E7 and SD1.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 14 Air quality

Directed changes

- The changes and the stronger support for substitution of industrial capacity to alternative locations and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in some industrial-type activities having to re-locate in the outskirts of London and in the Wider South East. This might have negative implications in terms of air quality in parts of London, as it might lead to increased mileages for industrial-type vehicular movements and, potentially, increases or no significant reductions of NO_x, PM₁₀ and PM_{2.5} emissions. However, the potential impacts of these changes on air quality is largely unknown as it depends on types of vehicles, journeys, and pattern of development of distribution.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 16 Climate change adaptation and mitigation

Directed changes

- The removal of the 'no net loss' principle in designated industrial locations, the strengthened support for substitution of industrial capacity to alternative locations and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances are likely to result in more industrial-type and logistics firms having to re-locate in the outskirts of London and in the Wider South East, as industrial capacity is further eroded in London. This, in turn, might worsen traffic congestion and air quality in parts of London, possibly leading to no significant reductions in terms of transport's contribution to carbon emissions. However, the potential impact of these changes on transport's contribution to carbon emissions is largely unknown as it depends on types of vehicles, journeys, and pattern of development of distribution.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 22 Geology and soils

Directed changes

- The weakened protection of designated industrial locations, and the stronger support for substitution of industrial capacity to alternative locations and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might lead to some industrial-type functions having to re-locate to new greenfield locations in the outskirts of London and beyond. This might, in turn, lead to further soil degradation and might not directly promote the use of brownfield land for industrial-type activities. However, this might also lead to promoting the use of previously industrial brownfield land in designated locations for residential development.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 24 Noise and vibration

Directed changes

- The removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some residential-type developments in designated industrial locations, particularly where housing demand is higher. This change might result in an increase in exposure to noise and vibration for some communities across London, and might not help reducing actual disturbances from noise in certain locations. However, along with other relevant policies such as Policy D14 on noise, Policy E5 E requires that residential development adjacent to SILs should be designed to ensure that industrial activities are not compromised or curtailed, with particularly consideration given to soundproofing and other design mitigation

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

2b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
E4	6. Sustainable Land Use	Short	+	?/+	?/+
		Medium	+	?/+	?/+
		Long	+	?/+	?/+
E4	9. Connectivity	Short	+	0	0
		Medium	+	0	0
		Long	+	-	-
E4	10. Economic competitiveness and employment	Short	+	0	0
		Medium	+	0	0
		Long	++	-	-
E5	6. Sustainable Land Use	Short	+	?/+	?/+
		Medium	+	?/+	?/+
		Long	+	?/+	?/+
E5	9. Connectivity	Short	?	0	0
		Medium	?	0	0
		Long	?	-	-
E5	10. Economic competitiveness and employment	Short	+	0	0
		Medium	++	0	0
		Long	++	+	+
E7	6. Sustainable Land Use	Short	+	?/+	?/+
		Medium	+	?/+	?/+
		Long	+	?/+	?/+
E7	10. Economic competitiveness and employment	Short	+	0	0
		Medium	+	0	0
		Long	++	+	+

SD1	10. Economic competitiveness and employment	Short	+	0/+	0/+
		Medium	+	0/+	0/+
		Long	++	+	+

3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 14 Air quality

Directed changes

- The changes, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some housing developments in designated industrial locations, particularly where housing demand is higher. This change might potentially result in increasing the number of people exposed to particulates and NO₂ in some parts of London, particularly where housing schemes are completed in still-operative designated industrial locations. However, along with other relevant policies such as Policy SI1 on air quality, Policy E5 E requires that residential development adjacent to SILs should be designed to ensure that industrial activities are not compromised or curtailed, with particularly consideration given to air quality and other design mitigation.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 24 Noise and vibration

Directed changes

- The changes, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some housing developments in designated industrial locations, particularly where housing demand is higher. This change might potentially result in increasing the number of people exposed to high levels of noise, including at night-time, with the potential to cause annoyance, sleep disturbance and/or physiological effects. However, along with other relevant policies such as Policy D14 on noise, Policy E5 E requires that residential development adjacent to SILs should be designed to ensure that industrial activities are not compromised or curtailed, with particularly consideration given to soundproofing and other design mitigation.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

3b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

4. CSIA (Community Safety Impact Assessment)

4a. Are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No Impact identified.

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	Yes
Sex	No
Race	Yes
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and inclusion

Directed changes

- The changes, and the lower protection of designated industrial locations in particular, are likely to result in negative impacts on several Equality Impact Assessments objectives, especially on Sustainable Land Use (Objective 6); Connectivity (Objective 9); and Economic Competitiveness and Employment (Objective 10). These changes might more directly affect BAME people and lead to negative impacts in terms of advancing equality of opportunity between BAME people and other people, and in terms of reducing disadvantages and poverty.

Overall, this is likely to result in less certainty and a general downgrading of the scoring in the short, medium and long term for Policies E4, E5 and E7.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 5 Housing Supply, Quality, Choice and Affordability

Directed changes

- The lower level of protection for designated industrial locations, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some housing developments in designated industrial locations, particularly where housing demand is higher. These changes might facilitate the delivery of housing that meets the

needs of Londoners, potentially resulting in an increased supply of new housing stock, including affordable housing. This may positively affect people on lower incomes, and particularly BAME people and single parent families as these groups are more likely to live in households with an average annual income below £20,000, to be in social rented housing or renting private housing¹³, and/or live in overcrowded accommodation¹⁴. However, the impact of these changes is largely unknown as it depends on how these are implemented and managed at a local level.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 6 Sustainable Land Use

Directed changes

- The lower level of protection for designated industrial locations, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some non-industrial developments in designated industrial locations. This might in turn lead to the loss of industrial businesses and eroding existing/potential industrial capacity within designated industrial locations. These changes might have a negative impact by not ensuring that industrial businesses that employ lower paid workers, who would be more likely to be from BAME backgrounds¹⁵, can continue to operate within London. However, the impact of these changes is largely unknown as it depends on how these are implemented and managed at local level.

Overall this is likely to result in less certainty in the short and medium term for Policy E4, E5 and E7, as well as in the longer term for Policy E4 and E5.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 9 Connectivity

Directed changes

- The weakened protection of designated industrial locations, the stronger support for substitution of industrial capacity to alternative locations and for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in some industrial-type activities having to re-locate in the outskirts of London and in the Wider South East. This might have negative impacts by reducing the potential to increase the overall proportion of journeys made by sustainable and active transport modes, as public transport accessibility is generally lower in Outer London and the Wider South East. These impacts are more likely to affect BAME people who are more reliant on the public transport network, and particularly the bus network¹⁶.

Overall this is likely to result in a general downgrading of the scoring in the short, medium and long term for Policy E4.

¹³ Office of National Statistics – 2011 Census

¹⁴ EHRC (2016) Is England Fairer? The state of equality and human rights.

¹⁵ Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

¹⁶ Travel in London: Understanding our Diverse Communities, Transport for London, 2015

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 10 Economic competitiveness and employment

Directed changes

- The changes are likely to result in rendering more difficult to support a diverse and resilient economy providing employment opportunities for all, as the protection for designated industrial locations is lowered, requirements around the provision of adequate amounts of industrial floorspace capacity are weakened, residential development proposals in SILs are not unequivocally opposed and the reallocation of industrial land to accommodate housing needs is supported in exceptional circumstances.. These changes are more likely to negatively affect low paid workers in the wholesale, primary utilities and manufacturing sectors, who are more likely to be from BAME backgrounds¹⁷, as the businesses that employ them might struggle to continue to operate within London.

Overall this is likely to result in a general downgrading of the scoring in the short, medium and long term for Policies E4, E5, E7 and SD1.

Proposed amendments to the direction

- No change to the scoring for the direction.

Objective 14 Air quality

Directed changes

- The changes, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some housing developments in designated industrial locations, particularly where housing demand is higher. This in turn might increase the exposure of people who are more susceptible to emissions and concentrations of harmful atmospheric pollutants, such as very young people and older people¹⁸, particularly where housing schemes are developed in still-operative designated industrial locations. However, along with other relevant policies such as Policy SI1 on air quality, Policy E5 E requires that residential development adjacent to SILs should be designed to ensure that industrial activities are not compromised or curtailed, with particularly consideration given to air quality and other design mitigation.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

¹⁷ Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

¹⁸ Updated Analysis of Air Pollution in London, Aether, February 2017

Objective 24 Noise and vibration

Directed changes

- The changes, the removal of the requirement to refuse planning applications for non-industrial uses in SIL and the support for the reallocation of industrial land to accommodate housing needs in exceptional circumstances might result in the approval of some housing developments in designated industrial locations, particularly where housing demand is higher. This in turn might potentially increase the number of people exposed to high levels of noise and vibration, including at night-time, particularly affecting those individuals that are more sensitive to noise, such as older people¹⁹ and very young children. However, along with other relevant policies such as Policy D14 on noise, Policy E5 E requires that residential development adjacent to SILs should be designed to ensure that industrial activities are not compromised or curtailed, with particularly consideration given to soundproofing and other design mitigation.

No changes to the matrix.

Proposed amendments to the direction

- No change to the scoring for the direction.

5c. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
E4	1. Equality and inclusion	Short	n/a	?/-	?/-
		Medium	n/a	-	-
		Long	n/a	-	-
E4	6. Sustainable Land Use	Short	+	?	?
		Medium	+	?	?
		Long	+	?	?
E4	9. Connectivity	Short	+	0	0
		Medium	+	0	0
		Long	+	0	0
E4	10. Economic competitiveness and employment	Short	+	0	0
		Medium	+	0	0
		Long	++	-	-
E5	1. Equality and inclusion	Short	?	?/-	?/-
		Medium	?	?/-	?/-
		Long	?/-	?/-	?/-
E5	6. Sustainable Land Use	Short	n/a	?	?
		Medium	n/a	?	?
		Long	n/a	?	?
E5	10. Economic competitiveness and employment	Short	+/?	0	0
		Medium	+/?	0	0
		Long	++/?	+	+
E7	1. Equality and inclusion	Short	?	?/-	?/-
		Medium	?	?/-	?/-
		Long	?	?/-	?/-

¹⁹ An Age Friendly City: How far has London Come? Kings College London, 2016

E7	6. Sustainable Land Use	Short	+	?	?
		Medium	+	?	?
		Long	+	+	+
E7	10. Economic competitiveness and employment	Short	+	0	0
		Medium	+	0	0
		Long	++	+	+
SD1	10. Economic competitiveness and employment	Short	+	0/+	0/+
		Medium	+	0/+	0/+
		Long	++	+	+

1. Assessment:**Brief summary of the extent of changes:**

Reference has been added to the national policy tests including those for very special circumstances in the case of development proposals affecting Green Belt and exceptional circumstances in the case of alterations to Green Belt boundaries. The policy text providing support for the extension of Green Belt boundaries and resistance to de-designation of existing Green Belt has been deleted.

The changes reiterate that the NPPF sets the tests for considering proposed development in the Green Belt, and that any review of Green Belt boundaries should be conducted through the Local Plan process. The changes remove the strengthened emphasis on protection of Green Belt and support for expansion from the ITP version of the Plan. The formal policy context both for amending Green Belt boundary changes and for determining planning applications remains unaffected, however the change of emphasis may be interpreted as less protective of Green Belt by decision makers and so could be slightly more likely to lead to a loss of Green Belt land. This is highly dependent on how this is implemented through Local Plans and local planning decisions.

2. SEA (Strategic Environmental Assessment)**2a. What is the likely or potential impact of the direction on any of the objectives with SEA guide questions?**Objective 6 Sustainable Land Use

- The changes may be interpreted as a less protective approach to London's Green Belt, this could in turn lead to less of a focus on brownfield land. However, the protections for Green Belt provided in the NPPF remain, so the overall impact remains positive.

No changes to the matrix.

Objective 9 Connectivity

- The changes may result in proposals in the Green Belt being considered more favourably. Many Green Belt sites have poor levels of connectivity and so increased likelihood of development in these areas could increase the need to travel. However, the protections for Green Belt provided in the NPPF remain so the overall impact remains neutral.

No changes to the matrix.

Objective 20 Natural Capital and Natural Environment

- The change may infer a slightly reduced level of protections of local green spaces such as these relate to London's Green Belt. However, the protections for Green Belt provided in the NPPF remain so the overall impact remains positive.

No changes to the matrix.

3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts identified.

No changes to the matrix.

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	No
Sex	No
Race	No
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

No impacts identified.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

1. Assessment:

Brief summary of the extent of changes:

Policy text directing development proposals that harmed MOL to be refused has been deleted. The requirement to ensure that the overall quantum of MOL is not reduced and that improvements to the overall value of land should be secured in the case of alterations to MOL boundaries has been removed.

The changes reiterate that the NPPF policy tests for Green Belt should be used to assess planning proposals affecting MOL. The majority of the policy and the protection it provides to MOL remains the same, however, under the changes it could be more likely that boundary changes could lead to a reduction in area or value of MOL and that proposals that harm MOL may be considered more favourably. This is however highly dependent on how this is implemented through Local Plans and local planning decisions.

Proposed amendments to the direction

An alteration to the text is proposed to clearly link decision-making regarding MOL boundaries to the criteria in the policy. The proposed amendment is to ensure clarity and does not alter the impacts identified in the IIA. No changes to the matrix.

2. SEA (Strategic Environmental Assessment)

2a. What is the likely or potential impact of the direction on any of the objectives with SEA guide questions?

Objective 6 Sustainable Land Use

- The changes may be interpreted as a less protective approach to MOL, which could in turn lead to less of a focus on brownfield land. However, the protections provided for Green Belt in the NPPF and conferred to MOL by Policy G3 in the London Plan remain so the overall impact remains positive.

No changes to the matrix

Objective 20 Natural Capital and Natural Environment

- The change may infer a slightly reduced level of protection for MOL. However, the protections provided for Green Belt in the NPPF and conferred to MOL by Policy G3 in the London Plan remain, so the overall impact remains positive.

The scoring is slightly lower in the long term but still positive.

2b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
G3	Objective 20 Natural Capital and Natural Environment	Short	+	+	+
		Medium	+	+	+
		Long	++	+	+

3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts identified.

3b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	No
Sex	No
Race	No
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

No impacts identified.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

Direction DR7	Relevant Policy: H14 Gypsy and Traveller Accommodation
<p>1. Assessment:</p> <p>Brief summary of the extent of changes:</p> <p>Deletion of policy text that extended the definition of Gypsy and Traveller persons whose needs should be assessed and planned for by the planning system, beyond that set out in national planning policy. The policy previously ensured that those with a cultural tradition of nomadism or caravan dwelling would be accounted for in needs assessments and consequent pitch targets, regardless of their current travelling status or accommodation. Changes restrict this to only those who travel, or who have ceased travelling due to any dependents' needs on a temporary basis. Supporting text paragraphs (4.14.1 – 4.14.4 and 4.14.7) pertaining to the definition of Gypsy and Traveller need are also deleted. The words 'Gypsy' and 'Traveller' have also been decapitalised throughout the document.</p> <p>Changes will likely result in an underestimation of the true need for Gypsy and Traveller accommodation and consequently, reduced Local Plan pitch targets and less delivery than might otherwise have been achieved. This underestimation is due to the exclusion of Gypsies and Travellers who do not lead a nomadic lifestyle presently, despite cultural and/or ethnic background, and the policy now fails to acknowledge the institutional barriers that have prevented many from doing so. Moreover, in dividing the way that Gypsy and Traveller needs are assessed and accounted for – leaving the needs of those who do not meet the Government's definition to be assessed and met under the Housing and Planning Act 2016 provision for caravan dwellers²⁰ - it fails to maximise opportunities to fully improve health outcomes and mitigate against discrimination and marginalisation, via positive housing interventions through the planning system.</p> <p>The Mayor sought to retain capitalisation, but the SoS rejected this as failing to be consistent with national policy and therefore has not been assessed through this IIA. A minor amendment has been made in the Publication London Plan to address a textual error that arose from the direction, but this is inconsequential.</p>	
<p>2. SEA (Strategic Environmental Assessment)</p> <p>2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>3. HIA (Health Impact Assessment)</p> <p>3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?</p>	

²⁰ Which may be met by Local Housing Authorities through bricks and mortar housing in accordance with Draft guidance to local housing authorities on the periodical review of housing needs (2016)

Objective 3 – Health and Health Inequalities and Objective 5 – Housing Supply, Quality, Choice and Affordability:

- The ten-year pitch targets in Local Plans will likely be lower as a result of the change, thus accommodation planned for and delivered through the policy framework will only meet a proportion of Gypsy and Traveller need. This will help to alleviate homelessness and overcrowding for some families (those who meet the Government’s definition of Gypsies and Travellers) but fails to address these issues for others.
- Given that two thirds of Gypsies and Travellers report health as poor, bad or very bad and living conditions and housing insecurity contribute to physical and mental health²¹, a reduction in the delivery of suitable, secure accommodation (and associated infrastructure) will miss opportunities to mitigate and improve upon physical and mental health outcomes for many within this community.

Overall, the introduction of this policy will still have positive impacts compared to the status quo, however the changes introduced by the Direction will result in a downgrading of the scoring in the short, medium and long term for H14.

3b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
H14	Objective 3 Health and Health Inequalities	Short	++	+	+
		Medium	++	+	+
		Long	++	+	+
	Objective 5 Housing Supply, Quality, Choice and Affordability.	Short	++	+	+
		Medium	++	+	+
		Long	++	+	+

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	Yes
Age	Yes
Sex	No
Race	Yes
Religion	No
Sexual orientation	No

²¹ Impact of insecure accommodation and the living environment on Gypsies’ and Travellers’ health: The Traveller Movement (2016).

Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	Yes

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 - Equality and Inclusion and Objective 2 – Social Integration:

- Decapitalising the words ‘Gypsy(ies)’ and ‘Traveller(s)’ may have a negative impact by weakening the link between this group and their ethnic identity.
- Excluding a proportion of Gypsy and Traveller persons needs from being planned for by the planning framework is likely to result in exclusion of members of the community with protected characteristics – negatively impacting on their ability to participate in the planning system in relation to specific housing needs.
- Accounting for and meeting the needs of travelling and non-travelling Gypsies and Travellers in different ways is likely to lead to pitch provision and improved access to social infrastructure – including educational opportunities and health care - for some members of the community and not others over the plan period.
- This is particularly likely to impact upon the characteristic of race, given that many Gypsies and Travellers are protected through the Equality Act on the grounds of their ethnic identity, however the Gypsy and Traveller community will also comprise those with all other protected characteristics and who may experience disproportionate impacts.
- In failing to account for the non-travelling persons through the planning system, it becomes more challenging to promote equality and foster good relations between those with a protected characteristic and those without, both within Gypsy and Traveller communities and beyond.
- The planning and delivery of new pitches (and the associated access to health, education and social infrastructure) may result in a reduction in social exclusion, and promote equality, fairness and respect for some Gypsies and Travellers, however due to the likelihood of lowered pitch targets and less delivery, likely direct positive impacts are also reduced in the longer term and the matrix scoring is downgraded.

Objective 3 - Health and Health Inequalities:

- Two thirds of Gypsies and Travellers report health as poor, bad or very bad. Living conditions and housing insecurity contribute to physical and mental health. Failing to deliver appropriate accommodation and associated infrastructure for non-travelling gypsies and travellers – many of whom will identify as a Gypsy or Traveller by ethnic origin - will miss opportunities to mitigate and improve upon their physical and mental health outcomes.
- The impacts resulting from a lack of secure accommodation with access to supporting health and social infrastructure, will be exacerbated for those with a disability, older persons (who are also more likely to themselves have a disability or poor health outcomes) and potentially pregnant and nursing mothers.

Overall, given that some members of these communities will experience positive impacts whilst others will not, the scoring is downgraded in the medium and long term.

Objective 5 - Housing Supply, Quality, Choice and Affordability:

- Gypsies and Travellers have been subject to significant under-provision of pitches in London and continue to suffer from accommodation insecurity and lack of adequate housing choice that meets their needs. Pitch targets in development plans will continue to have a positive impact on bringing forward the quantum and type of housing needed to meet some need. However, as

changes are likely to mean less provision available for non-travelling persons who identify as Gypsies or Travellers through ethnic background, positive impacts are reduced.

- If decapitalising the words ‘Gypsy(ies)’ and ‘Traveller(s)’ weakens the link between this group and their ethnic identity, this in turn may weaken the justification that decision makers may have, to argue that the optimal site capacity for a location should take their needs into account.
- Some mitigation may be provided outside of the planning system whereby the needs of households that fall outside of the planning definition (e.g. Romany Gypsies and Irish and Scottish Travellers) are to be assessed and met by local authorities under provision of the Housing and Planning Act (2016). There is however no requirement in legislation to meet such need through caravan and pitch provision, and so any potential mitigation that this offers against reduced pitch targets is minimal. In this case, some households may be able to demonstrate a cultural need and right to a caravan site under the Equalities Act (2010) and case law associated with the Human Rights Act, however, this relies on individual members of the community to have the resources available to do so.
- Overall, positive impacts are reduced and the IIA scoring is downgraded in the medium and long term.

5c. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
	Objective 1 Equality and Inclusion	Short	+	+	+
		Medium	++	+	+
		Long	++	+	+
	Objective 2 Social Integration	Short	+	+	+
		Medium	+	+	+
		Long	++	+	+
	Objective 3 Health and Health Inequalities	Short	+	+	+
		Medium	++	+	+
		Long	++	+	+
	Objective 5 Housing Supply, Quality, Choice and Affordability.	Short	+	+	+
		Medium	++	+	+
		Long	++	+	+

1. Assessment:**Brief summary of the extent of changes:**

The Secretary of State (SoS) Direction replaces Table 10.3 with modified residential parking standards. These change the Intend to Publish (ItP) standards for outer London PTALs 0-4, and modifies the standards such that they now vary by the size of the dwelling (with 3+ bedroom dwellings having higher provision). The maximum parking standards in PTAL 0, 1, 3 and 4 would increase as a result of the Direction, with a slight reduction in PTAL 2 for 1-2 bedroom units. Overall the direction would be likely to result in an increase in parking provision in new developments in outer London.

Proposed amendments to the direction:

For 1-2 bed dwellings in outer London PTAL 4, to set the maximum parking standard as a range from 0.5 to 0.75 spaces per dwelling.

For 3+ bed dwellings in outer London PTAL 4, to set the maximum parking standard as a range from 0.75 to 1 space per dwelling.

To add a footnote that would clarify that the lower standard in the range should be applied as a maximum when considering development proposals that are higher density or in more accessible locations.

Reason: This approach reflects the SoS Direction while recognising that PTAL 4 areas are very well connected by public transport, particularly in the national context, and may have potential for higher density development that high parking provision could undermine. The footnote would provide some clarity as to the circumstances in which the higher or lower figures in the range should be applied as a maximum.

2. SEA (Strategic Environmental Assessment)**2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?**Objective 6 Sustainable land use

- The SoS Direction would encourage and enable more car use, which is an inefficient mode of transport compared to other modes that carry more people for the same amount of space. Furthermore, the space required to deliver car parking (which could be approximately 60,000 sqm) could be used for additional dwellings, and therefore residential densities are likely to be reduced. The changes would increase car parking provision where the road network is constrained and congested (including, but not limited to, outer London PTAL 4), increasing the likelihood of situations where optimum housing densities cannot be permitted as they would have unacceptable impacts on the local road network.

- The relative impact of the Direction could be limited by the fact that the Direction does not affect parking standards in inner London, outer London areas of PTAL 5-6 and outer London Opportunity Areas. Overall – through increased land-take and lower residential densities – the Direction would use land inefficiently and not support sustainable patterns of development and therefore it results in a general downgrading of the scoring in the short, medium and long term.

Proposed amendments to the Direction

- The proposed amendment would lessen the impacts of the Direction on the sustainable use of land. The extent of this would depend on the implementation of the policy; the range approach for PTAL 4 outer London dwellings makes the likely impacts of the policy difficult to predict.

Objective 7 Design

- The greater level of car use that is likely to result from increased parking provision, as well as the physical presence of additional spaces, will impact on the attractiveness and vibrancy of public realm by making it less pleasant to walk and cycle. This may also result in negative visual impacts on town/cityscapes and the character of areas. However, the impact of the Direction is limited as for most areas in London the parking standards remain unchanged. Other policies in the Plan may also mitigate negative design outcomes such as T2 Healthy Streets.

Proposed amendments to the Direction

- The proposed amendments would partially mitigate the negative impacts set out above, however the extent to which this would be the case would depend on the implementation of the policy; this is made less certain by the introduction of a range of maximum parking standards.

No changes to the matrix.

Objective 9 Connectivity

- Increasing the amount of residential car parking available is likely to result in increased car use and therefore congestion. Furthermore, this is likely to have a knock-on impact on bus performance and the movement of road-based freight. By catering for higher levels of car ownership (and therefore use), and by reducing the attractiveness of some forms of sustainable travel (for example by reducing bus speeds, or rendering walking and cycling environments less attractive), the SoS Direction is likely to inhibit mode shift to sustainable forms of transport. Adding traffic to London's constrained road network is also likely to affect road-based freight.
- The SoS Direction would increase provision of car parking in outer London specifically. Outer London is where the greatest need for behaviour change is in order to meet the Mayor's strategic mode share target; and the SoS Direction will make this more challenging. Outer London accounts for 70% of London's volume of traffic²² and existing car ownership is also higher than inner or central London²³. Increased parking provision will intensify these problems. Within outer London, the Direction increases parking provision in PTAL 4, which are well-connected areas. Increasing parking provision in these areas poses particular problems for meeting mode shift

²² Transport for London (2019) Travel in London

²³ Integrated Transport Planning on behalf of Greater London Authority and Transport for London (2017) Understanding and Managing Congestion

target as it hinders the ability to capitalise on the availability of public transport and the proximity of amenities and services.

- Although the SoS Direction leaves the parking standards for many areas unaffected, overall, the changes result in a general downgrading of the scoring in the medium and long term.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 14 Air quality

- Increased car use, driven by increased provision of residential car parking is likely to increase the emission of harmful pollutants such as NO_x, PM_{2.5} and PM₁₀. Where the impact of the standard is more concentrated, for example in PTAL 4 areas, this may lead to local exceedances of legal limits or a delay to the date at which legal air quality obligations are met. The SoS Direction therefore results in a general downgrading of the scoring in the medium and long term.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 15 Climate change adaptation and mitigation

- Increased carbon emissions are likely to occur as a result of the SoS Direction from increased car use and reduced modal shift to more sustainable modes of transport. Given that road transport accounts for a smaller proportion of carbon emissions than it does in the case of pollutants that contribute to poor air quality, the SoS Direction does not result in a change to the scoring matrix.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 24 Noise and vibration

- Increased car use may result in greater levels of noise pollution. However, the impact of this increase is likely to vary by local context (for example, the level of background noise) and so the scoring matrix has not been changed.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

2b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.1	6. Sustainable Land Use	Short	+	+/O	+/?
		Medium	+	+/O	+/?
		Long	+	+/O	+/?
	9. Connectivity	Short	O	O	O
		Medium	+	+/O	+/?
		Long	+	+/O	+/?
	14. Air quality	Short	O	O	O
		Medium	+	+/O	+/?
		Long	++	+	+

3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 1 Equality and inclusion

The SoS Direction would encourage more car use in London, which is a less active mode of travel. This is also likely to discourage walking and cycling by making street environments less attractive and reducing the convenience of some forms of public transport (such as buses) by adding to road congestion. As well as incentivising less active travel choices, the SoS Direction may also discourage some trips from taking place in the first instance and therefore limit opportunities to choose an active, fulfilling life.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 2 Social integration

- As described above under Objective 1, by discouraging travel, the SoS Direction may limit some peoples' participation in city life and reduce social integration. Increased levels of severance cause by increase congestion and generally more dominance of public space by cars (or car infrastructure such as roads and parking space) may reduce the opportunities for interaction between communities.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 3 Health and health inequalities

- Increased parking provision – through making car use more convenient and reducing the attractiveness of walking, cycling and public transport - is likely to lead to lower levels of physical activity and therefore negative impacts on health. The SoS Direction may also cause localised worsening of air quality, with negative consequences for human health as well as exacerbating health inequalities (further discussed in the EqIA). For these reasons, the scoring against this objective has been downgraded moderately.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 9 Connectivity

More car-dominated streets are likely to discourage walking and cycling in London and the increased provision of car parking is likely to impact negatively on the desired shift to sustainable modes. As the relationship of this negative impact on connectivity to health will vary significantly according to local factors, no changes to the matrix have been made.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 14 Air quality

- The increased car use that is likely to arise from the SoS Direction would result in increased emission of harmful pollutants (in particular, particulate matter and nitrogen dioxide) and exposure to these. Given that the SoS Direction includes areas of PTAL 4, which are typically more densely populated, increased exposure may be a particular problem. Given that road transport is the source of around a half of nitrogen dioxide and particulate matter (PM10 and PM2.5) emissions, these impacts result in a general downgrading of the scoring against this objective.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 15 Climate change adaptation and mitigation

Increased emissions from greater car use may cause local worsening of the micro-climate and may exacerbate the urban heat island effect. Across London as a whole, the residential parking standards should however reduce emissions and help to mitigate the impacts of climate change.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 24 Noise

- Increased car use may lead to greater levels of noise and exposure to high levels of noise, with negative impacts on health. However, as discussed in the SEA, the impact of this increase is likely to vary by local context (for example, the level of background noise) and so the scoring matrix has not been changed overall.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

3b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.1	3. Health and health inequalities	Short	+	+/O	+/?
		Medium	+	+/O	+/?
		Long	+	+/O	+/?
	14. Air quality	Short	+	+/O	+/?
		Medium	+	+/O	+/?
		Long	+	+/O	+/?

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4. Crime, safety and security

- By providing more parking and therefore encouraging car use, the SoS Direction may result in increased levels of road danger. Greater car use and congestion can also often lead to severance and perceptions of unsafe streets, and consequently lower levels of walking and cycling.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No change to the scoring matrix.

Objective 9 Connectivity

By increasing the dominance of cars over streets and public spaces, the SoS Direction is likely to make walking and cycling routes less safe and appealing, therefore discouraging active travel.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

- **EqIA - Equality Impact Assessment**

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	Yes
Age	Yes
Sex	Yes
Race	Yes
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	Yes

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 1 Equality and inclusion

The SoS Direction would encourage more car use in London, which is a less active mode of travel. This is also likely to discourage walking and cycling by making street environments less attractive and reducing the convenience of some forms of public transport (such as buses, the use of which is important for or more prevalent amongst older and younger Londoners, BAME groups, women and disabled Londoners) by adding to road congestion. As well as incentivising less active travel choices, the SoS Direction may also discourage some trips from taking place in the first instance and therefore limit opportunities to choose an active, fulfilling life. This is particularly the case for older and disabled Londoners, for whom accessibility by active modes of travel is likely to be negatively affected, as well as BAME groups, pregnant Londoners, younger and older Londoners and disabled Londoners due to the potential for worsened air quality and safety concerns.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 2 Social integration

- By encouraging more car travel and making walking and cycling environments less appealing (for example, by creating severance), the SoS Direction may reduce the opportunities for interaction between communities and therefore harm social integration.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 3 Health and health inequalities

- The SoS Direction could lead to a worsening of air quality, reductions in physical activity levels and disproportionate impacts on some groups who share protected characteristics. This includes younger and older Londoners, who are less likely than other age groups to meet recommended levels of physical activity²⁴ and who are disproportionately affected by road danger²⁵. Young Londoners are also more susceptible to the health consequences of poor air quality than the general population²⁶ and poor air quality has been shown to have negative impacts during pregnancy, including being directly attributable to low birth weight²⁷. Places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂)²⁸. Therefore, increasing pollutant emissions from road transport by increasing parking provision and car use may have a disproportionate negative impact on these groups. Research suggests that disabled pedestrians in the UK are four times more likely to be injured by a motor vehicle than non-disabled pedestrians, and greater car use could worsen this road danger inequality²⁹.
- The change to the policy results in a general downgrading of the scoring against this objective.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

²⁴ British Heart Foundation (2015) Physical Activity Statistics

²⁵ Transport for London (2014) Pedestrian Safety Action Plan

²⁶ Aether (2013) Analysing Air Pollution Exposure in London

²⁷ Aether (2013) Analysing Air Pollution Exposure in London

²⁸ Aether (2017) Updated Analysis of Air Pollution in London.

²⁹ University of Westminster (2018) Road Injuries in the National Travel Survey: Under-reporting and Inequalities in Injury Risk

Objective 5 Housing supply, quality, choice and affordability

- As discussed under the Strategic Environmental Assessment, the land-take required to provide additional parking could be at the expense of additional dwellings. Furthermore, where the increased provision of car parking manifests itself in more costly car park designs (such as basements), the greater cost of construction may result in other infrastructural requirements of the Plan (e.g. adequate affordable housing, open/green space, social infrastructure etc.) not being delivered. This is more likely to occur on smaller, constrained sites that can accommodate higher densities. Outer London PTAL 4, which is impacted by the SoS Direction, is likely to contain such sites.
- Combined with the potential reduced densities resulting from higher parking provision, the SoS Direction may restrict housing supply and provision of affordable housing. This is likely to have a greater impact on groups that are more likely to be on lower incomes, such as disabled and BAME Londoners. These negative impacts are already captured in the scoring matrix and partially mitigated by the fact that the parking standards remains unaffected by the SoS Direction for many areas of London.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 7 Design

- By increasing the dominance of cars in the public realm and creating severance, the SoS Direction is likely to reduce the accessibility of streets, which may disproportionately impact older Londoners and Londoners with disabilities by creating barriers to moving around the city.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the matrix.

Objective 8 Accessibility

- The SoS Direction could make walking and cycling harder and reduce the accessibility of streets, which is likely to disproportionately impact on older and disabled Londoners. The Direction could also reduce the performance of some bus services by adding to road congestion. London's bus network is nearly entirely accessible. In addition, greater car use is likely to lead to more severance and less accessible walking environments, for which the impacts on disabled Londoners may be more severe.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

No changes to the scoring matrix.

Objective 9 Connectivity

- By encouraging car use, the SoS Direction would increase traffic volumes and contribute to making walking and cycling environments less appealing as well as creating severance. The changes to the policy are therefore likely to have a negative impact on younger and older Londoners as well as disabled Londoners, as they are disproportionately affected by road danger.
- The Direction is also likely to affect bus speeds in some areas of London and therefore will affect women, who are more likely to use the bus than men³⁰, older Londoners, for whom buses are the most used mode of transport³¹, disabled Londoners who rely more on buses as a highly accessible mode of transport, and BAME Londoners, who are more likely to use buses than the rest of the population³².
- The scoring against this objective has therefore been downgraded over the medium and longer term.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 14 Air quality

- As discussed in the SEA and HIA, the SoS Direction is likely to encourage greater levels of car ownership and use and therefore contribute to increased emissions of harmful pollutants. Although the impact of the SoS Direction will be influenced by local conditions such as road network capacity and the level of congestion on these roads, the changes to the policy are likely to cause local worsening of air quality.
- Furthermore, the changes to the policy apply to areas that are typically higher density (e.g. PTAL 4), where exposure to poor air quality may be high. Young Londoners are also more susceptible to the health consequences of poor air quality than the general population³³ and poor air quality has been shown to have negative impacts during pregnancy, including being directly attributable to low birth weight³⁴. Places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂)³⁵. Therefore, increasing pollutant emissions

³⁰ Transport for London (2015) Travel in London: Understanding our Diverse Communities

³¹ Ibid

³² Transport for London (2015) Travel in London: Understanding our Diverse Communities

³³ Aether (2013) Analysing Air Pollution Exposure in London

³⁴ Aether (2013) Analysing Air Pollution Exposure in London

³⁵ Aether (2017) Updated Analysis of Air Pollution in London.

from road transport by increasing parking provision and car use may have a disproportionate negative impact on these groups.

- The scoring against this objective has therefore been moderately downgraded.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

Objective 24 Noise and vibration

- By encouraging car use, the SoS Direction could contribute to noise pollution and exposure to it. However, the impact of this increase is likely to vary by local context (for example, the level of background noise) and so no the scoring matrix has not been changed.

Proposed amendments to the Direction

- The proposed amendments may partially mitigate the negative impacts set out above, depending on the implementation of the policy.

5c. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.1	1. Equality and inclusion	Short	O	O	O
		Medium	+	+/O	+/?
		Long	++	+	+
	3. Health and health inequalities	Short	O	O	O
		Medium	+	+/O	+/?
		Long	+	+/O	+/?
	9. Connectivity	Short	?	?	?
		Medium	+	+/O	+/?
		Long	+	+/O	+/?
	14. Air quality	Short	O	O	O
		Medium	+	+/O	+/?
		Long	+	+/O	+/?

1. Assessment:**Brief summary of the extent of changes:**

The Secretary of State (SoS) Direction inserts a new clause into part A of the policy T6.3 which allows boroughs to set their own retail parking standards rather than apply those in table 6.5, taking into account a new set of criteria in a new part G of the policy which allows alternative standards where it is considered the standards in table 10.5 would result in a diversion in demand away from town centres or significant reduction in the viability of mixed use redevelopment proposals in the town centre.

Where boroughs set higher parking standards this could increase use. The availability of destination parking, including retail, is a major influence over the decision use a car in London. By making it more convenient to park at retail locations (and at home, as proposed by DR8) car ownership and use is likely to increase. The increase in retail parking maximum standards could potentially lead to greater car use and undermine the ability to create high quality public realm in town centres.

2. SEA (Strategic Environmental Assessment)**2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?**Objective 6: Sustainable land use

- Increased parking provision, where there are higher maximum retail parking standards in Local Plans, is likely to lead to an increased land-take and less space for other town centre uses thereby using land less efficiently and not support sustainable patterns of development. This could lead to a minor negative effect on this objective in the short, medium and long term, however the extent of the impact depends on how this is taken forward in Local Plans.

Objective 7: Design

- Increased parking provision, where there are higher maximum retail parking standards in Local Plans, is likely impact on the attractiveness and vibrancy of public realm by making it less pleasant to walk and cycle. This could lead to a minor negative effect on this objective in the medium and long term, however the extent of the impact depends on how this is taken forward in Local Plans.

Objective 9: Connectivity

- Increased parking provision, where there are higher maximum retail parking standards in Local Plans, is likely to lead to increased levels of traffic and congestion as well as reduce use of public transport particularly in well-connected locations therefore having a negative impact on mode shift depending on how it is taken forward through Local Plans. This could lead to a minor negative impact in the medium to long term however the extent of the impact depends on how this is taken forward in Local Plans.

Objective 10: Economic competitiveness and employment

- Increased levels of parking in town centres, where there are higher maximum retail parking standards in Local Plans, could have a negative impact on their function through taking up increased land that could otherwise be used for retail and employment use, as well as increased traffic and congestion leading to a poorer quality environment that reduces the attractiveness of town centres for visitors. Whilst this could lead to a minor negative effect on this objective depending on how this is taken forward at the borough level there is no overall change to the scoring.

No changes to the matrix.

Objective 14: Air Quality

- Where increased parking levels leads to increase car use and congestion this is likely to lead to resultant impacts on air quality (from increased car use and congestion) could also have negative impacts on health and health inequalities depending on how it is implemented at the borough level.

Overall this could lead to more uncertainty in the medium term and less of a positive impact in the longer term.

Objective 16: Climate Change

- Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to undermine attempts to reduce emissions that contribute to climate change depending on the type of parking space provided. This could lead to a minor negative impact in the medium to long term depending on how it is implemented at the borough level however it is unlikely to change the overall scoring.

No changes to the matrix.

Objective 24: Noise and vibration

- Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to increase noise pollution. This could lead to a minor negative impact in the medium to long term depending on how it is implemented at borough level however it is unlikely to change the overall scoring.

No changes to the matrix.

2b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.3	Objective 6: Sustainable land use	Short	+	+/?	+/?
		Medium	+	+/?	+/?
		Long	+	+/?	+/?
	Objective 7: Design	Short	0	0	0
		Medium	+	+/?	+/?
		Long	+	+/?	+/?
	Objective 9: Connectivity	Short	0	0	0
		Medium	+	+/?	+/?
		Long	+	+/?	+/?

	Objective 14: Air quality	Short	O	O	O
		Medium	+	+/?	+/?
		Long	++	+	+

3. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

Objective 3 Health & Health inequalities

- Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to lead to increased car use and congestion which would have negative impacts on health and health inequalities, whilst reduced opportunities for modal shift to sustainable and active modes of travel (by increasing the convenience of car use and ownership) would have negative consequences for health through reduced levels of physical activity. This could lead to a minor negative impact on the short, medium and long term depending on implementation at.

Objective 14: Air Quality

- Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to lead to increased car use and congestion. This could have negative impacts on air quality in the short, medium and long-term, however the extent of the impacts will depend on local implementation.

3b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.3	Objective 3: Health and health inequalities	Short	+	+/?	+/?
		Medium	+	+/?	+/?
		Long	+	+/?	+/?
T6.3	Objective 14: Air Quality	Short	+	+/?	+/?
		Medium	+	+/?	+/?
		Long	+	+/?	+/?

4. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

Objective 4: Crime, safety and security

- Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely impact on the attractiveness and vibrancy of public realm by making it less pleasant to walk and cycle. Increased congestion and car dominance could lead to increased perceptions of the environment not being safe for pedestrians and cyclists and minor negative impacts in the medium to long term depending on local implementation.

4b. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.3	Objective 4: Crime, safety and security	Short	O	O	O
		Medium	+	+/?	+/?
		Long	+	+/?	+/?

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	Yes
Sex	No
Race	Yes
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	Yes

5b. If yes, summarise the impact on the protected characteristic(s).

Objective 3: Health and Health Inequalities

Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to lead to increased car use and congestion which is likely to have negative impacts on air quality in the medium and long-term depending on local implementation. This could have disproportionate impacts for several protected characteristics as set out in objective 14 below.

Objective 14: Air Quality – see above.

Increased parking provision, where this leads to higher maximum parking standards in local plans, is likely to lead to increased car use and congestion which could have negative impacts on air quality in the short, medium and long-term which could impact on several protected characteristics. In particular:

- Poor air quality can have disproportionate impacts on children and older people, in particular those with respiratory conditions such as asthma.
- Poor air quality can have negative impacts during pregnancy affecting both mother and baby. Studies in London have shown that air pollution is having a detrimental impact upon babies' health before they are born and is directly attributable to low birth weight.
- Evidence on air quality suggests that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂).

The extent of the impacts will depend on how standards are taken forward at the local level. The scoring has been updated to reflect this uncertainty.

5c. Would the scoring of any of the objectives be changed?

Policy	Objective		ItP	SoS	PLP
T6.3	Objective 3: Health and Health Inequalities	Short	0	0	0
		Medium	+	+/?	+/?
		Long	+	+/?	+/?
	Objective 14: Air quality	Short	0	0	0
		Medium	+	+/?	+/?
		Long	+	+/?	+/?

Direction DR11	Relevant Policy: H1 Increasing housing supply
<p>1. Assessment:</p> <p>Brief summary of the extent of changes:</p> <p>Deletion of supporting text (paragraph 4.1.11). This paragraph stated that the Government’s housing delivery test (HDT) should not unfairly penalise boroughs where housing delivery has been constrained due to factors outside of their control. Recognising increased housing targets of the new Plan, the paragraph also suggested that as delivery increases over time (as policies bed down) this should also be accounted for in monitoring delivery throughout the plan period.</p> <p>The paragraph subject to the Direction did not alter the calculation method or publication of the Government’s annual housing delivery test. However, the introduction of individual borough stepped housing delivery targets - which vary over the ten-year plan period - would both allow for delivery increases over time to be accounted for by monitoring and alter the annual targets tested by the HDT. Supporting text (para 4.1.10) encourages boroughs to set realistic, stepped housing delivery targets (where appropriate) reflecting projected supply increases over the plan period, thus the ability to ensure delivery can increase over time to prevent HDT failure in the early plan period is retained. Overall, the change has no material impact on IIA objectives.</p>	
<p>2. SEA (Strategic Environmental Assessment)</p> <p>2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?</p> <p>No impacts identified.</p> <p>2b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>3. HIA (Health Impact Assessment)</p> <p>3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?</p> <p>No impacts identified.</p> <p>3b. Would the scoring of any of the objectives be changed?</p> <p>No changes to the matrix.</p>	
<p>4. CSIA (Community Safety Impact Assessment)</p> <p>4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?</p> <p>No impacts identified.</p>	

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

5. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	No
Sex	No
Race	No
Religion	No
Sexual orientation	No
Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

No impacts identified.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

6. Assessment:**Brief summary of the extent of changes:**

The Directed changes introduce new text into Part A which defines the minimum height for a tall building including for any local borough definition. Part B 3) has been clarified with additional text in reference to the type of locations that should be identified on maps in Development Plans.

New text has been introduced into paragraph 3.9.3 which sets out additional detail in relation to the definition of a tall building as set out in part A and clarifies assessment requirements for buildings of a lesser height in order to ensure that development of this nature is appropriate for its location and does not lead to unacceptable impacts on the local area.

The existing general definition for a tall building (where no local definition is in place) under paragraph 3.9.3 has been removed in favour of the new definition as above.

- **SEA (Strategic Environmental Assessment)**

2a. What is likely or potential impact of the direction on any of the objectives with SEA guide questions?Objective 6 Sustainable Land Use

- The new text may reduce ambiguity in how the policy is interpreted and applied and bring forward a more consistent approach to tall buildings across London, which may make it easier to ensure best use of land through appropriate development.

Overall no change to the scoring.

Objective 7 Design

- Defining what the minimum height of a tall building should be will help to reduce ambiguity around the interpretation of the policy for boroughs when they define their local definition. It will also create more certainty for all stakeholders about what future growth is likely to look like in their local area.
- Clarifying assessment requirements for buildings of a lesser height than what is defined as a tall building will help to ensure that development of this nature is appropriate for its location and does not lead to unacceptable impacts on the local area.
- Removing the general definition of a tall building (applicable only where no local definition has been defined) and replacing it with a definition which identifies a lower minimum height threshold may result in additional development proposals being assessed as a tall building. Additional scrutiny of said proposals may help to ensure that appropriate development is brought forward which is respectful of and responds to local character and context.

Overall no change to the scoring.

Objective 11 Infrastructure

- Refining the definition of a tall building may help to work out future infrastructure requirements to accommodate future growth.

Overall no change to the scoring.

Objective 21 Historic Environment

- Clarifying that buildings of a lesser height than the new definition are not automatically acceptable and that proposals will still need to be assessed in the context of other planning policies to ensure that they do not lead to unacceptable impacts on the local area will help to ensure that the historic environment, including heritage assets and their setting, is protected and that this is considered in the context of any new development proposal.

Overall no change proposed to the scoring.

2b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

7. HIA (Health Impact Assessment)

3a. are the changes likely to have an impact on any of the objectives with HIA guide questions?

No impacts identified.

3b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

8. CSIA (Community Safety Impact Assessment)

4a. are the changes likely to have an impact on any of the objectives with CSIA guide questions?

No impacts identified.

4b. Would the scoring of any of the objectives be changed?

No changes to the matrix.

9. EqIA - Equality Impact Assessment

5a. are the changes likely to have an impact on one or more protected characteristics?

Protected characteristic	Impact
Disability	No
Age	No
Sex	No
Race	No
Religion	No
Sexual orientation	No

Gender reassignment	No
Marriage & civil partnership	No
Pregnancy & maternity	No

5b. If yes, summarise the impact on the protected characteristic(s).

No impact identified.

5c. Would the scoring of any of the objectives be changed?

No changes to the matrix.

Annexes to be inserted in version for publication as follows:

Annex 1 Secretary of State's Directions issued 13 March and 10 December 2020 – As set out in Annex J to MD2594 (Secretary of State's Annex only) and Annex K to MD2594 (Secretary of State's Annexes only)

Annex 2 Schedule of Modifications to the Intend to Publish London Plan - As set out in Annex C to MD2594

Annex 3 Guide Questions for the Integrated Impact Assessment – As set out in Table “The IIA Framework – objectives and key guide questions” on pages 5 to 8 of Annex V to MD2594