

Document Area	Doc ref	Topic	Respondent	Summary of comment	GLA response
Overall	0	General	Historic England	The IIA should be reviewed in the context of Historic England's Advice Note 8 (HEAN8) to ensure that protection of the historic environment is taken into account at all stages of developing the spatial development strategy	Amend
Proposed Approach	3.4	IIA Process	Historic England	Reference to the NPPF has been omitted	Amend
Baseline	5.7	Sustainable Land Use	Historic England	More recognition is needed for the heritage dimension of land use, particularly in the CAZ and town centres	Amend
Baseline	5.7.15 - 5.7.22	Accommodating Growth	Historic England	There are challenges of delivering growth in places with distinct character/heritage value. The existing characteristics of places must be considered when proposing higher densities	Amend
Baseline	5.13	Culture	Historic England	The inclusion of culture and separation of it from the historic environment is welcomed. However there are clear links between the two which should be reflected in the IIA. Many of London's cultural facilities and spaces are designated heritage assets. The potential harm to heritage assets through poor investment/inappropriate uses and proposals for change should be recognised alongside the risk of cultural facilities being lost.	Amend - see paragraph 5.13.6 and Culture key issues
Baseline	5.20	Townscape, Landscape and Public Realm	Historic England	The focus on the physical character does not necessarily capture all the tangible and intangible interests of spaces that people value. Under 'issues' potential impacts and harm to the distinct character of places as a result of poor design should be identified. Under 'opportunities' the possibility of developing better contextual townscape design should be included to help support and justify the proposed IIA objective	Amend - see Townscape key issues and opportunities, [discuss contextual design issue]
Baseline	5.21	Historic Environment	Historic England	Paragraph 5.21.2 should be expanded to better recognise the breadth and depth of London's historic environment. Historic England's strategic character and density map ( <a href="https://content.historicengland.org.uk/content/docs/get-involved/allies-morrison-london-local-character-density-final-report.pdf">https://content.historicengland.org.uk/content/docs/get-involved/allies-morrison-london-local-character-density-final-report.pdf</a> ) could be useful to understand the historical development of London. Reference should also be made to locally designated heritage assets, Archaeology Priority Areas (APAs) and the Greater London Historic Environment Record (GLHER) as a source of information.	Included in Plan

Baseline	5.21.4 - 5.21.7	Protected Views	Historic England	Reference should be made to Protected Silhouettes and dynamic views, it should also be recognised that views are not a replacement for understanding the setting of heritage assets. The inclusion of Heritage at Risk details and figures are welcomed, more should be added on the reasons for assets being on the register. The IIA should reflect on opportunities for investing in heritage assets and recognise the economic benefits this brings to London. The IIA objective should recognise that inappropriate development can harm the significance of heritage assets and the wider historic environment and not focus purely on development pressure	Amend
Key Issues	6.1	Historic Environment	Historic England	The table should be amended in line with comments on 5.21 to reflect the national policy/legislation protection for heritage, and to recognise the potential harm of inappropriate development on the setting of assets	Amend
IIA Framework	7	IIA Framework	Historic England	The IIA should sufficiently test the implications of the London Plan. The key questions which should be asked for the SEA/SA include: Conserve and/or enhance heritage assets, their setting and the wider historic environment? Contribute to the better management of heritage assets and tackle heritage at risk? Improve the quality and condition of the historic environment? Respect, maintain and strengthen local character and distinctiveness? Questions such as 'minimise the the impact on the setting of heritage assets' is contrary to national policy. The tests seek to first avoid causing harm, then explore how to mitigate harm. The question of respecting visual amenity does not successfully relate to heritage issues and should be deleted. In terms of the EQIA and HIA one or more of the following questions would be more appropriate: Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? Engage communities in indentifying cultutally important features and areas? Provide for increased access to and enjoyment of the historic environment? Provide for increased understanding and interpretation of the historic environment?	Amend
Appendices	Appendix D	Testing compatibility of the IIA objectives	Historic England	It is not necessarily the case that historic environment objectives are incompatible with the housing, land use and economic competitive IIA objectives. These can be compatible through the development and implementation of the right policies. Historic England will shortly be publishing a document on growth in the historic environment which can help illustrate how to accomodate growth successfully	Acknowledge and agree, however important that the IIA indentifies the potential for negative impacts even if these can be mitigated.

Overall	0	General	Environment Agency	The overall approach proposed for the IIA is generally supported. It would be useful to present the final assessment in the same structure as the new London Plan and to make clear how the IIA process has shaped the the policies. There are inter-relationships and synergies between IIA topic areas e.g. water and natural capital, air pollution and health, waste and energy, and between the London Plan's policy areas which are not fully recognised and that require further consideration. This may result in the identification of opportunities for integrated, cross-topic policy approaches and mitigation of environmental impacts. The methodology used for assessing those inter-relationships should be set out in the Scoping Report.	The Scoping Report is based on the baseline data and reflects how the document has evolved. It pre-dates the final structure of the London Plan and It is not practical to restructure the scoping report to reflect this at this stage. The issue of inter-relationships between policy areas is recognised and text has been amended to reflect this.
Overall	2	London Plan	Environment Agency	The London Plan's preparation aligns with that of other new Mayoral strategies e.g. for the Environment, Transport, Housing etc. Consequently, we recommend that the suite of strategies' influence on the proposed objectives, scope of the issues to be assessed, and the approach to be undertaken in assessing them, is clearly identified in the Scoping Report.	Draft strategies such as the MTS and LES were not published at the time of IIA scoping so are not referred to in Appendix B. However, Internal collaboration and consultation processes ensure that the work of preparation of all the Mayor's strategies is conducted in a coordinated way.
Proposed Approach	3.4	IIA Approach	Environment Agency	The Scoping Report should clarify what options the IIA process will appraise to help refine the IIA objectives. It is acknowledged that the spatial options are to be determined, however knowledge of the options is essential to determining the validity of the IIA process	Options appraisal have been clarified are reflected in the IIA report
Proposed Approach	3.5	Spatial and temporal scope of the IIA	Environment Agency	A City for all Londoners' identifies the possibility of accommodating some growth outside of London. The Scoping Report should further develop issues relating to implications from plans, policies and programmes outside London (chapters 4-6 and Appendix B in particular) to better address cumulative and trans-boundary effects	It is not feasible to consider individual Local Plans outside London

Plans & Programmes	4.2	Implications of the Relevant Plans, Programmes and Policies	Environment Agency	This section should refer to other Mayoral plans and strategies, bringing forward emerging key environmental objectives under the topic headings. (e.g. air quality positivity, biodiversity positivity, etc.) Stakeholder feedback from the recent London Environment Strategy IIA Scoping Report consultation should also be included.	Draft strategies such as the MTS and LES were not published at the time of IIA scoping so are not referred to in Appendix B. However, Internal collaboration and consultation processes ensure that the work of preparation of all the Mayor's strategies is conducted in a coordinated way.
Plans & Programmes	4.2.1	Flood Risk	Environment Agency	The 'Flood Risk' objective does not go far enough. We recommend that the objective should include that development contributes to the restoration of the floodplain inside and outside London. This comment impacts upon the content of the other sections on 'Flood Risk', and 'Objectives' elsewhere.	No change - While there are clearly connections to floodplains beyond the GLA's boundaries, and Boroughs are encouraged to consider this as part of cross-boundary issues under the the duty to cooperate, the London Plan has very limited opportunities to influence the restoration of floodplains outside London.
Plans & Programmes	4.2.1	Climate Change	Environment Agency	Under 'Climate change', we welcome the recognition of droughts as a risk to be addressed in designing buildings and spaces. Water supply also adds to London's production of CO2, increasing the imperative to utilise sustainable, localised sources of supply.	Support noted
Baseline	5	Infrastructure	Environment Agency	Necessary infrastructure needs to be planned for, funded and implemented to support growth and development. This includes the Thames Tideway Tunnel, flood risk measures under the Thames Estuary 2100 Plan, potential new Thames Barrier sites and sewer and wastewater infrastructure. This will help define the key sustainability issues, and the opportunities, and will have implications for the assessment of the London Plan's spatial development options.	Amend

Baseline	5.4.10	Health and Health Inequalities	Environment Agency	We suggest the following amendment in bold, 'It is important that the London Plan considers the role and design of the built environment <b>and its integration with the natural environment to ensure that communities have the opportunities...</b> 'etc.	Amend
Baseline	5.15	Climate Change	Environment Agency	'Opportunities' should also include 'Reducing carbon emissions through the integrated delivery and operation of infrastructure'. We welcome the reference on p.108 to making use of Green Infrastructure.	No change - It is not considered that this provides a useful addition
Baseline	5.15.11 - 5.16	Climate Change	Environment Agency	Under 'Climate Change' mitigation and adaptation, and under the two tables addressing 'Implications...' we welcome the reference to drought for the reasons highlighted in our response above. However, the only IIA Objective provided in the tables relates to reducing greenhouse gas emissions. Given the current and anticipated impacts of climate change in London listed in Fig. 5.38 e.g. drought, we would expect to see other objectives related to increasing London's resilience. These may be provided under various topic-related sections, but perhaps should be identified and cross-referenced here.	No change - drought is covered in the next objective and the current level of cross-referencing is considered sufficient
Baseline	5.38 (figure)	Climate Change	Environment Agency	'Sea level rise'. The 'low probability' referred to assumes that investment continues as required, building and maintaining new defences to keep pace with rising sea levels. Low probability is dependent upon delivering the Thames Estuary 2100 Plan and securing the required investment. Please caveat the current statement.	Amend - reference to the TE2100 added under 'flood risk' below the diagram
Baseline	5.8.28	Air Quality	Environment Agency	2nd sentence. Private Transport. We welcome this point in general, but at the end, after '...climate change, <b>and air pollution.</b> '	Amend
Baseline	5.14	Air Quality	Environment Agency	Suggested IIA Objectives. Whilst we welcome the objective provided, we recommend that this be made more specific with targets for improvements and timescale. Could the target be that provided in the 'implications' box above this objective?	Amend - long term target for zero-emission transport added to 'implications'
Baseline	5.16.11	Air Quality	Environment Agency	Table. 'Key Issues', 1st bullet point. We suggest adding after '...London's GHG emissions <b>and air pollution.</b> '	Amend
Baseline	5.42 (figure)	Water Resources and Quality	Environment Agency	Update Figure 5.42 on water bodies' status. Our response to the LES IIA Scoping refers. Further, it should be noted that Fig. 5.42 covers tidal water bodies. There are two of these for London called 'transitional waters'. Para.5.17.6 needs correcting, wherein it should say that groundwater is also covered by the Thames River Basin Management Plan.	Amend

Baseline	5.17	Water Resources and Quality	Environment Agency	Suggest 'Key issues' on p.115 should also refer to sewer, and wastewater treatment capacity. 'Opportunities' should reflect this e.g. increased use of sustainable drainage systems to provide multiple benefits, and reduce the load on existing systems. The Blue Ribbon Network (BRN) us a cross-cutting policy area, We recommend further consideration of the integration of this policy area in the range of IIA topics, and the identification of IIA issues and objectives accordingly. There needs to be recognition that there is a wider water environment, beyond water bodies, that needs to be supported.	Amend
Baseline	5.43 (figure)	Flood Risk	Environment Agency	The IIA uses the RFRA from 2014. the updated Environment Agency Flood Zone data should be used instead	Agreed
Baseline	5.18.4	Flood Risk	Environment Agency	The initial text does not distinguish between fluvial and tidal flooding. The TE2100 Plan addresses tidal flood risks and it is misleading to imply that fluvial risk is also being addressed through TE2100. As per wording suggested in reply to the LES IIA Scoping (to pages 39-40 of that report) it is more appropriate to say that the TE2100 document sets out recommendations for flood risk management for London and Thames Estuary through to the end of the century and beyond. Suggested re-wording might be to substitute 'there are plans... to continue that protection...' etc. to, 'there is an agreed strategy... to maintain and enhance that protection through to the end of the century and beyond, planning for anticipated ongoing climate change and sea level rise and delivering the necessary flood risk management solutions as the impacts arise'. We also question the references to 'low risk', and 'safely' in this paragraph. See comments we made on the LES IIA Scoping,(to p.40, para. 1 of that document), wherein breach modelling indicates that it is not guaranteed that all areas behind the tidal defences are safe for development. In breach scenarios some of places would be vulnerable, as there remains a residual risk of flooding should the defences fail or be overtopped. Suggest re-word. While reference to the TE2100 Plan is welcomed, the need for the London Plan to support its delivery should be included	Amend to clarify tidal/fluvial flooding and to address how risks are discussed

Baseline	5.18.11	Flood Risk	Environment Agency	Opportunities' 3rd bullet, suggest 'improve flood risk' could less ambiguously read ' <b>reduce</b> flood risk'. 'Implications...' Suggest the amended wording in bold,' ...review to ensure that flood risk is <b>reduced and</b> integrated...'. Also the text under 'Implications...' is a central point that should be given a higher profile in the preceding text, by discussing the scope for the integration of water (supply, quality, flood risk management) with other IIA topics, and the capacity for integration to reduce the environmental impacts of growth planned in the new London Plan	Amend [as suggested in relation to flood risk]
Key Issues	6.1 (Figure)	Flood Risk	Environment Agency	column headed, 'Evolution in the absence of the new London Plan'. We suggest , that given the existence of national planning guidance, and local plans etc, it may be more accurate to say that without the new London Plan, the strict criteria it sets out, and the weight it attaches to London's flood management plans delivery and investment, that the number of people / properties at risk will increase.	Amend
Baseline	5.19	Natural Capital	Environment Agency	Reference should be included to the soon to be published DEFRA 25 year Plan which uses a natural capital / ecosystem services approach to integrated decision making, using catchments and landscapes as the building blocks. This should be available in time to inform the IIA Final Report. Please note any additional comments from Natural England regarding a natural capital approach.	The 25 year plan has been delayed
Baseline	5.23	Materials and Waste	Environment Agency	Our LES IIA Scoping comments refer. 'Circularity' does not appear as strongly as it might. We recommend that the initial 'blue box' definitions include a definition of circular economy (as per the LES IIA Scoping Report), and that circular economy be addressed in this and other relevant topic sections (e.g. under Energy, in addressing the potential for energy from waste).	Amend
Key Issues	6.1 (Figure)	Air Quality	Environment Agency	Under 'Key Issues' add ' <b>The health impacts of air pollution include...</b> (and then select relevant statistics provided in Section 5.4).	Amend
IIA Framework	7.3 (Figure)	Infrastructure	Environment Agency	Under Objective 11, 'Infrastructure' we suggest that the need is recognised to deliver potentially significant infrastructure outside London, to support the proposals in the new London Plan e.g. a new Thames Barrier.	The London Plan can reference and be supportive of infrastructure projects outside London but cannot deliver them

IIA Framework	7.3 (Figure)	Air Quality	Environment Agency	Under Objective 14, 'Air Quality' we suggest a link to more specific targets. Our comments under Chapter 3 above refer.	The guide question refers to national and international standards which is considered appropriate
IIA Framework	7.3 (Figure)	Climate Change	Environment Agency	Under Objective 15, 'Climate Change...' we suggest that the following wording in bold to the assessment question: 'Help London to function during a flood event, heavy rainfall, <b>or tidal surge.</b> '	Amend
IIA Framework	7.3 (Figure)	Water Resources and Quality	Environment Agency	Under Objective 18. 'Water resources and quality', we suggest substituting the reference to "water bodies", with ' <b>environment</b> '. The justification is that there is a wider water environment to be supported, not simply water bodies.	Amend
IIA Framework	7.3 (Figure)	Flood Risk	Environment Agency	references to sustainable drainage should be improved. It is recommended that the question be strengthened, perhaps ' <b>integrate sustainable drainage systems?</b> ' Suggest reflect the Mayor's imperative for SuDs in the 'London Sustainable Drainage Action Plan.'	Amend
Appendices	Appendix B	Summary of relevant plans and programmes	Environment Agency	The IIA should identify the available baseline data from areas bounding on the GLA area impacted by the London Plan. This seems under-represented in Appendix B. Where a listed document sets out a key objective / target for environmental performance e.g. AQ neutrality, zero CO2 by 2050 etc., we recommend that these are referenced in Appendix B. Given the advanced stage of the draft London Environment Strategy preparation, we suggest that relevant objectives, which will emerge prior to the finalising of the IIA Report, are read across to the London Plan IIA. We suggest that the water companies' Water Resource Management Plans' are referenced under 'Water resources and quality'. We suggest that the Mayor's 'London Sustainable Drainage Action Plan' 2016 is referenced under 'Flood Risk', and its objectives reflected elsewhere in the Scoping Report.	Partially amend [Sustainable Drainage Action Plan and water companies management plans are referenced in Appendix B]

Overall	0	Engagement	Just Space	The Mayor should ensure that all consultation exercises are fair and take place when proposals are still at a formative stage. Public consultation on the IIA report should occur in advance of the London Plan draft publication	The Scoping Report is only required to consult the Statutory Consultees (English Heritage, Natural England and Environment Agency) however the GLA did significantly broaden the range of stakeholders it consulted with during the scoping stage.
Proposed Approach	3.4.6	Stage B	Just Space	The consultation should set out the significant positives and negatives of the options and give the opportunity to assess the alternative options (including those which have been discarded). The current proposed approach relies on internal/focused consultation rather than wider public consultation to refine and develop the options which is not sufficiently transparent and limits the ability for the public to influence the process	The Outer London Commission and A City for all Londoners consultations (all of which had wide public consultation) have fed into the development of the options. The IIA Report itself allows for further public consultation on the alternative options.

The London Plan	2.2.5	Spatial Development Options	Just Space	<p>The distinction between the proposed 3 options is not clearly set out. Broad proposals under point 2 'estate renewal' should be explained in more detail to make clear the form this is intended to take. Current practices in estate renewal result in net losses of social housing and have substantial environmental and social costs. It is considered essential that the London Plan and the IIA together represent an objective evaluation of doing or not doing estate renewal, especially that which involves demolition/eviction. Proposals relating to more dispersed growth across London are broadly supported. More growth of jobs and services where people live should reduce the need to travel and help to build lifetime neighbourhoods, and should help to foster London's existing diverse economic activity. This should be spelled out and explored more carefully. It will be methodologically difficult to explore this option - of fostering dispersed activity - within the same package (Option 2) as relocation of industry within or beyond Greater London because the activity-locations being extinguished in the process are precisely those which could most usefully be conserved and encouraged. It is suggested that this element (relocation/consolidation) should be split out and evaluated as part of a separate option. See below on option 4.</p>	The IIA Report clarifies the alternative options and sets out in detail what comprises each option.
Overall	0	Proposal for a Community Generated Option	Just Space	<p>Just Space proposes that a community-generated alternative option be an integral part of the process and advances its publication, 'Towards a Community Led Plan for London' as a basis for this. Appendix 1 sets out 10 Key points from this publication which can be adapted for the issues, guiding questions, objectives and the development of alternatives.</p>	The refinement of the alternative options take into account the suggestions.
Proposed Approach	3	Engagement	Just Space	<p>The IIA Scoping Report's objectives and guiding questions have been reviewed by Just Space in relation to the Workshops of the GLA 'A City For All Londoners' stakeholder engagement programme to see if the points raised in the sessions have been adequately considered by the IIA SR. In many instances, workshop points raised have not been addressed.</p>	The City for All Londoners covered early engagement for all of the Mayoral Strategies. Many of the points raised as part of that consultation would not all be appropriate for the London Plan. The objectives and guide questions reflect key issues specific to the London Plan.

Proposed Approach	3	Implications of the Relevant Plans, Programmes and Policies	Just Space	While the scoping report claims the IIA process and London Plan is intended to be integrated and incorporate the statutory requirements of SEA, SA and Public Sector Equality Duty. Confidence in this is reduced by the failure of section 3.4.1's list of key legislation to include the GLA Acts which, among several duties, require the preparation of a health inequalities strategy /promoting reduction of health inequalities.	Amend
IIA Framework	7	IIA objectives	Just Space	Many of the objectives and guiding questions for each topic do not address each of these stated components of the process (such as equalities or health) notwithstanding an attempt at this to colour code guiding questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be effective, all of the stated components of assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised.	The IIA framework does reflect the requirements of the an EqIA. There are 2 specific objectives relating to equalities as well as a number of guide questions under every objective related to equalities.
Appendices	Appendix D	IIA objectives	Just Space	Appendix D attempts to test the compatibility of the IIA objectives, however there are inter-dependencies or synergies which are not explored because of the compartmentalised nature of the objectives and guiding questions. The matrix is a very simplistic matrix and there is no indication of degrees of significance and the remedies necessary which would require the original objectives to be amended.	The objective compatibility matrix is intended to provide an indication of potential conflicts or synergies to help guide the framework.
Proposed Approach	3.1.1	IIA Process	Just Space	the iterative actions that good plan-making should incorporate in order to achieve sustainable development are not adequately assured by the approach set out in the Scoping Report. Stage D should say much more than simply identifying the action of reporting to the Mayor 'recommendations for potential changes (if any)'. This is far too vague, weak and non-committal. To be genuinely iterative, the process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. It is not clear to what degree the IIA will be open to critical scrutiny as the London Plan progresses	The IIA report is consulted upon at the same time as the draft London Plan and is therefore open to the same critical scrutiny and will be discussed at the EiP if appropriate.
IIA Framework	7.5	Monitoring	Just Space	Monitoring of implementation is rated highly in importance by Just Space and, therefore, section 7.5 warrants consideration. Unfortunately, in this report the monitoring proposals are thinly developed and section 7.5.6's promise of 'a full list of suggested indicators presented in Appendix G' could not be found.	The monitoring framework will be developed after the Examination in Public as per the IIA requirements.

Overall	0	Methodology	Just Space	To provide interaction with community groups/ other stakeholders and real life data, we propose the use of Just Map. This will provide a more open methodology, based on participation.	Noted
Proposed Approach	3	IIA Process	Just Space	The Scoping Report refers to a separate Health Impact Assessment, and Equalities assessment. currently there is no public knowledge of a consultation on these reports. These should be made available, if only to demonstrate how they have informed this IIA Scoping Report for the London Plan as the overarching spatial development strategy.	As per the introduction, para 1.1.4, the Health Impacts Assessment is incorporated as part of the Integrated Impact Assessment and is not a separate report.
Plans & Programmes	4	Health and Health Inequalities	Just Space	The NHS Healthy Urban Design Unit (HUDU) checklist referred to in A4.4 has been devised primarily for impact assessing planning applications rather than for plan-making. It therefore, needs careful adaption and would hugely benefit from a coproduction approach with communities to achieve a rigorous framework for appraising and evaluating at the strategic level.	The HUDU checklist was not directly copied but informed the approach to HIA elements on the IIA.
Overall	0	General	Just Space	The IIA Scoping Report gives an insight into the perceived issues and likely strategies for London but does not provide adequate analysis and is insufficiently detailed to capture the complexities and specific issues/needs of diverse groups. Given that the IIA framework is consistent for all Mayoral strategies and includes common objectives to be used for the assessment stage of the IIAs for each strategy, it is critical to get this correct. An inadequate focus on the socially and spatially differentiated health needs of all Londoners results in limited and damaging health outcomes. To become more valuable, the IIA Scoping Report should ask about those issues and groups that need to be included within the strategies that are not yet recognised. There is a need for a greater acknowledgment of the central relevance of health across the IIA.	Both equalities and health issues are addressed within the specific objectives under the framework as well as forming guide questions under each of the 24 objectives.