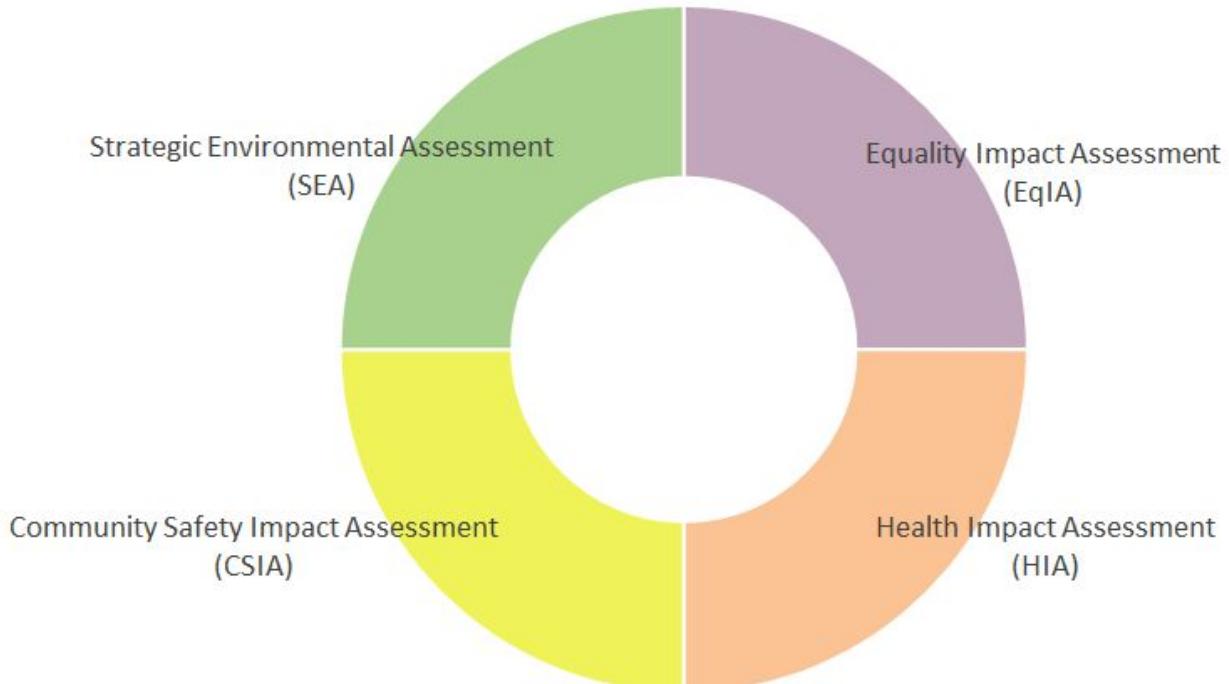


# London Plan Integrated Impact Assessment

The IIA Report provides an assessment of the London Plan based on three pillars:  
**environmental, economic and social information.**

The IIA was developed by Arup following the guidelines under the GLA's Scoping Report (Feb, 2017). It was published on November 2017 and open for public consultation until March 2nd.

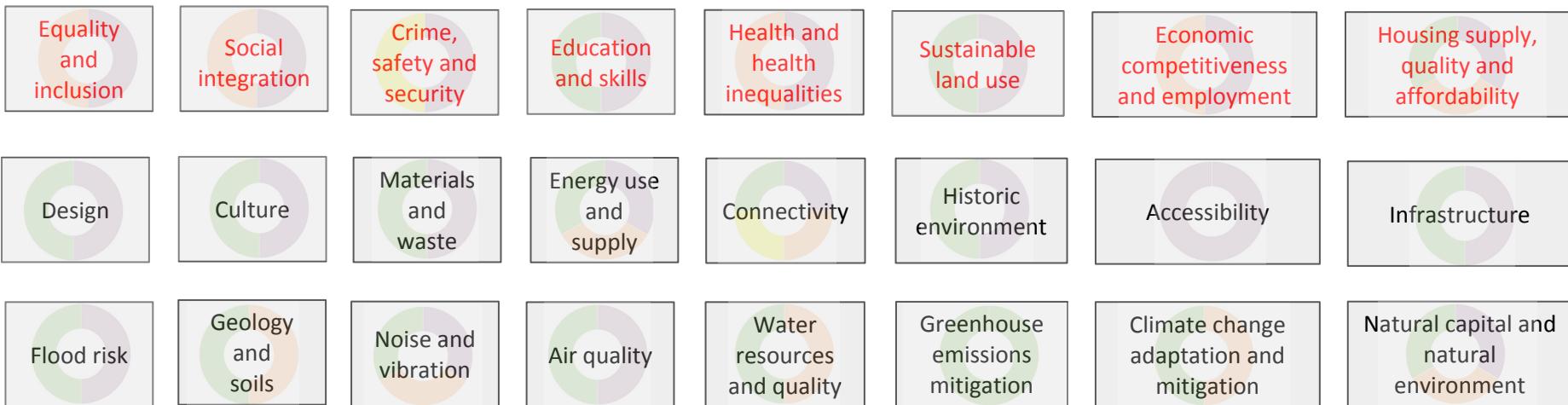


## Main guidelines

- The GLA defined and incorporated five main statutory requirements according to which the London Plan should be reviewed.
- Arup used four of them (excluding Habitats Regulation Assessment, HRA) to assess it and applied them to produce the Integrated Impact Assessment (IIA).

# The 24 Objectives of the IIA scoping report

- GLA, within the IIA scoping report of February 2017, included a set of topics identified in the London Plan and accompanied them with relevant objectives.
- Arup raised questions related to the four main requirements.
- **Highlighted** are the topics that directly benefit the society however all of them should include it as priority in their objectives.
- The last row is addressing environmental issues that will be considered in the London Plan



# Identifying “*likely significant effects*”: objectives tested against statutory requirements. Outcome effects represented by color code.

++ Significant positive

+ Minor positive

o Neutral

- Minor negative

-- Significant negative

? Unknown

n/a Not applicable

T Temporal

P Permanent

I Indirect

D Direct

L Local, GL Greater London

W Wider

Effects analyzed from various perspectives:

- Physical extension: London or wider intervention;
- Quantity of people affected; and
- Timing on policy implementation.

- Outcome presented as a compiled result, hence loss of information on multiple effects;
- No distinction on policy impact over different groups: age, gender, minority groups;
- Simplistic review, avoidance on identifying possible failures or inviability;
- *? Unknown (not enough information provided) and N/A (not applicable) are used as jokers to be safe on critics.*

# How to read the charts

Refer to LP IIA SR p.174

++ Significant positive

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

+

Minor positive

o

Neutral

-

Minor negative

--

Significant negative

?

Unknown

n/a

Not applicable

T

Temporal

P

Permanent

T/P

I

Indirect

D

Direct

I/D

L

Local

GL

Greater London

W

Wider

L/GL  
/W

# IIA Process - Stages

## Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.
- A2: Collecting baseline information.
- A3: Identifying environmental issues and problems.
- A4: Developing the IIA framework (objectives).
- A5: Consulting on the scope of the IIA.

## Stage B: Developing and Refining Options and Assessing Effects

- B1: Testing the plan objectives against the IIA framework.
- B2: Developing the plan options.
- B3: Predicting the effects of the plan.
- B4: Evaluating the effects of the plan.
- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
- B6: Proposing measures to monitor the significant effects of implementation.

## Stage C: Preparing the IIA Report

- C1: Preparing the IIA Report.

## Stage D: Examination

- D1: Consulting on the draft plan and the IIA Report.
- D2: Assessing significant changes.
- D3: Decision-making and providing information.

## Stage E: Monitoring

- E1: Finalising aims and methods for monitoring.
- E2: Responding to adverse effects.

Refer to LP IIA SR p.13-15

# Opportunities for community integration

## Stage A:

Setting the context, Scoping Report, developing IIA framework

## Stage B:

Testing and evaluating LP against IIA.

**Development of options on strategic policies were NOT opened for public consultation.**

## Stage C:

Preparing the IIA Report. Integration of assessments.

## Stage D:

Public consultation

**Inspector reports on recommendations adopted/rejected by Mayor.  
Report should be available for public consultation.**

LP goes to SoS for 6 weeks

London Assembly for 21 days. .

## Stage E:

London Assembly approves LP, is published with formal status.

Post-Adoption Statement by Mayor.

Monitoring starts.

**How community will participate on monitoring?**

## Chapter 4. Policy H10. Redeveloping existing housing and estate regeneration - IIA Review

Description	Appraisal	Cumulative	Recommendations	GLA response
<p>. Support of the increase of density for the cause of the future housing needs and emphasis on the affordable housing and its replacement in case of loss with equivalent or better quality.</p>	<p><b>Social</b></p> <ul style="list-style-type: none"> <li>. Support the needs of low income communities, increase their participation in the regeneration schemes.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>. Benefit from high density through the increase of the city's competitiveness.</li> </ul> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>. Sustainable use of land, mitigation of the negative impacts of high density development.</li> </ul>	<p><b>Complementary</b> to G4 (Local green and open spaces), S1 (Improving air quality), SD10 (Strategic and local regeneration).</p> <p><b>Conflictive</b> to H17 (Large scale purpose built shared living), H18 (Growth Areas in Wider South East and Beyond).</p>	<p>. Arup suggest the London Plan should provide <b>more information</b> on the housing accessibility as well as the social, economic and environmental improvements related to the higher density</p> <p>. Development, including the impacts on the townscape.</p>	<p><b>. The further details requested from Arup are included in other sections of the London Plan.</b></p> <p><b>. The text was enhanced with clarifications.</b></p>

## Policy H10. Comments:

- **No specific information on the process of the residents' allocation is addressed.** The policy's impact is assessed using the Equality Impact Assessment as significant positive in terms of social integration.
- **No further details** in the type of housing and tenure of the displaced population of the redevelopment project despite the fact that objective 5 (Housing supply, quality, choice and affordability) is assessed as significant positive and major significant positive in long term goals.
- The IIA is **leaving gaps in the consideration of the Community Safety Impact** in the assessment of the policy using the grey colored box, a coding missing from the document.
- Previous regeneration examples **render the LP unreliable** in terms of maintaining the affordability levels and capacity, fact that is not considered in the IIA.
- **Arup question the amount of information provided by the LP** on density increase, requesting more information on the ways regeneration will improve the area socially, economically and environmentally.

### Policy H10 Redevelopment of existing housing and estate regeneration

- A Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. This includes the loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.
- B Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision. All such schemes are required to follow the Viability Tested Route (see [Policy H6 Threshold approach to applications](#)).
- C For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability Tested Route (see [Policy H6 Threshold approach to applications](#)).

# Policy H10. Chart

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

++ + 0 - -- ? n/a

## Objectives

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

## Chapter 11. Policy DF1. Delivery of the plan and planning obligations - IIA Review

Description	Appraisal	Cumulative	Recommendations	GLA response
<ul style="list-style-type: none"> <li><b>Planning obligations</b> strengthen (by applicants).</li> <li><b>Viability assessment</b> (VA) only undertaken on specific basis if <b>identified clear barriers to deliver</b>; applicant shall present robust evidence when requesting VA.</li> <li>This information should be taken in line, for analysis, with Mayor's AH and Viability SPG.</li> </ul>	<ul style="list-style-type: none"> <li>Standardisation of <b>planning process, provides certainty</b>, and negotiating power for stakeholders and community.</li> <li><b>Public transport and housing</b> as key for development.</li> <li>Positive on <b>VA</b> on site-specific: to optimise brownfield land, to <b>speed up planning process</b> without barriers.</li> </ul>	<ul style="list-style-type: none"> <li><b>Policy facilitate housing delivery, transport</b> and viability testing.</li> <li><b>Social infrastructure?</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Minor wording</b> modification</li> <li>Reference the role of <b>density</b> when bringing forward <b>brownfield sites</b>, and the <b>impact on viability</b>.</li> </ul>	<ul style="list-style-type: none"> <li><b>Complete confidence on viability of policies</b> within the plan as shown on viability study.</li> <li><b>Viability studies, should be the exception.</b></li> </ul>

## Policy DF1. Comments

- **IIA doesn't address the funding gap and capacity of delivery of the LP**, mainly focuses on the benefits of planning standardisation. "Benefits" that may be not for the community.
- **Viability assessment** for specific cases is reinforced by the IIA, seen as an opportunity to speed up planning process. Challenging viability is hence understood as a barrier for development.
- **GLA highlights full confidence on overall LP viability** - IIA slightly questioned viability on brownfield areas.
- **Social infrastructure** is not recognized by IIA/LP as key on development, hence requiring funding. Transport and housing receive full support on funding and planning.
- Further denial on social infrastructure importance as objectives 1(reducing inequality), 7 (mix - used neighborhoods) are marked as N/A.
- Objective 11 (ensure social infrastructure) is marked as + positive, when no funding is allocated to it. How can be positive, if not viable?

### Policy DF1 Delivery of the Plan and Planning Obligations

- A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.
- B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.
- C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.
- D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:
  - 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and
  - 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.
- E Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

# Policy DF1. Chart

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

++ + 0 - -- ? n/a

## Objectives

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- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
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- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.