

MAYOR OF LONDON

# Draft London Plan Alterations

## Crossrail Funding - Integrated Impact Assessment

Published for public consultation

May 2009

**The London Plan**  
**(consolidated with amendments since 2004)**  
Spatial Development Strategy for Greater London

## **Greater London Authority May 2009**

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In accordance with the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, an Integrated Impact Assessment must be published with the draft alterations to the London Plan.

Entec was commissioned by the Greater London Authority to undertake an independent Integrated Impact Assessment as an iterative process during the development of the Draft London Plan Alterations on Crossrail. This document constitutes the Integrated Impact Assessment, and therefore represents the views of Entec and not necessarily those of the Greater London Authority or the Mayor of London.

# Greater London Authority

## Proposed Alteration to the London Plan: Crossrail Funding - Integrated Impact Assessment

Integrated Impact Assessment Report

May 2009



# LONDON

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## Greater London Authority

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Entec UK Limited

# LONDON



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## Non-technical Summary

The Greater London Authority (GLA) is proposing a set of policy alterations to the Spatial Development Strategy for London (known as the London Plan). These changes, referred to as the *Crossrail Alterations*, will allow the GLA to use planning obligations to secure funding for the major cross London transport infrastructure project, known as Crossrail. The *Crossrail Alterations* to the London Plan use existing planning obligations (commonly called Section 106 agreements) and the proposed Community Infrastructure Levy (CIL), which is currently passing through parliament.

This report presents the findings of an Integrated Impact Assessment (IIA) which is an assessment of the environmental, social and economic performances of the policy alterations against a set of sustainability objectives. This IIA considers health, well-being and equality of opportunity issues in addition to environmental issues. The approach fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and helps to ensure that all possible effects are captured by the assessment.

The proposed changes to the London Plan are the inclusion of two new policies and the alteration of a further two policies:

- **3C.12A - Funding of Crossrail:** This new policy sets out how certain development will be required to contribute towards the funding of Crossrail through planning obligations.
- **6A.4 - Priorities in planning obligations:** This policy has, with Policy 6A.5, had a minor amendment to include the funding of Crossrail.
- **6A.5 - Planning obligations:** The wording of this policy has been amended to include some of Policy 6A.4 and some minor alterations have been made to the text including the strengthened emphasis on the boroughs to set out a clear framework for negotiating planning obligations.
- **6A.5A - Community Infrastructure Levy:** This new policy provides a framework for the application of the CIL once the details have been agreed. Emphasis is placed on the use of CIL to fund public transport, particularly Crossrail.

The changes to the London Plan are supported by a Supplementary Planning Guidance (SPG) document. In line with government policy an appraisal of the SPG has not been undertaken. However, the *Crossrail Alterations* and the SPG are closely linked and therefore a commentary on the sustainability issues relating to the SPG has been identified.

The key aim of the proposed *Crossrail Alteration* is to secure £600 million of the £15 billion pounds required for the completion of the project from development that would benefit from the scheme upon its completion. Without the proposed *Crossrail Alteration* it is anticipated that funds would need to be collected through an increase in fares or further Government subsidies, this represents the ‘business as usual’ alternative.

The preferred option, that of an alteration to the London Plan to include the new and amended policies was subject to an IIA. This option was developed drawing on an evidence base which included a technical report investigating overcrowding on London’s rail network and a feasibility study into the use

of developer contributions. These two reports looked at a number of alternatives which are identified and discussed within the IIA Report.

In undertaking the appraisal of the preferred option a number of uncertainties and technical difficulties were encountered (including how the CIL will be implemented; the effects of the current economic climate and how the implementation of a tariff will affect development and other aspects which currently benefit from Section 106 money).

The overall findings of the IIA of the *Crossrail Alterations* were that none of the new or altered policies were considered to have any significant positive or negative effects against the IIA objectives which they were assessed against.

The main concerns identified in the assessment were that there was the potential for a diversion of funds towards Crossrail from areas which typically receive funding. Developer Contributions (Section 106 funding) provides funding for a range of areas and is a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. Should funds be diverted towards Crossrail these areas may as a result of receiving less funding be affected. However, there is a high degree of uncertainty related to this assumption. S.106 agreements are made through negotiation, discussion and agreement between the developer and the Council on a case by case basis. This uncertainty was assumed to be more apparent in the short term, but as the market adjusts to the new tariff it is anticipated that there would be more certainty and less of an effect against the IIA objectives.

Concerns were also raised that in light of the current economic climate the additional funds required for Crossrail may tip the balance and make some development proposals economically unfeasible. This has the potential to result in significant negative effects, for example, if a major regeneration scheme was delayed or not taken forward. The viability report which was part of the evidence base for the development of the policies states that *'all things considered, a low simple tariff .... should not materially deter development provided that it is signalled in advance and can be factored in as one of the cost of production'*. Furthermore, to avoid or reduce the risk that developments will not proceed where the contributions are prohibitively expensive each case will be considered on its merits and factors like the viability of a scheme will be taken into account when decisions about contributions are made. This was helpfully clarified following consultation with the London Assembly and the GLA Group Functional Bodies by adding reference in Policy 3C.12A to the *'economic viability of the development concerned'* and *'impacts of different types of development in particular locations'*.

It was also considered possible that the tariffs charged on office space (under the SPG) may potentially result in changes to the amounts of office space being proposed in Central London. This could manifest through either smaller developments falling below the trigger threshold or by developers looking to build office and mixed use developments outside of the central area. However, this situation is less likely to happen if the charge is low, predictable and signalled well in advance.

The IIA report concludes that given the level of uncertainty associated with the implementation of the proposed *Crossrail Alterations* to the London Plan careful monitoring of the effects of the changes will need to be undertaken in order to ensure that the identified uncertainties do not manifest as negative effects.

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## **Introduction Background**

Entec UK Ltd has been appointed to undertake an **Integrated Impact Assessment (IIA)** for a set of policy alterations to the Spatial Development Strategy for London (known as the London Plan). The Greater London Authority (GLA) is responsible for preparing and reviewing the London Plan which provides the statutory planning framework to guide London's development into the future. The policy alterations to the London Plan will focus on the use of **planning obligations** (commonly called Section 106 agreements) in line with Circular 5/05 (ODPM, 2005), the alteration also includes the potential of the **Community Infrastructure Levy (CIL)** to generate developer contributions to fund infrastructure, in particular the Crossrail 1 project (hereafter referred to as Crossrail).

This IIA Report presents an assessment of the environmental, social and economic performance of the alterations against a set of sustainability objectives. This report follows consultation on a Scoping Report (GLA, 2008)<sup>1</sup> which set out the proposed approach to the IIA. A workshop was held during the consultation period (8<sup>th</sup> January 2009) to provide consultees with additional information on the scope of the IIA. Comments received during the workshop and following the end of the consultation period were considered in revising the approach to the IIA (see Appendix D).

This IIA considers health, well-being and equality of opportunity issues. The approach fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and helps to ensure that all possible effects are captured by the assessment. This approach also avoids the need to undertake separate assessments, although for consistency with the assessments of the consolidated London Plan a separate Equalities Impact Assessment has been undertaken and the results of which have been incorporated into this report.

## **The Requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

An SA (incorporating SEA) of the London Plan is required by the Government Office for London Circular 1/2008, which states (in Section 3.6) that:

*'The sustainability appraisal, incorporating SEA, of the SDS should allow for a systematic and iterative testing of the emerging proposals.'*

and:

*'The precise form of the appraisal is a matter for the Mayor. However, he or she should have regard to current Government guidance on good practice for sustainability appraisals, for example in PPS11, PPS12, any revisions to these and Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM 2005).'*

The Circular also states that:

*'The approach to these assessments [SEA, SA and HRA] should take account of relevant guidance. Assessment[s] should be proportionate, taking into account the scale and extent of the alterations or review proposed. It should build on previous assessments that have been undertaken.'*

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<sup>1</sup> GLA (2008) London Plan Crossrail Alterations: IIA – Scoping Report (10<sup>th</sup> December 2008 to the 21<sup>st</sup> January 2009), prepared by Entec UK Ltd.

Whilst the requirements to produce an SA and SEA are distinct, Government guidance<sup>2</sup> considers that it is possible to satisfy the two requirements through a single integrated approach, and it is this approach which has been undertaken for the ‘*early alterations*’ to the London Plan addressing housing, waste and minerals in 2005/2006 and the ‘*further alterations*’ published in October 2007. For consistency, this approach has been undertaken for the proposed alterations. These alterations are known as the ‘*Crossrail funding alterations*’ to distinguish them from previous alterations. It should be noted that an assessment under the SEA Directive is **not required** for ‘*a financial or budget plan or programme*’; however, as these changes are embedded in a spatial plan and as such one is being undertaken to reflect good practice and for consistency with the previous sets of alterations.

## **Purpose of this IIA Report**

The purpose of this IIA Report is to summarise the development of the alterations, including the reasonable alternatives, and to present the findings of the assessment of the draft alterations against a range of social, economic and environmental objectives. Where any significant adverse effects are identified, mitigating measures have been proposed, along with an indicative monitoring framework.

In consequence, this report aims to:

- Provide information on the proposed Crossrail Funding Alterations (Section 2);
- Provide a summary of relevant environmental contextual information drawing on a review of relevant plans and programmes (Section 3.3), baseline information (Section 3.4) and consultees views (Appendix D);
- Outline the process of assessment (Section 3), the results of the scoping stage consultation (Appendix D) and any difficulties encountered during the completion of the assessment (Section 3.6);
- Identify, describe and evaluate the likely significant effects of the alterations (Section 3.6) and its reasonable alternatives (Section 2.4);
- Provide potential measures to avoid, reduce, mitigate or offset any potentially significant adverse effects on the environment and, where appropriate, to suggest potential measures to enhance the contribution of the alterations to the achievement of sustainability objectives (Section 3.6); and
- Provide an opportunity for the consultation authorities and the public to offer views on the findings of the assessment of the alterations (Section 1.3).

In considering the contents of this IIA Report, consultees are asked to consider, in particular, the key questions set out in **Section 1.3**. However, any other comments would also be gratefully received.

## **Consultation**

Consultation is a key aspect of the IIA process, which seeks to ensure that key stakeholders, potentially affected parties and the wider public have an opportunity to present their views on the emerging alterations prior to

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<sup>2</sup> ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

adoption. As such consultation will be undertaken on this document for three months from the 18 May 2009. The box below details the consultation period and some key consultation questions and details of how to respond.

We would welcome your views on this IIA Report. The consultation period will run for three months from Monday 18 May 2009. We are particularly interested to receive your views on the following:

- 1. Do you agree with the assessment of the preferred option?** These are set out in Section 3 with detailed matrixes in Section 3.6. We are interested to receive your views on whether you agree with the effects identified.
- 2. Do you agree with the conclusions and recommendations of the IIA Report?** These are set out in Section 4. We are interested to hear your opinion on the recommendations of the report, taking into account the findings of the assessment and information presented elsewhere.

Please provide comments by Monday 10 August 2009.

Comments should be sent to:

**Post: Boris Johnson**

Mayor of London  
(Proposed Crossrail Alteration)  
GLA, City Hall  
The Queen's Walk  
London SE1 2AA

Or via email to [mayor@london.gov.uk](mailto:mayor@london.gov.uk) with 'Proposed Crossrail Alteration' in the subject box.

The consultation on the proposed methodology presented within the *Scoping Report* (GLA, 2008) was undertaken for 6 weeks between the 10<sup>th</sup> December 2008 and the 21<sup>st</sup> January 2009. Responses were received from the Environment Agency, English Heritage, Natural England and the Government Office for London (GOL). Comments were also received during the workshop held in January 2009. A summary of the feedback received, and how it has been considered is set out within Appendix D.

## Overview of the Proposed Alterations The London Plan Review

The first London Plan was published by the Mayor in February 2004<sup>3</sup>. 'Early Alterations' to the London Plan addressing housing, waste and minerals issues were published in December 2006<sup>4</sup>. The Mayor has also prepared 'Further Alterations' to the London Plan, which were published in October 2007<sup>5</sup>. The Mayor incorporated both the *early* and *further* alterations in the London Plan

<sup>3</sup> GLA (2004) *The London Plan Spatial Development Strategy for Greater London* (available online at [www.london.gov.uk/mayor/strategies/sds/london\\_plan/lon\\_plan\\_all.pdf](http://www.london.gov.uk/mayor/strategies/sds/london_plan/lon_plan_all.pdf))

<sup>4</sup> [www.london.gov.uk/mayor/strategies/sds/lon\\_plan\\_changes/index.jsp](http://www.london.gov.uk/mayor/strategies/sds/lon_plan_changes/index.jsp)

<sup>5</sup> [www.london.gov.uk/mayor/strategies/sds/eip-report07/index.jsp](http://www.london.gov.uk/mayor/strategies/sds/eip-report07/index.jsp)



published in February 2008<sup>6</sup>. Sustainability Appraisal has been undertaken on the original London Plan<sup>7</sup> and the *early* and *further* alterations.

Additional policy alterations are now being proposed, which will focus on the use of Section 106 (S.106) agreements, together with the potential of the community infrastructure levy to generate developer contributions to fund infrastructure projects. Alongside these alterations to the current plan, the Mayor is also planning to undertake a full-scale review of the London Plan with a move towards a new replacement London Plan and a series of SPG documents. These additional alterations are known as the '*Crossrail Funding Alterations*'.

## **The London Plan Crossrail Funding Alterations**

The alterations will secure funding and generate developer contributions to fund the Crossrail project. The main focus of these alterations is on the use of Section 106. The potential policy alterations helping to achieve the funding of this project are outlined in the following sections.

## **Planning Obligations (“Section 106 agreements”)**

One new policy which sets the framework for the use of planning obligations to raise contributions towards the funding of Crossrail will be added. In addition the priorities in planning obligations will be made clearer through the amendment of two other policies. These policies are listed below:

- **3C.12A - Funding of Crossrail:** This new policy has been added to Chapter 3 of the London Plan (*connecting London – improving travel in London*) and sets out how certain development will be required to contribute towards the funding of Crossrail through planning obligations. The policy states that the Mayor will provide guidance for the boroughs and other partners on negotiating planning obligations with developers. It also includes the target of £600m which is to be raised for Crossrail through planning obligations though includes for the economic viability of each development to be considered.
- **6A.4 - Priorities in planning obligations:** This policy has, with Policy 6A.5, had a minor amendment to include the funding of Crossrail, where appropriate, within the category of ‘highest importance’ along with affordable housing and other public transport improvements. The changes also prioritise Crossrail above other public transport improvements.
- **6A.5 - Planning obligations:** The wording of this policy has been amended to include some of Policy 6A.4 and some minor alterations have been made to the text including the strengthened emphasis on the boroughs to set out a clear framework for negotiating planning obligations.

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<sup>6</sup> GLA (2008) *The London Plan Spatial Development Strategy for Greater London Consolidated with Alterations since 2004* (available online at [www.london.gov.uk/thelondonplan/docs/londonplan08.pdf](http://www.london.gov.uk/thelondonplan/docs/londonplan08.pdf))

<sup>7</sup> GLA (2004) *Sustainability Appraisal of the London Plan* (available online at [www.london.gov.uk/mayor/strategies/sds/sustainability.jsp](http://www.london.gov.uk/mayor/strategies/sds/sustainability.jsp)).

## **Community Infrastructure Levy**

The Government has announced that it intends to introduce a Community Infrastructure Levy (CIL). It is proposed that this will be a standard charge decided by designated charging authorities and levied by them on new development; it is intended to raise resources to help fund delivery of infrastructure from the private sector, which benefits from it. The Planning Act 2008 contains powers for ministers to implement the CIL by regulation, and these are expected to be drafted and put in place later this year.

Although the details of the new system – and how it would be implemented in London given the Capital’s unique circumstances and institutional arrangements for planning – are still being developed, it is likely that the CIL will operate as follows:

- The 2008 Act sets out which authorities will be empowered to raise the CIL (“charging authorities”). These include the Mayor and the London boroughs.
- Each charging authority will identify and cost the infrastructure needed to support the development of their area. It is likely that there will be a list of the kinds of infrastructure that may be funded through the CIL; the Government has made clear that ‘things usually thought of as infrastructure – such as transport and flood defences’ will be covered by the definition.
- Charging authorities will then prepare a ‘charging schedule’ setting out the rate and/or the formula determining how the CIL will be calculated in their area.
- These charging schedules will be tested through an examination in public.
- The amount of CIL to be paid by a development will be calculated at the time planning consent is granted, and will be payable at the time when development starts. Failure to pay could result in a legal requirement to stop development.

The Government is considering whether there is a case to restrict the use of planning obligations following the introduction of the CIL. While use of the CIL by authorities will not be mandatory, one option under consideration is that contributions towards strategic infrastructure currently collected by means of the kind of standard charge and formula approach outlined in this document should be collected solely through CIL by restricting the scope of planning obligations. Other options include reducing the scope of planning obligations through a narrower set of criteria than those currently set out in Circular 5/05. The Government has also indicated that it will be considering how authorities should move from one system to the other, and the consequences this will have for development – in particular for areas with tariff type policies which may need revision. They have stated their belief that existing tariff schemes should, over time, be migrated to CIL, but they are also considering how best to phase any reduction in scope to minimise transitional issues and over what timescale that reduction should take place.

The Government has stated that the London Plan should incorporate the spatial elements of transport, economic development, environmental and other strategic policies for London, adopting an integrated approach embracing all aspects of physical planning, infrastructure development and other policies affecting or affected by the distribution of activities. To further this role, the Government proposes that the Mayor should have the power to set a CIL charge to deliver key infrastructure needed to support implementation of the London Plan.

The details of the CIL regime and of how it will be applied in London are still being developed. As the details of the new system emerge, the Mayor will work with boroughs and other partners to develop an effective and cooperative framework for application of the CIL, particularly to ensure it is applied both to support the policies set out in the London Plan and more local priorities. It is likely that this will include arrangements for moving from the approach outlined in this document with regard to planning obligations to the CIL.

One policy has been added to facilitate the use of CIL to contribute to Crossrail.

- **6A.5A - Community Infrastructure Levy:** This new policy provides a framework for the application of the CIL once the details have been agreed. Emphasis is placed on the use of CIL to fund public transport, particularly Crossrail.

### **Supplementary Planning Guidance**

Supplementary Planning Guidance (SPG) has been produced to provide more detailed advice on the policy alterations. The draft SPG will be subject to public consultation alongside the proposed policy alterations from the 18<sup>th</sup> May 2009. The policy alterations and the SPG will continue to be refined following consultation in light of comments received and central Government policy, for example, on Community Infrastructure Levy. The SPG sets out the following:

- Background & policy context for Crossrail;
- Funding arrangements for Crossrail;
- Details of the standard charges that will be applied – including where they will be applied and in which circumstances (**Box 2.1** outlines how the costs presented in the SPG were arrived at); and
- Background information to the CIL (the details of which are currently being progressed through Parliament).

The SPG deals with use of planning obligations to secure contributions towards the funding of Crossrail (identified as a purpose for obligations in Policy 6A.4 of the highest importance), however, it is likely that further, more general guidance on use of planning obligations will also be brought forward by the Mayor in due course.

The SPG details the spatial application of the policies; the key areas targeted by the policy are outlined in **Box 2.2**. These areas are those where public transport overcrowding is greatest in the peak hours. The two key areas which this refers to are the Central Activity Zone (CAZ) and the Isle of Dogs. In addition the SPG makes allowances for the application of the policies outside of these central areas where the purpose, location and criteria make it appropriate to do so.

## Box 2.1 Crossrail contributions: formulae and standard charges

The Crossrail contributions which are outlined in the SPG have been developed to capture £200m in developer contributions. The rationale for the geographical scope and level of the contributions presented in the SPG is based on two key studies for Transport for London (TfL). These are:

- TfL (2008) *Crossrail Section 106 Contributions Report* (2008) prepared by Colin Buchanan, and
- TfL (2008) *Crossrail: Development and Funding Contributions* (2008) prepared by Jones Lang LaSalle.

The Colin Buchanan report examines the impact of development in London on the rail network (in terms of crowding) and seeks to identify the key contributors to this by development type. The work concludes that the greatest contributors to crowding on the network (especially during the morning peak - the busiest period) are office developments within the Central Activity Zone (as defined in Map 5G.1 of the London Plan) and within the Isle of Dogs (these combined areas are referred to as the Central Zone). To a lesser degree the report found that retail developments in the Central Zone also contribute to crowding (but less so during the morning peak hours).

The report prepared by Jones Lang LaSalle took the crowding data developed in the Colin Buchanan report and looked at a number of scenarios for a range of development types and areas. These include

- Offices only within the Central Zone;
- Offices, retail and hotel only within the Central Zone;
- Offices, retail, hotels and residential within the Central Zone;
- Central and Outer London Zones offices only; and
- Central and Outer London Zones offices, retail and hotel only.

In addition two scenarios with a higher charge for the Isle of Dogs were considered:

- Central Zone offices only with a 25% higher rate for the Isle of Dogs; and
- Central Zone offices only with at £323 psm/ £30psf in the Isle of Dogs.

These scenarios were tested and Jones Lang LaSalle's preferred solution was offices **only within the Central Zone** which are charged against the net increase on office space over previous space, costs are incurred from the date of planning permission being granted but collected on implementation, a common charge across the Central Zone with further costs sought through negotiation for the Isle of Dogs with a target of £160 pms on Gross External area.

The SPG reflects this option in seeking £218.30 pms (on Gross External area) with higher costs sought for the Isle of Dogs (due to greater overcrowding). No costs will be sought beyond the Central Zone, except where it is justified in terms of Circular 5/05 and development plan policies in the London Plan. These formula and charges, in line with Circular 5/05, will not be applied as a blanket charge. The Mayor will carefully consider any case where it can be demonstrated that making a contribution under the SPG guidelines will affect the economic viability of the development.

## Box 2.2 Central Activities Zone (CAZ)

The London Plan (para. 5.171) states that:

*The Central Activities Zone (CAZ) contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. Other key uses and activities, such as those associated with retail, tourism, culture and entertainment, are also concentrated in CAZ, together with London's two 'International' shopping centres, centred on the West End and Knightsbridge. Though the CAZ is small in geographical and population terms, it contains nearly 30% of all London's jobs and is projected to accommodate 36% of London's employment growth to 2026.*

Paragraph 5.175 states:

*Growth within the Zone will be driven by expansion of London's functions as a global and national centre and some of those functions associated with its regional and metropolitan roles. There are 1.37 million jobs in CAZ. A combination of market trends, accessibility and development capacity suggest employment could grow by 305,000 between 2006 and 2026 with capacity for a further 110,000 in Canary Wharf. Over 60% are expected to be office based, principally in the globally important business services sector, but almost 40% are projected to be in a range of other services such as the retail and leisure sectors.*

The boroughs contained within the CAZ area are the City of London; Westminster; Kensington & Chelsea; Camden; Islington; Lambeth, Southwark, Wandsworth, Hackney; and Tower Hamlets.

In relation to office developments (for which the Crossrail charge will apply), **Policy 5G.3 Central Activities: Offices** is relevant and states:

*The Mayor will and boroughs and other relevant agencies should:*

- *recognise that CAZ is the country's most important strategic office location and ensure adequate capacity to meet future demand with supporting policies to enhance it as a globally attractive business location*
- *in appropriate locations within the western part of CAZ, work with stakeholders in the office market to identify and bring forward office capacity, and, without compromising the local environment, seek solutions to the constraints on office provision imposed by extensive heritage designations including the role of high quality design in complementing these*
- *within CAZ and the north of the Isle of Dogs Opportunity Area, wherever increases in office floorspace are proposed they should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.*

## Consultation with the London Assembly and the GLA Group Functional Bodies

On 4<sup>th</sup> December 2008, the Mayor wrote to the Chair of the London Assembly and to the GLA Group Functional Bodies to consult them on his proposed alteration to the London Plan and accompanying draft Supplementary Planning Guidance (SPG). A number of changes were made to the policies and the SPG following this internal consultation, these included:

- A clear target for funding within Policy 3C.12A;
- That funding contributions will have regard to the 'impacts of different types of development in particular locations' within Policy 3C.12A;
- Funding contributions will have regard to the 'economic viability of each development concerned' within Policy 3C.12A;
- The text of Policy 3C.12A also details that developments outside of the central areas will be targeted for the collection of Section 106 contributions where appropriate;
- Policy 6A.4 has been further amended to include 'where this is appropriate' with regard to the priority given to funding Crossrail; and
- The funding of Crossrail should normally be given a higher priority than other public transport improvements, this has been included in Policy 6A.4.

These changes have been brought in to clarify a number of questions raised during the consultation process. The aim of these changes is to ensure that the proposed new and amended policies are as clear as possible and that they adhere to the guidance of Circular 5/05.

### **The IIA of the Policy Alterations**

An IIA is being undertaken on the proposed policy alterations. To avoid duplication of assessment and in line with Government policy, a separate IIA has not been undertaken on the SPG. However, given that the policy alterations and the SPG are closely linked it was felt appropriate to consider whether the SPG results in any additional effects that may not have been identified in the assessment of the policy alterations. Therefore, the key sustainability issues related to the SPG have been identified in Box 2.2.

<b>Box 2.3 Sustainability issues relating to the SPG</b>		
<p>The SPG has been developed to provide more guidance for the policy alterations (policies 3C.12A, 6A.4 and 6A.5). The SPG is designed to help both planning officers and developers understand and comply with the policy alterations. Much of the mechanics of the policies is expanded upon in the SPG. The SPG takes the policies and defines the geographical scope of the policies, the types of development which will be affected and the proposed tariffs. The use of an SPG to drive the new policies will provide clarity for developers and allow them to include any potential costs in assessing the viability of developments. The SPG will also be able to be revised and updated more readily than the London Plan policies.</p>		
<b>Key component of SPG</b>	<b>Rationale</b>	<b>Key sustainability issues</b>
Defined location where contributions will be sought	Areas defined by background studies into transport and costs (see Box 2.1)	By clearly defining the areas to which contributions will be sought the SPG provides a greater degree of certainty to developers and helps to establish the link between accessibility and economic benefit.
Defined development types to which tariffs will apply	The baseline reports (Box 2.1) show that offices have the greatest impact on peak hour use of rail in London.	By identifying the development types which stand to gain the most from improved transport links the SPG provides a greater degree of certainty to developers and helps to establish the link between development type and economic benefit.
Clearly defined tariffs	Tariffs built on a clear rationale will allow developers to plan for costs at an earlier stage and provide them with more certainty	Tariffs which are clear and easy to understand will benefit developers as they will be able to build the cost in from an earlier stage. In the short term the tariffs have the potential to delay development, especially in the current economic climate where the viability of development is finely balanced. However, there are measures in place to offset and avoid this and in the longer term (as the market recovers) and as pricing adjusts any effects are likely to be less significant.

The proposed policy alterations focus on securing funding for Crossrail (through Section 106) and not securing planning permission for the project. Crossrail has already received planning and other consents it requires through the Crossrail Act 2008. This means that the IIA assesses the effects of the *policies*, which are concerned with funding (and not granting permission for Crossrail).

For example, the IIA will consider questions such as:

- Will developers avoid locations where investment is sought?

- Will investment be diverted from other funding needs (e.g. childcare, the environment)?
- Will the type of development being proposed (e.g. residential, commercial, percentage of affordable housing) differ as a result of the contributions?
- Will the scale of development differ?

The IIA will not consider the effects of the infrastructure projects themselves (because these are not a result of the contributions). Therefore, the IIA will not, for example, consider the effects of Crossrail on ecology or water quality. Indeed, these effects have already been considered in a number of separate assessments (for example, the Environmental Impact Assessment for Crossrail<sup>8</sup> and the Equalities Impact Assessment for Crossrail<sup>9</sup>).

### **Realistic Alternatives**

A key requirement of IIA is the consideration of reasonable alternatives (or options). The realistic alternatives relate to different means for generating developer contributions and these are outlined below. Alternatives to the infrastructure projects will be identified at the project level (where required to do so), for example, the Environmental Statement undertaken as part of the EIA for Crossrail identified main alternatives to the proposals.

The reasonable alternatives identified for the policy alterations are:

**Business as Usual (status quo):** The ‘business as usual’, which represents not having the policy alterations and depending on the existing adopted policies in the London Plan. Under this option the Mayor would not prepare the alterations, the SPG and alternative means of meeting the funding gap would have to be sought (for example, through further Government subsidies, increased business rates or more likely through fare increases or the dropping of other transport projects).

**Policy Alteration Option (the preferred option):** This option represents making policy amendments to the London Plan to clarify priorities in planning obligations towards Crossrail, to refer to the Community Infrastructure Levy and to emphasis the strategic importance of Crossrail. Within this broad option, other more detailed options have been explored by the Mayor and are presented in the SPG (set out below). For example, they may relate to the levels of standard charges, the development uses which will be captured by the alterations etc. Where feasible and appropriate the key sustainability issues/effects of these options have been identified and assessed.

Box 2.4 identifies the funding streams currently being used to fund Crossrail. A contribution from developers (through obligations) represents a small proportion of the total cost of the infrastructure.

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<sup>8</sup> <http://billdocuments.crossrail.co.uk>

<sup>9</sup> [www.crossrail.co.uk/pages/crossrailequalityimpactassessment.html](http://www.crossrail.co.uk/pages/crossrailequalityimpactassessment.html)

## Box 2.4 The funding of Crossrail

A £16bn funding package was announced in 2007 and will be sourced from the following funding streams:

- Government will provide over £5bn through the Department for Transport.
- Crossrail fare payers will contribute approximately one third of the cost through servicing the debt raised during construction.
- London businesses:
  - Direct contribution by key beneficiaries, such as Canary Wharf Group, City of London Corporation, BAA.
  - Supplementary business rates will be raised (likely to be approximately 2 pence per pound of rateable value from 2010) providing £3.5bn to service debt.
  - Securing contributions from developers, both through use of planning obligations (S106) and the Community Infrastructure Levy (CIL) once implemented. The Government anticipate that £300 million will be raised through S106 (likely £100 million of this will be raised prior to construction) and £300 million through CIL.

Source: Heads of Terms published 26<sup>th</sup> November 2007

## Detailed options which informed the policy alterations and the SPG

A number of key scenarios were investigated as part of the development of the policy alterations and SPG. The bases for these options are the Crossrail: Development and Funding report<sup>10</sup> and the Crossrail Section 106 Contributions report<sup>11</sup>. The following scenarios were presented in the Development and Funding report:

- Offices only within the Central Zone;
- Offices, retail and hotel only within the Central Zone;
- Offices, retail, hotels and residential within the Central Zone;
- Central and Outer London Zones offices only; and
- Central and Outer London Zones offices, retail and hotel only.

In addition two scenarios with a higher charge for the Isle of Dogs were considered:

- Central Zone offices only with a 25% higher rate for the Isle of Dogs; and
- Central Zone offices only with at £323 psm / £30psf in the Isle of Dogs.

The different scenarios (described above) are unlikely to create significantly different effects (against the IIA Objectives). This is because the level of funding required for Crossrail would remain the same and whilst the burden for each development may differ this is not anticipated to result in any significant changes on the ground. This is largely due to the fact that the developments which will most contribute to congestion, and therefore the need for Crossrail, are offices in the central parts of London. In some cases

<sup>10</sup> Transport for London (2008) *Crossrail: Development and Funding Contributions 2008*. By Jones Lang LaSalle.

<sup>11</sup> Transport for London (2008) *Crossrail Section 106 Contributions*. By Colin Buchanan.

there may be minor variations from those effects observed under the Preferred Option these would relate to the different levels of funding sought from residential and hotel developments, particularly in relation to the housing objective. If there was any change here it is anticipated that it would increase the uncertainty of the policy effects into the long term (please refer to the assessment Table 3.5).

### **Options for Implementing the Policy Alterations**

Guidance for implementing the policy alterations is detailed within the SPG (described in Section 0). The SPG outlines how the policy alterations will be applied to secure contributions towards the funding of Crossrail. The SPG describes the details of the standard charges and formula that will be applied to work out the contributions to be made in each case. The details also include where the charge will apply, what type of development is covered, the level at which the charge will be set, and how it will be collected and monitored.

These details have been developed and are based on the findings of two background technical reports (available on [www.london.gov.uk/mayor/planning/crossrail/index.jsp](http://www.london.gov.uk/mayor/planning/crossrail/index.jsp)). These technical reports underpin the proposed alterations and the accompanying SPG.

The report prepared by Colin Buchanan (TfL, 2008) investigates the impact which development in London has on public transport within the capital. The report prepared by Jones Lang LaSalle investigates the viability of a planning obligation charge on development in different parts of London and for different types of land use. Both reports explore a number of different options in terms of the contribution of development to crowding on the rail network. These are outlined in Box 2.5 and Box 2.6.

#### **Box 2.5 Transport for London (2008) Crossrail Section 106 Contributions, by Colin Buchanan**

The report prepared by Colin Buchanan sets out relative values of crowding cost, looking at the different effects of land uses on the rail network at different times. Impact was measured as crowding on the rail network and which was found to depend on the following variables:

- The level of trip generation in the morning peak period (the busiest time of the day);
- The rail mode share appropriate for that development type and that geographic location; and
- The crowding impact associated with rail trips to different destinations within London.

The analysis shows that the biggest effect on relative crowd impact comes from commercial developments within the Central Activities Zone (CAZ) and the northern area of the Isle of Dogs. Smaller effects are felt as a result of retail developments in the CAZ and for commercial developments within 800m of stations outside of the CAZ.

**Box 2.6  
LaSalle**

**Transport for London (2008) Crossrail: Development and Funding Contributions 2008, by Jones Lang**

The report prepared by Jones Lang LaSalle looked at a number of options based on development use and location, which are detailed under the policy alteration option in Section 2.4.

The preferred option proposed by Jones Lang LaSalle is as follows:

- Office only;
- Central London Zone (CAZ plus the northern part of Millwall/Blackwall wards on the Isle of Dogs);
- Charging against net increase in office space over previous office levels;
- Levy incurred at the date that planning permission is granted but collected on implementation;
- A common level of charge across the Central London Zone with more through negotiation sought in the Isle of Dogs;
- Indexation at a fixed, pre-determined rate; and
- Target net levels of £215.28 per square meter.

The final tariff which was taken forward was a minor alteration to the preferred option based on the base case with a target Gross External area tariff of £160.00 pms in the CAZ and £218.30 pms in the Isle of Dogs.

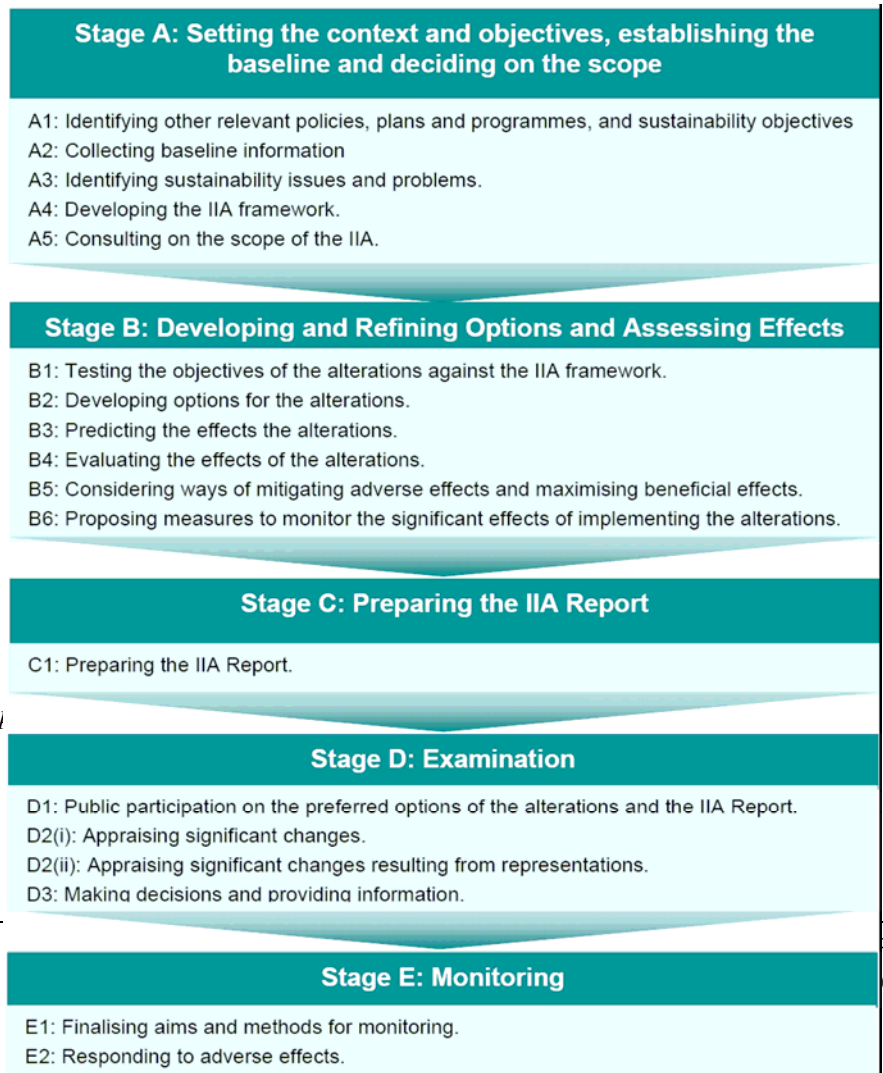
**The Assessment Process**

**Introduction**

The approach adopted for the IIA of the policy alterations is outlined in the diagram. The approach is based on the five main stages of SA as identified in guidance issued by the ODPM (2005)<sup>12</sup>.

The first stage (Stage A) of the IIA process involves setting the context and establishing the baseline against which the alterations to the London Plan can be appraised. The key output of the first stage is this Scoping Report (which was consulted on by statutory and selected non-statutory consultees

<sup>12</sup> ODPM, November 2005 ‘Sustainability A



from the 10<sup>th</sup> December 2008 to the 21<sup>st</sup> January 2009).

## **Scope of the IIA**

The scope of the IIA includes environmental, social (including health and equality) and economic issues to provide a wider ranging assessment of the potential effects of implementing the policy alterations. In order to produce the Scoping Report, the IIA process requires a review of relevant plans and programmes as well as the collation and analysis of baseline evidence. This will help identify key issues and will inform the development of a set of IIA objectives that will be used to assess the alterations.

**Section 3.1.2** sets out the core topics required for consideration by the SEA Directive and the relationship they have with the alterations. **Section 3.1.3** sets out the geographic scope of the SEA, e.g. the general level and coverage of effects that the assessment will focus on.

## **Thematic Scope of the Proposal Assessment**

The topics to be addressed by the IIA have been informed primarily by the SEA Directive. Annex I of the SEA Directive states that the assessment should include information on the “*likely significant effects on the environment, including on issues such as:*

- (i) biodiversity*
- (ii) population*
- (iii) human health;*
- (iv) fauna;*
- (v) flora;*
- (vi) soil;*
- (vii) water;*
- (viii) air;*
- (ix) climatic factors;*
- (x) material assets;*
- (xi) cultural heritage, including architectural and archaeological heritage;*
- (xii) landscape; and*
- (xiii) the inter-relationship between the issues referred to in heads (i) to (xii).”*

In accordance with the SEA Directive, the potential effects that may arise from the implementation of the alterations on each of the issues identified above have been considered as part of this IIA Report. The range of reasonable alternatives to the alterations and the effects that they and the alterations, could have during implementation on people and the environment suggest that the potential effects may be limited (due to the financial nature of the proposals). However, for consistency with previous IIAs (and SAs) all of the areas identified by the SEA Directive are considered in the assessment and no topics (or IIA objectives) are ‘scoped out’.

In addition to those issues identified by the SEA Directive, the SEA has been expanded to cover social and economic issues such as economy, society, education, skills, traffic and transport, and equality and diversity. This reflects the requirement of the *Government Office for London Circular* (Section 2.7) for the London Plan (and its alterations) to have regard for:

- The effect on the health and health inequality of persons in Greater London;
- The effect on climate change, and the consequences of climate change; and
- The achievement of sustainable development in the United Kingdom.

This approach also enables a more comprehensive assessment of the effects to be undertaken, allowing for a more explicit examination of the likely effects that may arise against such issues.

### **Geographic Scope of the Proposed Assessment**

The IIA assesses the potential effects of the alterations to the London Plan. The assessment includes any areas affected by such impacts within London, and if appropriate, beyond the boundaries of outside London. The geographical boundary of the London Plan is shown on the Key Diagram (page 50 of the London Plan). For the purpose of this assessment the policies are appraised against the whole of London. The areas most likely to be affected by Crossrail are anticipated to be Central London and the Isle of Dogs<sup>13</sup>. These areas are given particular attention as any Section 106 contribution, in accordance with Circular 05/2005, must be:

1. Relevant to planning;
2. Necessary to make the proposed development acceptable in planning terms;
3. Directly related to the proposed development;
4. Fairly and reasonably related in scale and kind to the proposed development; and
5. Reasonable in all other respects.

### **Habitats Regulations Assessment**

Entec reviewed an early draft of the proposed alterations with regard to their compliance with the requirements of the Habitats Regulations, and the need for Appropriate Assessment. It is concluded that (as they stood in the summer of 2008) the policies were deemed to have ‘no adverse effects upon European sites’ and as such, require no further assessment in relation to these regulations. This is primarily because these policies do not in themselves lead to new development.

However, one of the early drafts of the proposed policies was identified by the GLA as having the potential to result in new development, associated with transport links in London that could feasibly result in direct or indirect

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<sup>13</sup> Colin Buchanan (2008) Crossrail Section 106 Contributions.

adverse effects upon European Sites. However, this policy is no longer being amended in these alterations. In order to demonstrate compliance with the Habitats Regulations, Entec has prepared a short screening exercise that documents the process in a Technical Note (see Appendix B).

A short meeting was held with Natural England on the 28<sup>th</sup> August to discuss the provisional findings of the Habitats Regulations Assessment and to discuss the early results and the ongoing methodology.

### **Review of Plans and Programmes**

The purpose of reviewing plans and programmes as part of the IIA is to ensure that the relationship with these other documents is fully explored and to ensure that the relevant environmental protection and sustainability objectives are taken on board through the IIA. Reviewing plans and programmes can also provide appropriate information on the baseline for the plan area and the key sustainability issues. The GLA has already considered a number of documents in the preparatory work for the proposed alterations. However, to meet the IIA’s requirements a broader range of documents was considered, in particular those international, national and regional documents that are likely to have relevant environmental protection and sustainability objectives. Plans and programmes relevant to the proposed alterations have been identified and reviewed<sup>14</sup>. These documents are listed in **Table 3.1** and are reviewed in **Appendix C**. This review identifies objectives and targets which will have implications for the IIA and illustrates how they have been taken on board by the IIA. Since the relevant objectives identified in these documents have been integrated within the IIA objectives – synergies and inconsistencies are highlighted during the appraisal process.

**Table 3.1 Additional Plans, Programmes and Strategies**

<b>Plan, Programme and Strategy</b>
The Planning Act 2008
Mayor of London (August 2008) The London Climate Change Adaptation Strategy - Draft Report.
CLG (August 2008) The Community Infrastructure Levy.
Crossrail Act 2008
Draft River Basin Management Plan Thames River Basin District (2008)
UK Climate Change Act 2008
Future Water, the Government’s Water Strategy for England (2008)
Draft Heritage Protection Bill (2008)
CLG (2007) Homes for the future, more affordable, more sustainable, CLG, London.
GLA (April 2007) Evidence Base: Climate Change in the Further Alterations to the London Plan

<sup>14</sup> A broad range of plans and programmes were identified and reviewed in the Scoping Report (January 2006) and this review has not been duplicated here.

## Plan, Programme and Strategy

HM Government of Great Britain. Greater London Authority Act. 2007.  
 Business Rate Supplements: A White Paper (October 2007)  
 Planning Policy Statement: Planning and Climate Change Supplement to PPS1 (2007)  
 Planning Policy Statement 25: Development and Flood Risk (2006)  
 Planning Obligations Community Benefit Strategy (2006) London Thames Gateway Development Corporation.

The review of these documents is contained in Appendix C.

## Baseline Information and Key Issues

An essential part of the IIA process is the identification of the current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their significance, that the issues which the alterations should address can be identified and its subsequent success or otherwise be monitored. However, as the alterations are solely concerned with securing funding for Crossrail, the scope of relevant baseline information should be more narrowly defined. The evidence base identified in the Scoping Report for the *First Review of the London Plan* (January, 2006) was suitable for assessing a wide range of spatial policies and as such is not all relevant to the Crossrail Funding alterations. Therefore, a Scoping Report was consulted upon specifically for these alterations in December 2008. This Scoping Report contained more specific information which has in light of consultation comments been updated.

A number of sustainability issues were identified in the Scoping Report (December, 2008) these are presented in Table 3.2. This assessment is focussed upon a mechanism for funding Crossrail and as such some of these issues are unlikely to be significantly influenced by the proposed alterations. This list of issues is not exhaustive and has been revised following the consultation on the Scoping Report and a workshop held in January 2009.

**Table 3.2 Key Sustainability Issues for London**

Key Sustainability Issues	Relevance to Proposed Alterations
A. <b>Climate Change.</b> London's impact on the climate and the current and future threat of climate change to London's population, wildlife, cultural heritage and material assets.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to respond and adapt to climate change.
B. <b>Biodiversity.</b> The conservation of biodiversity across the city (from the central urban core through suburbia to the surrounding green belt) in ways that enhance and promote ecological function.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to improve biodiversity.
C. <b>Access to Nature.</b> Improving the public realm and increasing people's opportunity for contact with nature and open space.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to improve the provision of open space and green infrastructure.

Key Sustainability Issues	Relevance to Proposed Alterations
D. <b>Natural Resources.</b> London's rising consumption per capita of natural resources.	The alterations are unlikely to have significant effects on this key issue.
E. <b>Waste.</b> The volume of waste generated and put to landfill and the need for an integrated sustainable approach to managing it from reduction through to re-use, recycling and reprocessing.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures such as waste infrastructure.
F. <b>Water Quality and Resources.</b> Climate change, population growth and lifestyle choices are all placing increasing demands on London's water supplies - at the same time millions of litres of water are being wasted in London every day.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from infrastructure and schemes designed to improve water quality and strengthen water infrastructure.
G. <b>Air Quality.</b> London's air is still polluted and is the worst of any city in the UK and amongst the worst in Europe. The primary cause of poor air quality in London is emissions from road traffic, although emissions from residential and workplace heating are also substantial.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to improve air quality in the capital.
H. <b>Historic Environment.</b> The quality of the cityscape, which may come under increasing pressure from competing land uses.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to conserve and enhance the historic environment.
I. <b>Health and Well-being.</b> Poor health outcomes and a widening disparity of relative wellbeing across London boroughs (across a range of health issues) and the relative impacts on the capacity of Londoners' to engage economically and socially.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from health facilities and services or if funding for neighbourhood regeneration is diverted.
J. <b>Housing.</b> Affordability, level of provision, quality, sustainable design and specification and location of housing in London, and its impacts on access, mobility, sense of place and resource use.	✓ The alterations may be relevant to this key issue, for example a mixed use scheme an additional tariff could reduce the proportion of affordable houses the developer could viably build.
K. <b>Safety and Security.</b> Levels of crime and perceptions of safety from the fear of crime and its relationship to sense of place and community.	The alterations are unlikely to have significant effects on this key issue.
L. <b>Education and Skills.</b> Levels of indigenous skills and worklessness in London (and their distribution by gender, age, ethnicity and disability) and the mismatch between skills and employment.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from measures to improve education and skill across the capital.
M. <b>Employment and the Economy.</b> London's levels of unemployment have risen to 6.7%, the highest of any Government Office Region other than the North East and the employment rate has remained on a downward trend over the last year. However, London is still the largest economy of the UK regions.	✓ The alterations may be relevant to this key issue, for example, this may be due to the additional financial burden placed on developers and also the economic benefits of improved transport links to London's key business centres without increasing fares or taxes to cover any deficit.
N. <b>Cultural, Ethnic, Faith-based and Racial Diversity.</b> The need and desire to build on the strengths of London's cultural, ethnic, faith-based and racial diversity.	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from health facilities and services.  A separate Equality Impact Assessment has been undertaken and will be used to guide assessment.
O. <b>Poverty and Social Exclusion.</b> The increasing disparity in quality of life across social groups and the impact of poverty on access to key social, environmental and economic infrastructure such as housing, affordable warmth, transport, education, employment, childcare, healthy food outlets, and health	✓ The alterations may be relevant to this key issue, for example, if funding was diverted away from health facilities and services.

Key Sustainability Issues	Relevance to Proposed Alterations
care. As well as the level of physical, social and economic degeneration and multiple disadvantage experienced by specific communities/locations in London.	A separate Equality Impact Assessment has been undertaken and will be used to guide assessment.
P. <b>Accessibility/Affordability.</b> Lack of access to goods, key services, facilities, employment and other amenities and the continued emphasis on travel by car rather than by public transport, on foot or by bicycle. The difficulties in travelling around London, with heavy traffic and slow and unreliable journey times.	The alterations are unlikely to have significant effects on this key issue.
Q. <b>Social and Environmental Performance of Organisations.</b> The social and environmental contributions of private and public sector organisations towards the building of sustainable communities is an important issue for London.	The alterations are unlikely to have significant effects on this key issue.
R. <b>Regeneration, Land use and the Olympic Games.</b> Ensuring the opportunities for generating a lasting and sustainable legacy from the Olympic Games are maximised, particularly for East London communities.	✓ The alterations may be relevant to this key issue.
S. <b>London as a World and UK Tourist Destination.</b> The need and desire to make tourism sustainable and ensure that all of London benefits.	The alterations are unlikely to have significant effects on this key issue.
Note: The key issues are taken from: Greater London Authority (January 2006) <i>Sustainability Appraisal of the London Plan (First Review): Scoping Report</i> .	

Table 3.2 shows the issues that are identified as potentially relevant, primarily because of effects on funding: for example the possibility that funding will be diverted from these resources into the Crossrail project and the possibility that the terms of S106 agreements will place new restrictions on the way in which funding is used, with Crossrail being prioritised above other funding outcomes (see proposed funding hierarchy within Policy 6A.4).

Both the ‘Crossrail Section 106 Contributions’<sup>15</sup> and the ‘Crossrail: Development and Funding Contributions 2008’<sup>16</sup> reports contain a detailed analysis of the relationship of the proposed policies to transport capacity and the gross development, by type, within London. The baseline information presented within these reports is not reproduced here, but is referenced within this report.

### **IIA Objectives**

The IIA objectives and “appraisal criteria” are components of a framework that are used consistently to appraise the policy alterations<sup>17</sup>. However, whilst a range of IIA Objectives are proposed in Table 3.3 it is likely that many of these will not be relevant to the policy alterations.





**Table 3.3 IIA Objectives and Appraisal Criteria**






IIA Objective	Appraisal Criteria
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<sup>15</sup> *On behalf of Transport for London by Colin Buchanan* (2008) Crossrail Section 106 Contributions.





<sup>16</sup> *Jones Lang LaSalle* (2008) Crossrail: Development and Funding Contributions 2008.




<sup>17</sup> Greater London Authority (January 2006) *Sustainability Appraisal of the London Plan (First Review): Scoping Report*.

IIA Objective	Appraisal Criteria
<b>Managing Resources</b>	
 <p><b>1. Biodiversity.</b> To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p>	<ul style="list-style-type: none"> <li>• Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)?</li> <li>• Will it improve the quality and extent of designated and non-designated sites?</li> <li>• Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)?</li> <li>• Will it protect and enhance the region's waterbodies to achieve a good ecological status?</li> <li>• Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment?</li> <li>• Will it bring nature closer to people, especially in the most urbanised parts of the city?</li> <li>• Will it promote respect and responsibility for its wise management?</li> <li>• Will it improve access to areas of biodiversity interest?</li> <li>• To enhance the ecological function and carrying capacity of the greenspace network?</li> </ul>
 <p><b>2. Water Quality &amp; Water Resources.</b> To improve the quality of surface waters and groundwater and to achieve the wise management and sustainable use of water resources</p>	<ul style="list-style-type: none"> <li>• Will it improve the quality of waterbodies?</li> <li>• Will it reduce discharges to surface and ground waters?</li> <li>• Will it support sustainable urban drainage?</li> <li>• Will it improve the water systems infrastructure (e.g. water supply/sewerage)?</li> <li>• Will it reduce abstraction from surface and ground water sources?</li> <li>• Will it reduce water consumption?</li> <li>• Will it help to meet the objectives (and the spirit) of the Water Framework Directive?</li> </ul>
 <p><b>3. Natural Resources.</b> To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured local products.</p>	<ul style="list-style-type: none"> <li>• Will it reduce the demand for natural resources and raw materials from unsustainable sources?</li> <li>• Will it encourage the prudent and efficient use of natural resources?</li> <li>• Will it encourage the use of local sustainable products?</li> <li>• Will it reduce the extraction of minerals?</li> </ul>
 <p><b>4. Climate Change.</b> To address the causes of climate change through minimising the emissions of greenhouse gases and ensuring that London is prepared for its impacts.</p>	<ul style="list-style-type: none"> <li>• Will it minimise emissions of greenhouse gases?</li> <li>• Will it help London meet its emission targets?</li> <li>• Will it protect London from climate change impacts?</li> <li>• Will it minimise the risk of flooding from rivers and watercourses to people and property?</li> <li>• Will it avoid exacerbating the impacts if climate change?</li> <li>• Will it manage existing flood risks appropriately and avoid new flood risks?</li> </ul>

IIA Objective	Appraisal Criteria
 <p><b>5. Air Quality.</b> To improve air quality.</p>	<ul style="list-style-type: none"> <li>• Will it improve air quality?</li> <li>• Will it reduce emissions of greenhouse gases by reducing energy consumption?</li> <li>• Will it help to reduce emissions of PM10 and NO2?</li> <li>• Will it reduce emissions of ozone depleting substances?</li> <li>• Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2000 and (Amendment) Regulations 2002)?</li> </ul>
 <p><b>6. Energy.</b> To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p>	<ul style="list-style-type: none"> <li>• Will it increase the proportion of energy both purchased and generated from renewable and sustainable resources.</li> <li>• Will it reduce the demand and need for energy?</li> <li>• Will it promote and improve energy efficiency (e.g. buildings)?</li> </ul>
 <p><b>7. Waste.</b> To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.</p>	<ul style="list-style-type: none"> <li>• Will it minimise the production of waste?</li> <li>• Will it promote reuse and recycling (e.g. in the design of housing etc)?</li> <li>• Will it help to promote a market for recycled products?</li> </ul>
<p><b>Getting Results</b></p>	
 <p><b>8. Built and Historic Environment.</b> To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings <i>and spaces</i> are appropriately designed and constructed in a sustainable way.</p>	<ul style="list-style-type: none"> <li>• Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential?</li> <li>• Will it conserve and enhance the townscape/cityscape character?</li> <li>• Will it promote high quality design and sustainable construction methods?</li> <li>• Will it respect visual amenity and the spatial diversity of communities?</li> <li>• Will it enhance the quality of the public realm?</li> <li>• Will it protect and enhance areas of open space?</li> <li>• Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace?</li> </ul>
 <p><b>9. Housing.</b> To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</p>	<ul style="list-style-type: none"> <li>• Will it reduce homelessness?</li> <li>• Will it reduce the number of unfit homes and overcrowding?</li> <li>• Will it increase the range and affordability (both upfront and over its lifetime) of housing (taking into account different requirements and preferences of size, location, type and tenure)?</li> <li>• Will it ensure that appropriate services and facilities are in place for the new population?</li> <li>• Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle?</li> <li>• Will it improve the quality of housing?</li> </ul>

IIA Objective	Appraisal Criteria
	<ul style="list-style-type: none"> <li>• Will it increase use of sustainable design and sustainable building materials in construction?</li> <li>• Will it improve energy efficiency and insulation in housing to reduce fuel poverty and ill-health?</li> <li>• Will it provide housing that encourages a sense of community and enhances the amenity value of the community?</li> <li>• Will it improve the wider built environment and sense of place?</li> </ul>
 <p><b>10. Accessibility/ Availability (Transport)</b> To maximise the accessibility to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).</p>	<ul style="list-style-type: none"> <li>• Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> <li>• Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> <li>• Will it reduce traffic volumes and traffic congestion?</li> <li>• Will it reduce the length of commuting journeys?</li> <li>• Will it help to provide a more integrated transport service from start to finish i.e. place of residence to point of service use or place of employment?</li> <li>• Will it increase the number of sub-regional and orbital public transport routes that facilitate locally-based living?</li> <li>• Will it improve accessibility to work by public transport, walking and cycling?</li> <li>• Will it reduce road traffic accidents?</li> </ul>
 <p><b>11. Regeneration &amp; Land-Use.</b> To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities and to improve efficiency in land use through the sustainable re-use of previously developed land and existing buildings.</p>	<ul style="list-style-type: none"> <li>• Will the regeneration have immediate and long-term benefits for deprived areas?</li> <li>• Will it help to make people feel positive about the area they live in?</li> <li>• Will it help to create a sense of place and 'vibrancy'?</li> <li>• Will it help reduce the number of vacant and derelict buildings?</li> <li>• Will it minimise the loss of soils to development?</li> <li>• Will it improve soil quality?</li> </ul>
 <p><b>12. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<ul style="list-style-type: none"> <li>• Will it generate satisfying and rewarding new jobs?</li> <li>• Will it help to provide employment in the most deprived areas and stimulate regeneration?</li> <li>• Will it reduce overall unemployment, particularly long-term unemployment?</li> <li>• Will it help to improve levels of income and help to deliver a living wage to all?</li> <li>• Will it encourage flexibility of work, including voluntary and part-time work?</li> <li>• Will it encourage volunteering and promote the value of unpaid work?</li> <li>• Will it encourage the development of healthy workplaces?</li> </ul>
 <p><b>13. Stable Economy.</b> To encourage a strong, diverse and stable economy and to improve the resilience of businesses and their environmental, social and economic</p>	<ul style="list-style-type: none"> <li>• Will it improve sustainable business development?</li> <li>• Will it improve the resilience of business and the economy?</li> <li>• Will it help to diversify the economy?</li> <li>• Will it prevent the loss of indigenous businesses?</li> <li>• Will it encourage business start-ups and support the growth of businesses?</li> <li>• Will it encourage ethical and responsible investment?</li> <li>• Will it reduce levels of deprivation?</li> </ul>

IIA Objective	Appraisal Criteria
performance.	
 <p><b>14. Creativity and Innovation.</b> To promote creativity and innovation in the environmental and social economy (including new clean technologies, renewable energy, pollution control and the skills sector).</p>	<ul style="list-style-type: none"> <li>• Will it help to diversify the economy?</li> <li>• Will it encourage investment in new technologies, new solutions, new plans and new ideas that contribute to achieving progress towards sustainability?</li> <li>• Will it boost the green technology sector?</li> </ul>
<b>Taking Responsibility</b>	
 <p><b>15. Liveability and Place.</b> To create and sustain liveable, mixed use physical and social environments that promote long term social cohesion, sustainable lifestyles and a sense of place.</p>	<ul style="list-style-type: none"> <li>• Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities?</li> <li>• Will it increase the provision of culture, leisure and recreational activities: this could include quality, affordable and healthy food, as well as cultural, sporting, or leisure opportunities.</li> <li>• Will it provide opportunities for people to choose an active, fulfilling life?</li> <li>• Will it increase the provision of key services, facilities and employment opportunities?</li> <li>• Will it positively enhance and promote the perceived sense of place held by the community?</li> <li>• Will it protect and enhance the provision of open space?</li> </ul>
 <p><b>16. Education and Skills.</b> To maximise the education and skills levels of the population.</p>	<ul style="list-style-type: none"> <li>• Will it increase the opportunities for educational and vocational goals to be achieved through employment and entrepreneurial opportunities?</li> <li>• Will it increase the levels of participation and attainment in education?</li> <li>• Will it improve overall achievement of London's primary and secondary school children?</li> <li>• Will it improve employee education/training programmes?</li> <li>• Will it improve the qualifications and skills of young people?</li> <li>• Will it promote lifelong learning activities?</li> <li>• Will it support the voluntary sector and promote volunteering?</li> <li>• Will it promote sustainable development education?</li> <li>• Will it contribute to meeting skills shortages?</li> </ul>
 <p><b>17. Ownership and Participation.</b> To promote civic participation, ownership and responsibility and enable individuals, groups and communities to contribute to decision-making at neighbourhood, borough and</p>	<ul style="list-style-type: none"> <li>• Will it promote social cohesion and encourage engagement in community activities?</li> <li>• Will it increase the ability of people to influence decisions?</li> <li>• Will it support civic engagement and encourage the involvement and participation of a diverse range of stakeholders?</li> <li>• Will it promote community spirit and encourage community networks?</li> <li>• Will it help to create a sense of place?</li> </ul>

IIA Objective	Appraisal Criteria
regional levels in London	
<b>Developing Respect</b>	
 <p><b>18. Health and Well-being.</b> To maximise the health and well-being of the population and reduce inequalities in health.</p>	<ul style="list-style-type: none"> <li>• Will it reduce poverty and health inequalities?</li> <li>• Will it improve mental and emotional health?</li> <li>• Will it improve access to high quality public services (including health facilities)?</li> </ul>
 <p><b>19. Safety and Security.</b> To enhance community safety by reducing crime, antisocial behaviour and the fear of crime.</p>	<ul style="list-style-type: none"> <li>• Will it reduce actual levels of crime?</li> <li>• Will it reduce the fear of crime?</li> <li>• Will it reduce antisocial behaviour?</li> <li>• Will it reduce actual noise levels and disturbances from noise?</li> <li>• Will it reduce the risk of terrorist attack?</li> </ul>
 <p><b>20. Equality and Diversity.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p>	<ul style="list-style-type: none"> <li>• Will it reduce poverty and social exclusion in those areas and communities most affected?</li> <li>• Will it promote a culture of equality, fairness and respect for people and the environment?</li> <li>• Will it promote equality for black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups?</li> <li>• Will it benefit the equality target groups listed above?</li> </ul>

## Assessing Sustainability Performance

Table 3.5 contains the appraisal of the four new and altered London Plan policies against the IIA objectives. The IIA objectives are detailed in the left hand column, the appraisal criteria however have been omitted in order to make the appraisal matrix as clear as possible (the appraisal criteria have been used in the appraisal and are presented in Section 3.5). The matrix also includes the timescale of the effect and a commentary. These are briefly explained below:

- **Timing of Effect** - Will the effect manifest itself in the short, medium or the long term? In the context of the alterations to the London Plan the short term can be interpreted as being within the first three years or so of the Alterations, the medium term within from 3 – 8 years (by which time Crossrail should be operational), and the longer term beyond this. The charges will apply until the fully money has been paid or the plan runs out in 2026, whichever occurs first.
- **Commentary** - The commentary text within the matrix and summary text identifies possible mitigation measures, in the form of amendments to policy or inclusion/removal of policy to increase the opportunity for sustainable development. Where a score is indicated as ‘uncertain’ the

commentary should identify ways in which this uncertainty could be reduced, for example, through additional data collection or further consultation with experts.

- **Cumulative effects** - As well as the temporary/permanence and likelihood of the effects are identified within the commentary.
- **Geographical effects** - The policy alterations will be apply where it is reasonable to do so, as defined in Circular 5/05. The text accompanying Policy 3C.12A details that it is proposed that contributions will be sought in the Central Activities Zone, the Isle of Dogs and outside this area as appropriate (in line with government guidance).

Each of the policy alterations has been considered against each of the IIA Objectives in the matrix in Table 3.3. This assessment has been undertaken by the appraisal team. It has been informed by expert judgement from various technical specialists including key stakeholders and consultees. The commentary aims to identify the extent to which the alterations promote the achievement of integrated environmental, economic and social development equally. The commentary also highlights the extent to which competing objectives exist and how this has been or could be considered. A scoring system has been used to accompany commentary which follows the system outlined in Table 3.4.

**Table 3.4 Possible Alignment between the Policies and the IIA Objectives**

Alignment	Description	Symbol
Major Positive Impact	The proposed policy alteration contributes significantly to the achievement of the objective.	++
Minor Positive Impact	The proposed policy alteration contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed policy alteration does not have any effect on the achievement of the objective	0
Minor Negative Impact	The proposed policy alteration detracts from the achievement of the objective but not significantly.	-
Major Negative Impact	The proposed policy alteration detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed policy alteration and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed policy alteration has an uncertain relationship to the objective or the relationship is dependant on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?

## Uncertainties

There are a number of uncertainties relating to the application and life of the policies, these are as follows:

- How CIL will work in relation to other infrastructure, including flood defence, schools, medical facilities, sporting and recreational facilities and open spaces (it is anticipated that this is clarified through both the secondary CIL legislation and the Mayors guidance) .
- How or whether double charging on CIL and S.106 will be avoided.
- The effect and duration of the economic downturn and its effects on the collection of contributions from developers.
- How implementation of the tariff will effect (if at all) the development of office space (and mixed use development) in London. The viability report produced by Jones Lang LaSalle<sup>18</sup> recommends the following *'All things considered, a low, simple tariff at say £107.64 psm (£10 psf) on gross / £215.28 psm (20 psf) on net increase or less should not materially deter development provided that it is signalled in advance and can be factored in as one of the costs of production.'* (This has been adjusted and is set out in the SPG as £160.00 Gross External area within the CAZ and £218.30 in the IoD.)
- How the funding of Crossrail will alter the funding of other aspects (see Table 3.2) which currently benefit from Section 106 money.

## Technical difficulties

There were a number of technical difficulties encountered during the IIA, these included:

- Undertaking an IIA of policy alterations which were essentially concerned with funding.
- Undertaking an IIA of the policy alterations, when much of the supporting information for implementing the policies would be included within a separate SPG (which was not required to have an IIA).

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<sup>18</sup> Jones Lang LaSalle (2008) Crossrail: Development and Funding Contributions 2008.

Table 3.5 Appraisal of the proposed policy alterations

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
<b>Managing Resources</b>				
<b>1. Biodiversity.</b> To conserve and enhance natural habitats and wildlife and bring nature closer to people.	?	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to protect and enhance biodiversity in the medium and long-term. Significant effects on the conservation and protection of natural habitats are therefore considered unlikely in these timescales. Furthermore, contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so. However, in the short-term there is the potential for funding to be diverted from conservation measures towards Crossrail. This is uncertain and would vary on a case by case basis.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> These policies maintain a need to consider local as well as strategic considerations. There may be concerns that the priorities in planning obligations result in funding being diverted away from projects to protect and enhance biodiversity towards Crossrail. However, if this was the case the magnitude of this effect is not anticipated to be large enough to create significant effects and is therefore scored as neutral.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that open spaces are included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>2. Water Quality &amp; Water Resources.</b> To improve the quality of surface waters and groundwater and to achieve the wise management and sustainable use of water resources.	0	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures to improve water quality and water resources in the medium and long term. Significant effects on water quality and water resources are therefore considered unlikely. Contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so. Furthermore, in respect of the Water Framework Directive, the proposed alterations should not result in a deterioration of the status of waterbodies or prevent the attainment of the goal of 'good ecological status'.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> These policies maintain a need to consider local as well as strategic considerations. There may be concerns that the priorities in planning obligations result in funding being diverted away from projects to protect and enhance water quality and resources (e.g. SuDS) towards Crossrail. However, if this was the case the magnitude of this effect is not anticipated to be large enough to create significant effects and is therefore scored as neutral.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. It is acknowledged that the CIL may be used to provide infrastructure related to improving water quality and resources (e.g. urban drainage), the extent to which CIL contributions will be diverted, if at all, to fund Crossrail as opposed to water quality and resource infrastructure (if at all) is uncertain.
<b>3. Natural Resources.</b> To minimise the global, social and	0	0	0	<b>Policy 3C.12A:</b> No significant effects are anticipated against this objective.

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
environmental impact of consumption of resources by using sustainably produced, harvested and manufactured local products.	0	0	0	<b>Policy 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>4. Climate Change.</b> To address the causes of climate change through minimising the emissions of greenhouse gases and ensuring that London is prepared for its impacts.	0	0	0	<b>Policy 3C.12A:</b> Large areas of Central London rely on flood defences. The costs for maintenance and improvements to these flood defence schemes is partly funded by planning obligations and in the future would be partly funded by the CIL. Seeking agreements on S.106 funding from developers for Crossrail is not envisaged to change the value of contributions agreed for flood defence schemes in London. Therefore, this has been scored as neutral.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> The inclusion of a 'where appropriate' caveat (within policy 6A.4) emphasises the case by case consideration of where contributions should be made. The inclusion of Crossrail within Policy 6A.4 is unlikely to have any implications for climate change on London.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that flood defences are included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>5. Air Quality.</b> To improve air quality.	0	0	0	<b>Policy 3C.12A; 6A.4 and 6A.5:</b> It is not anticipated that there will be any direct, indirect or cumulative effects against this IIA Objective as a result of the two new policies and the two amended policies.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>6. Energy.</b> To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.	0	0	0	<b>Policy 3C.12A:</b> No significant effects are anticipated against this objective.
	0	0	0	<b>Policy 6A.4:</b> No significant effects are anticipated against this objective.
	0	0	0	<b>Policy 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. There might be potential for energy infrastructure to be included, particularly if there is a drive for reinforcement of energy infrastructure to reduce wastage and increase sustainability. As the CIL is yet to be defined effects are uncertain though this might need review on publication of the mayor's guidelines.
<b>7. Waste.</b> To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.	0	0	0	<b>Policy 3C.12A; 6A.4 and 6A.5:</b> It is not anticipated that there will be any direct, indirect or cumulative effects against this IIA Objective.

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
recovery rates.	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>Getting Results</b>				
<b>8. Built and Historic Environment.</b> To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings and spaces are appropriately designed and constructed in a sustainable way.	?	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to enhance and protect the built and historic environment in the medium and long term. Significant effects on this IIA Objective are therefore considered unlikely. Furthermore, contributions will still be sought through S.106 agreements where it appropriate to do so.  There are a large number of projects within London which contribute to heritage funding through S.106 agreements. These contributions are generally agreed on a site by site basis. Where contributions are also sought to fund Crossrail there is the potential that the funding available to enhance and protect the historic environment is influenced, particularly in the short term. This is uncertain and may vary on a case by case basis.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> These policies now include reference to Crossrail but continue to stress the importance of seeking a full cost for all provision which is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area. There may be concerns that the priorities in planning obligations result in funding being diverted away from projects to enhance and protect the built and historic environment towards Crossrail. However, the magnitude of any effect is not anticipated to be significant and is therefore scored as neutral.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>9. Housing.</b> To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability	?	0	0	<b>Policy 3C.12A:</b> The inclusion of Crossrail for S106 contributions is not anticipated to have an effect on the provision of affordable housing. The provision of facilities and services should also be unaffected as these obligations will be negotiated on a case by case basis (also the proposals are relate to office space). There is the potential for effects on the proportion of affordable housing to be affected in the short term until Crossrail 106 contributions become a calculated cost of development.
	?	0	0	<b>Policy 6A.4 and 6A.5:</b> The inclusion of Crossrail within these policies will not alter the importance given to affordable housing and as such is unlikely to result in any changes to the level of funding for affordable housing other than in the short term as discussed above.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that affordable housing is included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
<b>10. Accessibility/ Availability (Transport).</b> To maximise the accessibility to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).	?	?	0	<b>Policy 3C.12A:</b> This policy affects the level of additional funding which would otherwise need to be provided by other funding mechanisms. There may be concerns that the specific inclusion of Crossrail could impact on the provision of funding for other transport services. However, the existing transport policies within the London Plan and the importance transport issues are given in S.106 and CIL suggests that this is unlikely to be significant in the long term. However, in the short and medium term there is the potential that funding will be diverted from transport measures towards Crossrail. This is uncertain and would vary on a case by case basis.
	?	0	0	<b>Policy 6A.4 and 6A.5:</b> These policies maintain a need to consider local as well as strategic considerations. There may be concerns that the priorities in planning obligations result in funding being diverted away from local transport projects towards Crossrail which is regarded as having a higher importance.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that roads and other transport facilities are included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>11. Regeneration &amp; Land-Use.</b> To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities and to improve efficiency in land use through the sustainable re-use of previously developed land and existing buildings.	?	0	0	<b>Policy 3C.12A:</b> Concerns have been raised that the policy may deter developers away from sites covered by the policy to immediately outside the area covered by the charge. Concerns have also been expressed that the value of these contributions could delay schemes where funding is a key issue.  It is possible that any such delays could have detrimental effects on regeneration and land-use (particularly for larger schemes in areas where regeneration is crucial). However, any potential effects are likely to be more noticeable in the short term as developers and the price paid for land is adjusted to account for the charge in the medium and longer term. To avoid or reduce the risk that developers would not proceed with developments where the contributions are prohibitively expensive each case will be considered on its merits and factors like the viability of a scheme will be taken into account when decisions about contributions are made. For this reason a score of uncertain has been given in the short term.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> As described for policy 3C.12A. It is not anticipated that there will be any effects against this IIA Objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that affordable housing, open space, schools and education facilities are all included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>12. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.	?	0	0	<b>Policy 3C.12A:</b> It is possible that there could be short term effects on employment, particularly relating to the construction industry should the level of planning obligations be prohibitive to or delay development. It is unclear to what extent, if at all, these effects would knock on to employment in the short term. In the medium and long term it is anticipated that effects will be negligible as the market adjusts to the new tariff.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> As detailed for Policy 3C.12A. The inclusion of Crossrail within the Planning Obligations may have implications for the location and amount of office space being developed. However, this is unlikely to be significant and has therefore been scored as neutral.

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>13. Stable Economy.</b> To encourage a strong, diverse and stable economy and to improve the resilience of businesses and their environmental, social and economic performance.	?	?	0	<b>Policy 3C.12A:</b> This IIA Objective is particularly important in the current economic climate. Any additional tariffs or charges have the potential to deter or delay development which would incur those charges. Under circumstances of a buoyant and growing economy it is possible that these effects would be insignificant, but in the current economic climate the potential to discourage or delay development is a key concern. For this reason this Objective has scored uncertain in the short and medium term.  To avoid or reduce the risk that developments will not proceed where the contributions are prohibitively expensive each case will be considered on its merits and factors like the viability of a scheme will be taken into account when decisions about contributions are made.  Note: This score does not reflect the local or regional economic effects that the Crossrail project will have. This is consistent with the overall approach to the assessment.
	?	?	0	<b>Policy 6A.4 and 6A.5:</b> As for Policy 3c.12A. The inclusion of Crossrail in the planning obligation policies of the London Plan may be regarded as having a potentially short term and negative effect on this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.  There may be concerns that if the CIL is set too high that land will not come forward for development. As the CIL Impact Assessment (CLG, 200819) notes 'setting a CIL at too high a level could, at the margin, risk some land not coming forward for development, for example, some brownfield sites that require substantial remediation'. To avoid this risk the Government has built a number of safeguards into the design of CIL. Therefore, the effect of this policy on the economy is scored as uncertain.
<b>14. Creativity and Innovation.</b> To promote creativity and innovation in the environmental and social economy (including new clean technologies, renewable energy, pollution control and the skills sector).	0	0	0	<b>Policy 3C.12A, 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.

## Taking Responsibility

<sup>19</sup> <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1082819.pdf>

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
<b>15. Liveability and Place.</b> To create and sustain liveable, mixed use physical and social environments that promote long term social cohesion, sustainable lifestyles and a sense of place.	?	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to improve liveability and place in the medium or long term. Significant effects on this IIA Objective are therefore considered unlikely. Furthermore, contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so. A study by the British Urban Regeneration Association (BURA) for the London Assembly <sup>20</sup> found that public realm improvements are the second largest funding area (after transport) in London. These contributions are generally agreed on a site by site basis. Where contributions are also sought to fund Crossrail there is the potential that the funding available to enhance 'liveability and place' is influenced, particularly in the short term. This is uncertain and may vary on a case by case basis.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that affordable housing, open space, schools and education facilities are all included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>16. Education and Skills.</b> To maximise the education and skills levels of the population.	?	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to maximise the education and skills of the population in the medium or long term. Significant effects on this IIA Objective are therefore considered unlikely. Furthermore, contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so. A study by BURA <sup>21</sup> found education and health improvements are the third largest funding area in London (drawing on 21% of S.106 expenditure). These contributions are generally agreed on a site by site basis. Where contributions are also sought to fund Crossrail there is the potential that the funding available to maximise education and skills is influenced, particularly in the short term.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> It is not anticipated that there will be any effects against this IIA Objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that schools and education facilities are included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>17. Ownership and Participation.</b> To promote civic participation, ownership and responsibility and enable individuals, groups and	0	0	0	<b>Policy 3C.12A:</b> Inputs into community infrastructure and the promotion of sense of place are both funded in part by S.106 agreements. It is assumed that the Crossrail S.106 costs will be in addition to existing S.106 agreements. If this holds true the effects of this policy will be neutral across the timescale.

<sup>20</sup> London Assembly (2007) *Capital Gains?* By BURA.

<sup>21</sup> London Assembly (2007) *Capital Gains?* By BURA.

Policy				
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)
	Short term	Medium term	Long term	
communities to contribute to decision-making at neighbourhood, borough and regional levels in London.	0	0	0	<b>Policy 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>Developing Respect</b>				
<b>18. Health and Well-being.</b> To maximise the health and well-being of the population and reduce inequalities in health.	?	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to maximise the health and well-being of the population in the medium or long term. Significant effects on this IIA Objective are therefore considered unlikely. Furthermore, contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so. A study by BURA <sup>22</sup> found education and health improvements are the third largest funding area in London (drawing on 21% of S.106 expenditure). These contributions are generally agreed on a site by site basis. Where contributions are also sought to fund Crossrail there is the potential that the funding available to maximise health and well-being is influenced, particularly in the short term. For this reason this policy has scored uncertain in the short term.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. However, it should be noted that schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces are all included in the definition of infrastructure in the Planning Act 2008 and will therefore benefit from CIL.
<b>19. Safety and Security.</b> To enhance community safety by reducing crime, antisocial behaviour and the fear of crime.	0	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to enhance safety and security. Although, it is recognised that the S.106 agreements may be set up to contribute towards local security and CCTV this is unlikely to be significantly affected.
	0	0	0	<b>Policy 6A.4 and 6A.5:</b> No significant effects are anticipated against this objective.
	?	?	?	<b>Policy 6A.5A:</b> This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place.
<b>20. Equality and Diversity.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	0	0	0	<b>Policy 3C.12A:</b> Securing funding for Crossrail through the use of planning obligations is unlikely to divert funding away from measures designed to promote equality and diversity in the medium or long term. Significant effects on this IIA Objective are therefore considered unlikely. Furthermore, contributions will still be sought through S.106 agreements (Policy 6A.4 and 6A.5) where it appropriate to do so.

<sup>22</sup> BURA (2007) Capital Gains?

Policy						
IIA Objectives	Timescale			Commentary/Explanation (to include cumulative and synergistic effects as well as ways in which these may be avoid, mitigated or negated)		
	Short term	Medium term	Long term			
	0	0	0	Policy 6A.4 and 6A.5: No significant effects are anticipated against this objective.		
	?	?	?	Policy 6A.5A: This policy places Crossrail in the frame for CIL contributions and states that the Mayor will prepare guidance and a clear framework. The effects of this policy are therefore scored against this IIA objective as being uncertain, particularly because CIL is not yet in place. An EqlA has been undertaken and the results are reflected in the outcome presented here.		
<p><b>Overall Commentary:</b> Policies 3C.12A, 6A.4 and 6A.5 are not considered to have any significant positive or negative effects against the objectives which they were assessed against. The policies are unlikely to have any discernable effect on a number of the objectives, including natural resources (3); air quality (5); waste (7); ownership and participation (17); creativity and innovation (14); safety and security (19) and equalities and diversity (20) and these were all scored as 'neutral'.</p> <p>The main concerns identified are:</p> <p><b>The 'diversion' of funds towards Crossrail from areas which typically receive funding.</b> S.106 funding provides funding for a range of areas and is a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. Examples of the types of S.106 contributions could be public art, cycle paths, affordable housing, education and CCTV. If funds are 'diverted' towards Crossrail these areas may as a result of receiving less funding be affected. However, there is a high degree of uncertainty related to this assumption. S.106 agreements are made through negotiation, discussion and agreement between the developer and the Council on a case by case basis. Furthermore, the Jones Lang LaSalle report (4.6) states that in their opinion <i>'there is likely to be less impact on the existing level of S106 receipts collected by Central London Boroughs if the charge is low, predictable and is signalled well in advance.... as in these circumstances it is more likely that the cost can be absorbed within a "normal" development appraisal'</i>. In consequence, it is not anticipated that the diversion of funds will be significant and no negative effects have been identified. However, there remains a degree of uncertainty about the short term effects, while the market adjusts to the new tariffs, of the policies against a number of the IIA objectives. Over time as the market adjusts to the new tariff it is anticipated that there would be more certainty and less effects against the IIA objectives as the developers would be able to plan for the tariff much earlier in the development process, this is reflected by the score of neutral in the medium and long term.</p> <p><b>Making developments economic unfeasible:</b> Concerns have been expressed that in light of the current economic climate the additional funds required for Crossrail may tip the balance and make some development proposals economically unfeasible. This has the potential to result in significant negative effects, for example, if a major regeneration scheme was delayed or not taken forward. The Jones Lang LaSalle report states that <i>'all things considered, a low simple tariff .... should not materially deter development provided that it is signalled in advance and can be factored in as one of the cost of production'</i>. Furthermore, to avoid or reduce the risk that developments will not proceed where the contributions are prohibitively expensive each case will be considered on its merits and factors like the viability of a scheme will be taken into account when decisions about contributions are made. This was helpfully clarified following consultation with the London Assembly and the GLA Group Functional Bodies by adding reference in Policy 3C.12A to <i>'economic viability of the development concerned'</i> and <i>'impacts of different types of development in particular locations'</i>. However, reflecting the uncertainty expressed in the Jones Lang LaSalle report a precautionary score of uncertain was applied wherever it was felt there was a danger that viability could be influenced by the tariff.</p> <p><b>Spatial extent of developments:</b> The tariffs charged on office space (under the SPG) may potentially result in changes to the amounts of office space being proposed in Central London. This could manifest through either smaller developments falling below the trigger threshold or by developers looking to build office and mixed use developments outside of the central area. However, this situation is less likely to happen if the charge is low, predictable and signalled well in advance.</p>						
- -	-	+	++	0	~	?
Major Negative Impact	Minor Negative Impact	Minor Positive Impact	Major Positive Impact	Neutral	No Relationship	Uncertain

## CIL: Impact Assessment

The impacts of CIL are identified in a report by the CLG (2008) *Community Infrastructure Levy Impact assessment*. It states that CIL *'offers a simpler, fairer, more transparent and predictable way of funding local*

*infrastructure...which will also speed up the development process by providing greater certainty for developers’.*  
A summary of the impacts on sustainable development, health, equality and human rights are identified in Box 3.2.

### **Box 3.2 Impacts Assessment of CIL (as identified in a report prepared by CLG)**

#### **Sustainable Development, Carbon Assessment, Other Environment**

*We do not anticipate that CIL will have an adverse impact on sustainable development, carbon emissions or other environmental matters. It could be argued that growth and increased development has a negative impact on the environment and increases levels of carbon emissions. However, CIL presents significant opportunities to offset this. As a tool to help local authorities create more accessible and sustainable communities, CIL could encourage more sustainable patterns of travel; for instance development could result in shorter journeys to work, which could be undertaken on foot or cycle rather than by car. Similarly, by providing additional resource for infrastructure, CIL could lead to better provision of public transport, and so reduce the need for private modes of transport. Also CIL monies could be used to support flood defences, as well as open spaces which enhance the local environment.*

#### **Health Impact Assessment**

*It is not anticipated that this proposal will have an adverse impact on health. We are of the view that CIL can benefit the health of residents by providing additional resources for authorities to deliver the infrastructure and services required to create sustainable communities. For instance, CIL monies might support local medical facilities, or open spaces and playgrounds, all of which enhance the health and well-being of communities.*

#### **Race, Disability, Gender and Other Equality**

*We do not think that CIL will have an adverse impact on any social group. By making communities more sustainable, CIL will facilitate economic growth and liveability and so create opportunity for all. The infrastructure and services that CIL will provide (such as medical facilities and transport networks) will enhance accessibility and liveability for all sectors of society.*

#### **Human rights**

*This proposal will not have an adverse impact on human rights.*

Source: CLG (2008) *Community Infrastructure Levy Impact assessment*

### **Compatibility with the adopted London Plan**

An important consideration in the appraisal of the Crossrail alterations to the London Plan is how the new and amended policies will interact with the existing policies. The two new and two amended policies are in two sections of the report. This section of the IIA discusses the compatibility of the changes to the London Plan with the rest of the London Plan.

The first new policy sits within the thematic policies chapter within the Connecting London section and is directly related to Objective 5 ‘to improve London’s accessibility’. The introduction of Policy 3C.12A is in keeping with the Policy 3C.11 and all of Section 3C in that it looks to improve travel in London through the funding of Crossrail. In reviewing the London plan the inclusion of the Policy 3C.12A ‘Funding Crossrail’ was found to be compatible with the rest of the London Plan and was generally unrelated to many of the other policies, other than 6A.4 and 6A.5 which have been amended.

The remaining three policies deal with the inclusion of Crossrail within planning obligations, including S106 agreements and the new CIL. These are included within Chapter 6 of the London Plan. Policy 6A.4 and 6A.5 have been amended to include Crossrail as a priority in planning obligations. Policy 6A.5A provides the basis for the Mayor to provide the boroughs and other partners in the application of the CIL, including for Crossrail. It is not anticipated that these policies will affect any of the other policies; they are either compatible or unrelated to them.

## **Cumulative effects**

The details of CIL are still being developed by Government and it is therefore difficult to identify and describe the cumulative effects of both CIL and S.106 agreements. One possibility is that the CIL will replace S.106 agreements for key infrastructure funding. If this were the case there would be no ‘doubling-up’ of payments towards infrastructure projects (minimising any negative cumulative effects).

The recently published London Thames Gateway Development Corporation (LTGDC) document Planning Obligations Community Benefit Strategy (2008) sets out a framework for developments within the London Thames Gateway area to contribute to infrastructure in the area. It is important for those areas where there are stations within the jurisdiction of this plan that there is clear guidance for developers so that they know how much and for what they will be expected to contribute with regards to the *Crossrail Alterations to the London Plan*.

## **Conclusions**

The policy alterations have been assessed against a range of sustainability objectives (the IIA Objectives) in order to identify their sustainability strengths and weaknesses. The approach to preparing this IIA Report follows the advice and guidance provided by the ODPM and has been prepared to meet the requirements of the SEA Directive and associated regulations.

The main concerns raised through scoping are identified under the questions below:

**1. Will investment be diverted from other funding needs towards Crossrail?** S106s agreements are made following negotiation between the developer and the Local Authority on a case by case basis. It is for this reason that it cannot be definitively stated that the policy alterations will not result in funds being diverted. However, the Jones Lang LaSalle report (see 4.6) states that in their opinion ‘*there is likely to be less impact on the existing level of S106 receipts collected by Central London Boroughs if the charge is low, predictable and is signalled well in advance... as in these circumstances it is more likely that the cost can be absorbed within a “normal” development appraisal*’. In consequence, it is not anticipated that the diversion of funds will be significant and result in any negative effects against the IIA Objectives; although uncertainties remain in the short term. However, given that this is uncertain TfL and the GLA are encouraged to monitor the situation.

**2. Will developers avoid location where investment is sought, change the type of development being proposed or abandon proposals due to economically viability?** In light of the current economic climate the additional funds required for Crossrail may be viewed as being prohibitively expensive and tip the balance so that the development proposals become economically unfeasible. If this situation occurred then the policy alterations would clearly have the potential to result in negative effects, for example, if a major regeneration scheme was delayed or not taken forward. However, the Jones Lang LaSalle report states that ‘*all things considered, a low simple tariff .... should not materially deter development provided that it is signalled in advance and can be factored in as one of the cost of production*’. Furthermore, to avoid or reduce the risk that developments do not proceed where the contributions

are prohibitively expensive each case will be considered on its merits and factors like the viability of a scheme will be taken into account when decisions about contributions are made. This was helpfully clarified following consultation with the London Assembly and the GLA Group Functional Bodies by adding reference in Policy 3C.12A to ‘economic viability of the development concerned’ and ‘impacts of different types of development in particular locations’.

Overall, the effects of the London Plan alterations against the IIA objectives are largely neutral and uncertain. These effects are predicted based on the assumptions identified in this report. Given the uncertainty the need and importance of monitoring becomes more apparent, as discussed in Section 4.1.

### **Monitoring**

It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the alterations will be monitored. However, as ODPM Guidance<sup>23</sup> (ODPM, 2005) notes *it is not necessary to monitor everything, or monitor an effect indefinitely. Instead monitoring needs to be focused on significant sustainability effects*’.

Monitoring the policy alterations for sustainability effects can help to answer questions such as:

- Were the assessment’s predictions of sustainability effects accurate?
- Are the alterations contributing to the achievement of desired IIA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

It is not necessary to monitor everything or monitor an effect indefinitely. Instead monitoring should be focussed on:

- Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Significant effects where there was uncertainty in the IIA and where monitoring would enable preventative or mitigation measures to be undertaken.

The Jones Lang LaSalle report recommended that:

*‘TfL and the GLA monitor the application of any new charging regime on a regular basis with a view to reviewing the level of Charges applied, and their geographical coverage which may be through an alteration to any proposed Supplementary Planning Document. A review might be triggered by significant variation in the level of receipts secured due to changes in the forecast level or type of development completions*’.

The report added:

*‘The introduction of CIL may also mean a formal review of the approach to securing develop contributions for Crossrail will need to be taken*’.

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<sup>23</sup> *Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, September 2005).

Measures concerning monitoring will be confirmed in a statement which will be made available after the final policies are adopted. However, it should be noted that the need for monitoring is reinforced by the SPG (Paragraph 4.22). The SPG includes further detail of the monitoring and review process.

**Quality Assurance**

The ODPM SA Guidance contains a Quality Assurance checklist to help ensure that the requirements of the SEA Directive are met. Those relevant to this stage have been highlighted.

## Appendix A Quality Assurance

Quality Assurance Checklist	
<b>Objectives and Context</b>	
The plan's purpose and objectives are made clear.	Section 2.2
Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	International and EC objectives and targets are identified in Section 3.3 (Table 3.1) and Appendix C. Sustainability issues are identified in Section 3.4 (Table 3.2).
IJA objectives are clearly set out and linked to indicators and targets where appropriate.	Section 3.5 (Table 3.3) lists the IJA objectives and appraisal criteria.
Links with other related plans, programmes and policies are identified and explained.	Section 3.3 identifies these documents and Appendix C reviews them. This list updates the plans and programmes identified in the Scoping Report (December 2008).
<b>Scoping</b>	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the IJA Report.	A pre-scoping meeting was held on the 28th August which all the environmental consultation bodies were invited. A further workshop took place during the 5 week consultation period on this Scoping Report (in January 2009). This IJA Report will go out for consultation alongside the draft policies for public consultation.
The appraisal focuses on significant issues.	Significant sustainability issues have been identified in this Scoping Report which should assist in focussing on the significant issues in the appraisal.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	These are made clear throughout the report where appropriate (see also Section 3.6.1 and 3.6.2).
Reasons are given for eliminating issues from further consideration.	These are made clear throughout the IJA Report where appropriate (see also Section 0).
<b>Baseline Information</b>	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	See Section 3 and Appendix E.
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	See Section 3 and Appendix E.
Difficulties such as deficiencies in information or methods are explained.	These are made clear throughout the Report where appropriate (see also Section 3.6.1 and 3.6.2).
<b>Prediction and evaluation of likely significant effects</b>	

<b>Quality Assurance Checklist</b>	
<ul style="list-style-type: none"> <li>Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.</li> </ul>	Section 3.6 presents the assessment of the performance of the preferred option. This is set out in Table 3.5.
<ul style="list-style-type: none"> <li>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</li> <li>Likely secondary, cumulative and synergistic effects are identified where practicable.</li> </ul>	<p>Positive and negative effects are considered within the assessment set out in Table 3.5. Potential impacts are identified in the short, medium and long-term.</p> <p>Likely secondary, cumulative and synergistic effects are identified in the assessment commentary, where appropriate. This is summarised in Section 0.</p>
<ul style="list-style-type: none"> <li>Inter-relationships between effects are considered where practicable.</li> </ul>	Inter-relationships between effects are identified in the assessment commentary, where appropriate.
<ul style="list-style-type: none"> <li>Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.</li> </ul>	These are identified in the commentary, where appropriate.
<ul style="list-style-type: none"> <li>Methods used to evaluate the effects are described.</li> </ul>	These are described in Section 3.6.
<b>Mitigation measures</b>	
<ul style="list-style-type: none"> <li>Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.</li> </ul>	These are identified in the commentary, and within the key conclusions and recommendations (Section 4).
<ul style="list-style-type: none"> <li>Issues to be taken into account in development consents are identified.</li> </ul>	These are identified in the commentary, and within the key conclusions and recommendations (Section 4).
<b>The SA Report</b>	
<ul style="list-style-type: none"> <li>Is clear and concise in its layout and presentation.</li> </ul>	The IIA Report is clear and concise.
<ul style="list-style-type: none"> <li>Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate.</li> </ul>	The report avoids the use of technical terms where appropriate and aims to present the information in a clear language.
<ul style="list-style-type: none"> <li>Explains the methodology used. Explains who was consulted and what methods of consultation were used.</li> </ul>	Section 3 presents the methodology used for the IIA and Section 1.3 explains the consultation.
<ul style="list-style-type: none"> <li>Identifies sources of information, including expert judgement and matters of opinion.</li> </ul>	Information is referenced throughout the report.
<ul style="list-style-type: none"> <li>Contains a non-technical summary</li> </ul>	Included.
<b>Consultation</b>	
<ul style="list-style-type: none"> <li>The IIA is consulted on as an integral part of the plan-making process.</li> </ul>	This report is being consulted upon at the same time as the draft alterations.
<ul style="list-style-type: none"> <li>The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and IIA Report.</li> </ul>	This report is being consulted upon at the same time as the draft alterations.
<b>Decision-making and information on the decision</b>	

## Quality Assurance Checklist

<ul style="list-style-type: none"><li>• The IIA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.</li></ul>	See Appendix D. Further changes will be undertaken should the consultation process suggest that this is necessary.
<ul style="list-style-type: none"><li>▪ An explanation is given of how they have been taken into account.</li></ul>	See Appendix D. Further changes will be undertaken should the consultation process suggest that this is necessary.
<ul style="list-style-type: none"><li>• Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.</li></ul>	Will be identified in the post-adoptions statement, following the adoption of the policies.

## Appendix B

# Habitats Regulations Assessment – Screening Assessment

### Overview

European Sites are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under *Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora* and Special Protection Areas (SPA) designated under *Council Directive 79/409/EEC on the Conservation of Wild Birds*.

Under Part IVA of the *Conservation (Natural Habitats, &c.) Regulations 1994 as amended* the Greater London Assembly (GLA) must determine if the Spatial Development Strategy for London (also known as the London Plan) is likely to have a significant effect on a European Site in Great Britain or a European offshore marine site, either alone, or in combination with other plans and projects. If significant effects are anticipated, then an Appropriate Assessment of the implications for the site in views of its conservation objectives must be undertaken.

The purpose of this technical note is to determine whether the Crossrail Funding Alterations are likely to have significant effects upon the European Site(s) identified (alone or in combination) and to provide a professional opinion as to whether the Habitats Regulations Assessment needs to proceed to Appropriate Assessment.

### Potentially Affected European Sites

Previous work for the London Plan has identified the European Sites that could potentially be directly or indirectly affected by its implementation.<sup>24</sup>

The following European Sites fall within or adjacent to the boundaries of the London Plan and thus may be directly affected by its implementation:

- Lee Valley SPA (and Ramsar site);
- Epping Forest SAC;
- Richmond Park SAC;
- Wimbledon Common SAC;
- South West London Waterbodies SPA (and Ramsar site).

The following European Sites are situated within a 10km of the area covered by the London Plan and so have also been given further consideration as they may be indirectly affected by its implementation:

- Wormley-Hoddesdonpark Woods SAC;

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<sup>24</sup> Forum for the Future (2006) Appropriate Assessment, Screening Report “Draft Further Alterations to the Local Plan”

- Burnham Beeches SAC;
- Windsor Forest and Great Park SAC;
- Thames Basin Heaths SPA;
- Mole Gate to Reigate Escapement SAC;
- North Downs Woodland SAC;
- Thames Estuary and Marshes SPA (and Ramsar site).

Based on previous work for the London Plan,<sup>25</sup> further details of the Conservation Objectives, condition and vulnerabilities of these European Sites are provided in Table B.1.

**Table B.1 Interest Features, Conservation Objectives, Condition and Vulnerability**

European Site	Conservation Objectives	Condition Status (July 2006) and Reasons if Unfavourable	Vulnerabilities
Lee Valley SPA (and Ramsar site)	To maintain in favourable condition the habitats for the populations of bittern (an Annex I species) and populations of migratory bird species of European importance (gadwall and shoveler) with particular reference to open water and surrounding marginal habitats.	The SPA comprises a number of SSSIs of which Walthamstow Reservoirs, Waltham Abbey and Turnford and Chestnut Pits are in 100% favourable condition.  Walthamstow Marshes is 36% favourable and 63% unfavourable but recovering.	A significant increase in recreational pressure could impact upon wintering wildfowl numbers.
Epping Forest SAC	To maintain in favourable condition: <ul style="list-style-type: none"> <li>▪ Atlantic <i>acidophilous</i> beech forests with <i>ilex</i> and sometimes <i>taxus</i> in the shrub layer for which this is considered to be one of the best areas in the UK.</li> <li>▪ European dry heaths and North Atlantic wet heaths with <i>Erica tetralix</i>.</li> <li>▪ Habitats for the population of stag beetle, for which this is one of only four known localities in the UK.</li> </ul>	30% favourable condition. 34% unfavourable recovering. 26% unfavourable no change. 10% unfavourable declining.	Declining epiphytic bryophyte population – although the reintroduction of pollarding and wood pasture management is helping to reverse this decline.  Existing air pollution which is contributing to the poor condition of parts of the site.  Potential for recreational pressure to impact on heathland parts of the SAC.
Richmond Park SAC	To maintain in favourable condition the habitats for the population of stag beetle, for which this is one of only four known localities in the UK.	6% favourable condition. 8% unfavourable recovering. 86% unfavourable no change.	High levels of recreational pressure due to the location of the park within an urban area.

<sup>25</sup> Forum for the Future (2006) Appropriate Assessment, Screening Report “Draft Further Alterations to the Local Plan”

European Site	Conservation Objectives	Condition Status (July 2006) and Reasons if Unfavourable	Vulnerabilities
Wimbledon Common SAC	To maintain in favourable condition the European dry heath and Northern Atlantic wet heath with <i>Erica tetralix</i> , for which the area is considered to support a significant presence.  To maintain in favourable condition the habitats for the population of stag beetle, for which this is one of only four known outstanding localities in the UK.	40% favourable condition.  59% unfavourable but recovering.	High levels of recreational pressure due to the location of the park within an urban area, which can result in damage to the sensitive heathland areas.  Air pollution is also thought to be having an impact on the quality of the heathland habitat.
South West London Waterbodies SPA (and Ramsar site)	To maintain in favourable condition the habitats for the populations of migratory birds species of European importance (gadwall and shoveler) with particular reference to open water and surrounding marginal habitats.	The site comprises six SSSIs of which the majority are in 100% favourable condition. The exceptions being Wraysbury No. 1 gravel pit, which is 100% unfavourable and declining; and Staines Moor, which is 73% favourable and 25% unfavourable but recovering.	Wraysbury gravel pits suffer from high levels of disturbance from recreational activities.  Potential for other parts of the site to be adversely affected by increased recreational pressure.
Wormley-Hoddesdonpark Woods SAC	To maintain in favourable condition the <i>Stellario-Carpinetum</i> , oak hornbeam woodland. The site is one of only two known outstanding localities in the UK.	The SAC comprises two SSSIs:  Wormley-Hoddesdonpark South, of which 75% is in favourable condition and 22% is unfavourable but recovering.  Wormley-Hoddesdonpark North, of which 99% is in favourable condition.	The majority of the wood is a NNR and is managed sympathetically with no direct threat.  There is some informal recreational pressure but this is concentrated on well established paths.
Burnham Beeches SAC	To maintain in favourable condition:  Atlantic <i>acidophilous</i> beech forests with <i>ilex</i> and <i>taxus</i> rich in epiphytes, considered to be one best areas in the UK.	100% favourable condition.	Dust and hydrological changes associated with adjacent mineral workings.  Much of the site is an NNR and is managed sympathetically.
Windsor Forest and Great Park SAC	To maintain in favourable condition:  <ul style="list-style-type: none"> <li>▪ Atlantic <i>acidophilous</i> beech forests with <i>ilex</i> and sometimes <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>illicit-Fagenion</i>).</li> <li>▪ Old <i>acidophilous</i> oak woods with <i>Quercus robur</i> on sandy plains, for which this is one of only four known outstanding localities in the UK.</li> </ul> To maintain in favourable condition the habitats for the population of Violet click beetle, for which this site is one of only three known outstanding localities in the UK.	43% favourable condition.  57% unfavourable but recovering.	The large population of ancient trees combined with the historical continuity of woodland cover has resulted in Windsor Forest being listed as the most important site in the UK for fauna associated with decaying timber or ancient trees. Management for the invertebrate interest is being undertaken by Natural England and the Crown Estate.

European Site	Conservation Objectives	Condition Status (July 2006) and Reasons if Unfavourable	Vulnerabilities
Thames Basin Heaths SPA	To maintain in favourable condition the habitats for the populations of Nightjar and Woodlark (Annex I bird species of European importance) with particular reference to lowland heath.	This SPA covers a wide area and includes a number of SSSIs. These include:  Cobham Common, of which 65% is unfavourable but recovering; 15% is favourable; and 15% is unfavourable and declining.  Horsell Common, of which 40% is favourable; 39% is unfavourable recovering; and 12% is unfavourable no change.  Ockham and Wisley Commons, of which 81% is unfavourable but recovering; 17% is unfavourable no change; and 2% is unfavourable and declining.	The mosaic of habitats which forms the internationally important lowland heathland is dependant on active heathland management. Therefore, a lack of traditional management can pose a threat.  The threat of development pressure, particularly housing, on neighbouring land, which can result in increased recreational use of the sensitive heathlands.
Mole Gate to Reigate Escapement SAC	To maintain in favourable condition: <ul style="list-style-type: none"> <li>▪ <i>Taxus baccata</i> woods of the British Isles for which this is considered to be one of the best areas in the UK.</li> <li>▪ Stable Xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes for which this is the only known outstanding locality in the UK.</li> <li>▪ European dry heaths for which the area is considered to support a significant presence.</li> <li>▪ Semi-natural dry grassland and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) for which this is considered to be one of the best areas in the UK.</li> </ul> <p>To maintain in favourable condition the habitats for the population of:</p> <ul style="list-style-type: none"> <li>▪ Great crested newt</li> <li>▪ Bechstein's bat</li> </ul>	33% favourable 64% unfavourable but recovering 3% unfavourable, no change	Recreational pressure is high and requires management.  Majority of the site owned/run by conservation minded organisations but some areas are under private ownership and these are at threat from neglect and lack of appropriate grazing.

European Site	Conservation Objectives	Condition Status (July 2006) and Reasons if Unfavourable	Vulnerabilities
North Downs Woodlands SAC	<p>The maintain in favourable condition:</p> <ul style="list-style-type: none"> <li>▪ <i>Asperulo-Fagetum</i> beech forest, for which this is considered to be one of the best areas in the UK.</li> <li>▪ Semi-natural dry grassland and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) for which the area is considered to support a significant presence.</li> <li>▪ <i>Taxus baccata</i> woods of the British Isles for which this is considered to be one of the best areas in the UK.</li> </ul>	<p>This SAC includes the following SSSIs:</p> <p>Shorne and Ashenbank Woods: 100% unfavourable but recovering</p> <p>Great Crabbles Wood: 100% unfavourable, no change</p> <p>Cobham Woods: 81% unfavourable, no change; 17% unfavourable but recovering; 2% favourable.</p> <p>Halling to Trottscliffe Escarpment: 76% favourable; 4% unfavourable by recovering; 14% unfavourable, no change; 7% unfavourable, declining.</p>	<p>Yew woodland is managed with minimum intervention.</p> <p>Beech woodland is managed as High Forest with active encouragement of beech regeneration.</p> <p>Chalk grassland requires continuous grazing which is not achieved on various parts of the site.</p>
Thames Estuary and Marshes SPA (and Ramsar site)	<p>To maintain in favourable condition the habitats for the populations of Annex I birds species of European importance (avocet and hen harrier) with particular reference to intertidal mudflats, intertidal saltmarsh, intertidal shingle, grazing marsh, saline lagoons and flooded chalk pits.</p> <p>To maintain in favourable condition the habitats for the populations of migratory species of European importance (ringed plover, grey plover, dunlin, redknot, black-tailed godwit and common redshank) with particular reference to intertidal mudflats.</p> <p>To maintain in favourable condition the habitats which support the waterfowl which contribute to the wintering waterfowl assemblage of European importance.</p>	<p>This SPA covers a wide area and includes a number of SSSIs. These include:</p> <p>Mucking Flats and Marshes (condition status unknown<sup>26</sup>)</p> <p>South Thames Estuary and Marshes: 87% favourable; 10% unfavourable but recovering</p>	<p>Dredging, erosion, flood management, eutrophication and general human disturbance adversely affect the site's ecological character.</p>

<sup>26</sup> Forum for the Future (2006) Appropriate Assessment, Screening Report "Draft Further Alterations to the Local Plan".

## Screening Assessment and Methodology

The alterations have been screened with respect to their potential to have significant effects upon the European Sites identified in Section 2.

The potential for the alterations to result in likely significant effects has been coded according to the “traffic light” system shown in Table B.2. Those alterations that will result in no significant effects are coded green; those for which significant effects can easily be avoided by giving consideration to mitigation and alternative solutions are coded amber; and those that should be discounted outright in their current form unless the Imperative Reasons of Overriding Interest (IROPI) test can be passed are coded red.

The screening assessment is based on the key principles resulting in the worst-case scenario in line with the precautionary approach required for undertaking Habitats Regulation Assessment.

**Table B.2 System adopted for denoting potential significant effects on European Sites**

Colour Warning	Requirement
Green	The alteration is considered unlikely to have a significant effect on a European Site OR The alteration contains sufficient measures to ensure that it will not result in any impact on the integrity of a European Site either alone or acting in combination.
Amber	The alteration is considered likely to have a significant effect on a European Site AND In its current form the alteration <u>might</u> result in an impact on the integrity of a European Site either alone or acting in combination. Further consideration therefore needs to be given to mitigation measures or alternative solutions so as to ensure that it will not result in any impact on the integrity of a European Site either alone or acting in combination.
Red	The alteration is considered likely to have a significant effect on a European Site AND In its current form the alteration <u>will</u> result in an impact on the integrity of a European Site either alone or acting in combination and should be deleted unless there is an argument for IROPI and no alternative solutions exist.

## **Results of the Screening Assessment**

This assessment was originally undertaken in June/July 2008 and revised in October/November 2008.

### **Policy 3C.11 - New Cross-London Rail Links [in the July 2008 draft]**

Entec made recommendations relating to this policy alteration (referred to as Policy 3C.11 – New Cross-London Rail Links). However, this policy is no longer being amended and therefore the recommendations are no longer applicable.

### **Policy 3C.12A - Funding of Crossrail**

This new policy alteration relates to obtaining contributions for funding Crossrail through the use of planning obligations at Local Development Framework level. For planning applications of strategic importance the existence and content of planning obligations supporting the funding of Crossrail will become a material consideration.

**Since Policy 3C.12A only seeks to obtain funding for the implementation of Crossrail this alteration is unlikely to have a significant effect on a European Site.**

### **Policy 6A.4 Priorities in Planning Obligations**

This amendment to an existing policy states that guidance on the use of planning obligations at Local Development Framework level will be provided. It will be a requirement to give planning obligations relating to public transport and affordable housing highest importance. For planning applications of strategic importance the existence and content of planning obligations will become a material consideration.

**Since Policy 6A.4 only relates to the use of planning obligations implementation of the alteration is unlikely to have a significant effect on a European Site.**

### **Policy 6A.5 Planning Obligations**

This amendment to an existing policy states that guidance on the use of planning obligations at Local Development Framework level will be provided. This will require developers to make a fair and reasonable contribution to the full cost of meeting the infrastructure made necessary by their development. Systems will also be developed to pool contributions from planning obligations for the delivery of the priorities set out in the London Plan.

**Since Policy 6A.5 only relates to the use of planning obligations implementation of the alteration is unlikely to have a significant effect on a European Site.**

### **Policy 6A.5A Community Infrastructure Levy**

This new policy alteration states that guidance on the use of the Community Infrastructure Levy at Local Development Framework level will be provided. This will require developers to make a contribution to providing the infrastructure to support delivery of the London Plan.

**Since Policy 6A.5A relates to the use of the Community Infrastructure Levy implementation of the alteration is unlikely to have a significant effect on a European Site.**

#### **Conclusions**

The following alterations are unlikely to have a significant effect on a European Site.

- 3C.12A Funding of Crossrail;
- 6A.4 Priorities in Planning Obligations;

- 6A.5 Planning Obligations;
- 6A.5A Community Infrastructure Levy.

Policy 3C.11 is no longer being amended.

## Appendix C Additional Plans, Programmes and Strategies

**Table C.1 Additional Plans, Programmes and Strategies Review**

Plan, Programme or Strategy	Objectives	Implications for the SA
<p>The Planning Act 2008</p> <p>Mayor of London (2008) The London Climate Change Adaptation Strategy.</p> <p>CGL (2008)The Community Infrastructure Levy</p> <p>Crossrail Act 2008</p> <p>Draft River Basin Management Plan Thames River Basin District (2008)</p> <p>UK Climate Change Act 2008</p>	<p>To speed up the planning process for major infrastructure projects such as energy, aviation, road and rail transport, water and waste.</p> <p>Identifies the key risks to London and Londoners poised by climate change. The Strategy then prioritises the actions which need to be undertaken in mitigating those risks.</p> <p>The Community Infrastructure Levy (CIL), the provisions for which are currently going through Parliament, will be a new charge which local authorities in England and Wales will be empowered, but not required, to charge on most types of new development in their area. CIL charges will be based on simple formulae which relate the size of the charge to the size and character of the development paying it. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area</p> <p>The Crossrail Act is designed to secure the powers necessary to build Crossrail.</p> <p>The plan sets out a set of actions with the aim of achieving the following benefits:</p> <ul style="list-style-type: none"> <li>- Cleaner sources for drinking water, bathing, communities and economic uses</li> <li>- Wiser sustainable use of water;</li> <li>- better habitats for wildlife that live in an around the water;</li> <li>- Protect and enhance our native wildlife; and</li> <li>- Protect the natural landscape, promoting the value of recreation.</li> </ul> <p>The UK has passed legislation which introduces the world's first long term legally binding framework to tackle the dangers of climate change.</p>	<p>As the Planning Act 2008 will deal with future planning applications it is not anticipated that it will impact the SA.</p> <p>Climate change and London's response to it has the potential to have large effects on the economy of the region. Changes to the economy of the region could effect development and therefore indirectly affect the level of developer contributions. Adaptation to climate change will also place some financial constraints on development.</p> <p>Part of the alterations to the London Plan will look at integrating the CIL into the London Plan and will lead to the Mayor providing guidance for the boroughs and other partners setting out a clear framework of the application of the CIL.</p> <p>Although the Act and the London Plan alterations have the same purpose the Bill is concerned with the building and the paper with securing funding. It is not anticipated that the Bill will impact on the SA.</p> <p>Major investment is planned for both sewage and treatment works, improve ground water quality, restore some of the historic properties of the river and enhance ecology within the RBM area. The funding of some of these goals will come from a number of sources. It is not clear how much of this will be obtained through planning obligations and S.106 agreements.</p> <p>Climate change has the potential to affect London dramatically. The importance of tackling climate change and preserving London will be an important factor in ensuring new development within London is viable.</p>

Plan, Programme or Strategy	Objectives	Implications for the SA
Future of Water, the Government's Water Strategy for England (2008)	This document sets out how the government wants the water sector to look by 2030. This is an overarching vision which includes drinking water, rivers, canals, water supplies and sewages.	The quality of the water environment and industry in London is an important part of maintaining London as a hub. Part of maintaining this quality is arrived at through planning obligations. In addition the maintenance of a quality water environment adds to the attractiveness of London for new development.
Draft Heritage Protection Bill (2008)	This draft bill sets out the legislative framework for a unified and simpler heritage protection system that will be more accountable and transparent. The aim is to include more opportunities for public involvement in the understanding, preserving and maintaining our heritage.	The draft Bill includes details about the protection of existing heritage resources including the responsibilities of both the planning authority and developer into the protection of the resource. The Bill includes detail on the control of works and the prevention of damage to heritage structures.
GLA (2007) Evidence Base: Climate Change in the Further Alterations to the London Plan.	The evidence base for The London Climate Change Adaptation Strategy.	As for The London Climate Change Adaptation Strategy.
CLG (2007) Homes for the future, more affordable, more sustainable, CLG, London	<p>The housing green paper set out the Government's vision for everyone to have access to a decent home at a price they can afford in a place where they want to live and work. It presents proposals to work with the Government's partners to provide:</p> <ul style="list-style-type: none"> <li>- More homes;</li> <li>- Well designed, green homes linked to good schools transport and healthcare; and</li> <li>- More affordable homes to buy or rent.</li> </ul> <p>The green paper sets a target of constructing an additional 240,000 homes per year, and delivering some 2 million homes by 2016.</p> <p>In support of the growth of housing, the contribution to infrastructure projects will be doubled by 2010/11. This may come from the Community Infrastructure Fund (CIF) and private sector developer contributions.</p>	<p>The green paper also highlighted that the use of Planning-gain Support (PGS) may result in Section 106 planning obligations being scaled back, with 70% of PGS revenues going to the local authority to be used for infrastructure projects, particularly transport. The green paper highlights infrastructure funding, setting out the need for private sector developer contributions. It also presents the use of PGS in funding infrastructure improvements by local authorities, particular transport.</p> <p>The alterations regarding the funding of Crossrail should take into account this green paper in the Sustainability Appraisal.</p>
HM Government of Great Britain. Greater London Authority Act. 2007.	The <i>Greater London Authority Act</i> confers upon the Mayor of London new duties including the duty to reduce health inequalities. These duties apply to all GLA policies.	... with respect to health inequalities the GLA will be concerned to ensure that the amended policies reduce health inequalities.
Business Rate Supplement: A White Paper (2007)	The White Paper introduces a new power to local authorities in England, allowing them to raise and retain local supplements on the national business rate in order to fund projects which will promote economic development.	The Mayor intends to use the Business Rate Supplement to service the debt raised by the Mayor during the construction process. This will not have a direct effect on the SA but provides an overview of how an alternative funding stream is being used.
Planning Policy Statement: Planning and Climate Change Supplement to PPS1	To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies which deliver the goals of PPS1.	As for The London Climate Change Adaptation Strategy.

Plan, Programme or Strategy	Objectives	Implications for the SA
<p>Planning Policy Statement 25: Development and Flood Risk (2006).</p> <p>Planning Obligations Community Benefit Strategy (2006) London Thames Gateway Development Corporation.</p>	<p>Planning Policy Statement 25 (PPS25) sets out Government policy on development and flood risk. It's aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.</p> <p>The LTGDC has adopted a Planning Obligations Community Benefit Strategy. This is to ensure that developments contribute financially and in kind towards the infrastructure that is needed in the London Thames Gateway area to support the developments that are coming forward for planning approval. These proposals have been developed in consultation with the Thames Gateway Executive at Communities and Local Government Department (CLG). As such they are part of the Department's drive to look for and develop innovative funding mechanisms.</p>	<p>PPS25 aims to ensure that flood risk is taken into account at all stages of development. It includes direct reference to developer contributions and as such is an important consideration in this assessment.</p> <p>This document is for the LTGDC to help secure regeneration within the Thames Gateway. It provides a guide for the collection of developer contributions across the London Thames Gateway and as such has relevance to this assessment.</p>

## **Appendix D**

### **Summary of Workshop and Consultation Feedback**

Consultee (date received)	Response	Action / Comments
Environment Agency (21/01/09)	1. Some attempt should be made to assess the likely impacts, and potential cumulative effects, of the prioritisation of these two mechanisms for funding Crossrail.	See cumulative effects section (Section 0).
	2. The emphasis of the plan alterations on the use of CIL for Crossrail should therefore not divert funding away from other environmental and social infrastructure requirements.	Noted. This concern has been identified, described and assessed in Section 0.
	3. We agree with the questions set out in section 2.3 which should help ensure that the IIA identifies the potential impacts of the policy alterations. However, as highlighted at the workshop, an additional question should be included to determine whether the scale of development, as well as the location and type of development, may differ as a result of the contributions.	This question has been added in Section 0.
	4. Currently available information on the use of the CIL and how this may affect the use of Planning Obligations should be reviewed to ensure that the impacts of these two mechanisms can be accurately predicted and assessed.	A review or literature has been undertaken. However, there are few relevant documents on this subject.
	5. We recommend that the Community Infrastructure Impact Assessment that was published in December 2008 is also reviewed as it provides some more information on the potential implications of CIL.	Noted. This report has been reviewed and a summary of the report's findings are presented in Section 0.
	6. Baseline information should also be provided on the use of Planning Obligations by London Boroughs, particularly those within the Crossrail area of influence, including the London Thames Gateway Development Corporation (LTGDC).	Overview provided in Appendix E and considered in the cumulative effects section (3.9)
	7. The LTGDC Planning Obligations Community Benefit Strategy (March 2008) <a href="http://www.ltgdc.org.uk/planning_information/planning_obligations_community.a_spx">http://www.ltgdc.org.uk/planning_information/planning_obligations_community.a_spx</a> should be reviewed.	Overview provided in Appendix E
	8. Some key baseline information should be provided for each of the topic areas identified as potentially being affected by the plan alterations to ensure impacts can be accurately predicted and assessed (see comments under question 5 below on the scope of the assessment).	Appendix E contains historical information on Section 106 Agreements in London.
	9. One of the key opportunities provided by assessment at plan level is that cumulative effects can be identified and hopefully avoided or minimised. There is currently no mention of cumulative effects assessment in the IIA Scoping Report. This should be considered, for example, in looking at the potential interactions of the use of both Planning Obligations and the Community Infrastructure Levy to provide funding for Crossrail, as well as the cumulative effects with other contributions policies such as the LTGDC Planning Obligations Community Benefit Strategy (March 2008).	See cumulative effects section (Section 0).
	10. We are generally happy with the proposed IIA matrix in Table 3.5. However, section 3.6 of the IIA Scoping Report mentions 'trade-offs' between competing objectives. It is not clear exactly what this means but the assessment should clearly identify the impacts and these should not be 'cancelled out' i.e. by trading off a positive impact against a negative one.	Agree. Impacts are not 'cancelled out' or traded against one another.

Consultee (date received)	Response	Action / Comments
	<p>11. The IIA Scoping Report currently only considers two realistic alternatives i.e. business as usual and the proposed policy alterations. We do not consider therefore that a range of 'reasonable alternatives' have been considered. We acknowledge that alternative options will be restricted by the fact that the mechanisms and amount of funding for Crossrail are set out in legislation and we believe that the investigations carried out by Colin Buchanan and Jones Lang LaSalle have assessed other more detailed options relating to the level of funding and type of development that should be required to contribute. It is important that this information is clearly stated in section 2.4 of the report to justify the alternatives considered. Notwithstanding this, we feel that other alternatives should be considered within the policy alteration option. These should consider alternative options for the geographical scope of the contributions, and the type of development from which funding could be sought, as these criteria are likely to result in different impacts. Geographical scope, and development type, are currently considered in section 3.1.3 of the IIA Scoping Report, however, assessment of impacts should not just be restricted to this narrow option (even though it is the preferred option set out in the Supplementary Planning Guidance). We suggest that another option, for example, should be considered which looks at the geographical area to which Planning Obligations could realistically be applied based on the criteria set out under Section 106 of the Town and Country Planning Act 1990 (as amended).</p>	<p>Further information and analysis has been undertaken. See Section 0 (including reference to geographical scope, and types of development considered).</p>
	<p>12. Section 3.1.2 of the IIA Scoping Report states that 'at this stage no topics will be 'scoped out''. However, Table 3.2 effectively 'scopes out' various key sustainability issues by suggesting that the alterations are unlikely to have significant effects on them. In addition to those issues already identified in Table 3.2 as relevant, we believe that the following issues should be considered in the IIA as the alterations may have adverse impacts on them i.e. they should not be 'scoped out' at this stage: biodiversity, waste, water quality and resources and flood risk, which is covered as part of the appraisal criteria in Table 3.3 under the climate change objective, but not specifically mentioned in the table as an issue. All these issues may be affected by the alterations as emphasis on funding for Crossrail may result in a reduction in the amount of funding available for biodiversity, waste, water quality and resources and flood risk infrastructure.</p>	<p>Each of the policy alterations were considered against each of the IIA Objectives. No topics were scoped out.</p>
	<p>13. There is no mention of the Water Framework Directive in Table 3.2, this is a key issue that has arisen since the previous alterations to the London Plan were assessed. If funding is diverted away from provision of water services infrastructure then this could result in impacts. The alterations must not result in a deterioration of the status of waterbodies or prevent the attainment of the goal of 'good ecological status'. This issue should be included as part of the IIA objectives and appraisal criteria in Table 3.3.</p>	<p>Reference to the WFD has been added in Table 3.2 and 3.3.</p>
<p>Government Office for London (22/01/09)</p>	<p>14. We are grateful for the opportunity to comment on the approach being scoped for the Integrated Impact Assessment, IIA, at this early stage. Whilst we broadly support the approach taken in the scoping report, we do wish to raise specific issues which are outlined below.</p>	<p>Noted.</p>

Consultee (date received)	Response	Action / Comments
	<p>15. It is of fundamental importance that the Scoping Report makes absolutely clear the relationship between London Plan policy, and the parameters in Supplementary Planning Guidance (SPG). Paragraph 2.3 of the report explains that the IIA is being undertaken on the policy alterations, however, it goes on to say that the assessment is 'informed by' the draft Supplementary Planning Guidance, SPG. This is confusing to the reader. For example, paragraph 3.1.3 refers to the geographical area of the proposed assessment, which seems to be cover both Greater London and the area contained in SPG. You must as a reader be able to discern a clear separation of the assessment of the policies (London Plan) as opposed to an assessment of the parameters, geographic areas, type of development etc (SPG).</p>	<p>Noted. This distinction has now been clarified.</p>
	<p>16. As you know SPG does not require any form of assessment, nor examination in public, unlike the London Plan. The policies in the London Plan are deliberately general, being 'enabling policies', and most of the details are provided in SPG. This means that, to some extent, the 'effects' or 'impacts' of the policies depend on the details in SPG, and these can be reviewed at any time, without an IIA.</p>	<p>Agreed.</p>
	<p>17. In view of the above, we wish to make the following points:</p>	<p>-</p>
	<p>18. We suggest that the Scoping Report makes clear whether the IIA covers a) London Plan policy alterations only; or b) London Plan policy alteration and SPG. If the latter, then the Scoping Report should include as a proviso to explain that the parameters, such as geographic scope and types of development affected, could change if the SPG was to be revised.</p>	<p>Noted. This distinction has now been clarified.</p>
	<p>19. It would be helpful if the report, at the scoping stage, and the final report could clarify how any future review of the SPG would be handled from an IIA point of view.</p>	<p>Further information on this has been added. See Section 0 and 0.</p>
	<p>20. The report writers and GLA should make clear to the Panel (to be established) how the IIA and the SPG should be assessed at the examination of the London Plan alterations.</p>	<p>Clarified in this report.</p>
	<p>21. Table 3.2 J, Housing, states that the alterations are unlikely to have significant effects on housing. Are we confident there will be no impact on delivery of affordable housing? AH is still an equal priority in amended policy 6A.4 but the funding pot is not unlimited. Also, as referred to above, this is because SPG sets the charge for 'office development' only, however, this could change if SPG was reviewed.</p>	<p>The policy is not anticipated to significantly impact provision to AH (as this is safeguarded in Policy 6A.4).</p>
	<p>22. End of section 3.1.3 "As such developer contributions will only be sought for office developments within the Central Activities Zone and the Isle of Dogs." That's not quite right - see SPG para. 4.11 on some developments within 800m of a Crossrail station, outside the central London area (though at LPAs discretion).</p>	<p>Policy amendments have been taken into account in this IIA.</p>
	<p>23. The Community Infrastructure Levy, CIL, is to provide another £300m towards Crossrail. Although the details of the scheme are not yet known, it would be helpful if the Scoping Report clarified how CIL has been considered, including any limitations, as part of the IIA. It may well be an issue which is returned to at the full review of the London Plan.</p>	<p>Noted. Further information has now been included.</p>
<p>Natural England (21/01/09)</p>	<p>24. I have had a look at the scoping report and there are no comments that I wish to make. Natural England is happy with the approach been taken with regards to the Habitats regulations Assessment. We would concur with the conclusions reached and the justification behind them.</p>	<p>Noted.</p>

Consultee (date received)	Response	Action / Comments
English Heritage	25. Thank you for your letter of 10 December 2008 consulting English Heritage on the above document. English Heritage also appreciated having representation at the very useful consultation workshop on 8 January 2009.	Noted.
	26. English Heritage is the government's advisor on all matters relating to the historic environment and a statutory consultee in respect of the Strategic Environmental Assessment (SEA) of plans. We are keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the Local Development Framework process. Our document Conservation Principles: Policy and Guidance (2008) provides the basis for the following advice. It is consistent with Planning Policy Statement 1: Delivering Sustainable Development (2005), Planning Policy Guidance (PPG) 15: Planning and the Historic Environment (1994) and PPG 16 Planning and Archaeology (1990) and the explicit objective of 'protecting and enhancing the natural and historic environment'.	Noted.
	27. Key Issues - English Heritage is of the view that the historic environment does have relevance to the proposed alterations, contrary to the position taken in table 3.2 on page 14 of the Scoping Report. This relevance quickly becomes apparent when considering the questions on page 6 concerning the issues that the Integrated Impact Assessment (IIA) can cover. Our concerns in relation to these can be considered in terms of two headings: Investment Diversion and Altered Developments.	Noted.
	28. Investment Diversion - Planning obligations in relation to the historic environment are a valuable and widely used tool and very often the key way in which enhancement of these vital assets is achieved in terms of PPG 15. Kings Cross/St Pancras, Lincolns Inn Fields and Boundary Gardens in Tower Hamlets are just a few of the projects that have benefited from section 106 monies recently.	Noted. The scope of the IIA now includes these issues.
	29. Potential beneficiaries include heritage assets at risk from neglect, decay, under-use or redundancy or specifically any of a borough's entries on English Heritage's Heritage at Risk Register. In addition, where appropriate, types of historic environment planning obligation have included repair, restoration or maintenance of heritage assets and their setting, increased public access, improved signage to and from the heritage asset, interpretation panels/historical information, production and implementation of up-to-date Conservation Area management plans and appraisals, research to understand buried archaeological remains and sites (such as post-excavation costs) and public and school education. This list is by no means exhaustive but provides an indication of the type of planning obligations that are used.	Noted Included in Appendix E
	30. Furthermore, section 106 monies very often enable match funding for other grants and many of our Area Partnership Scheme Grants have operated alongside section 106 funds. Consequently, English Heritage considers that policy development that could reduce the pool of section 106 funds available has the potential to have a serious impact on the historic environment.	Noted Included in Appendix E
	31. Altered Developments - Related to the above point is a potential secondary, synergistic or cumulative impact that the policy alteration could have on the historic environment. This impact may occur as an operation of development economics in that if asked to provide a greater contribution under section 106, developers could seek more floor space in order to ensure that they accrue a particular level of profit. This could lead to bulkier schemes being put forward which could have myriad negative impacts on the historic environment of the locality in which they are to be situated. English Heritage therefore takes the view that the policy alterations should be assessed for their potential to induce this type of impact on the historic environment.	Noted. This issue was captured in the IIA.

Consultee (date received)	Response	Action / Comments
	<p>32. Geographical Remit - At the workshop of 8 January, it became apparent (when considering the two issues set out above) that such impacts, and assessment of them, could be very dependent upon the proposed geographical remit of the policy alterations. It seemed that should the policy be applied along the Crossrail route and to a very specifically defined range of exceptions, then the policy alterations could be assessed for their impact on historic environment resources in those areas. Alternatively, if the policy were to be applied across London, then similarly the impacts would need to be assessed across London as well. Discussions at the workshop also identified that a pan-London policy may not meet with the specificity requirements of Circular 05/05 Planning Obligations. English Heritage is of the view that this matter needs to be determined in order to effectively scope the requirements for assessment for the policy alteration. If the matter is decided in favour of constraining the policy alterations geographical remit to the Crossrail route, we request that a buffer zone along the route is also assessed in order to allow for potential displacement of development in order to avoid the policy's operation.</p>	<p>Noted the policies and SPG have been updated to provide a clearer steer with regard to the geographical remit.</p>
	<p>33. Implications for IIA - Baseline information will be required for the historic environment and English Heritage recommends compiling it from the following sources:</p> <ul style="list-style-type: none"> <li>- Greater London Sites and Monuments Record;</li> <li>- The Schedule of Buildings of Architectural and Historic Interest (listed buildings);</li> <li>- Borough conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance) and Areas of Local Importance (or equivalent);</li> <li>- Borough lists of Locally Listed Buildings (or equivalent);</li> <li>- The Register of Historic Parks and Gardens</li> <li>- The London Heritage at Risk Register;</li> <li>- The HELM website <a href="http://www.helm.org.uk">www.helm.org.uk</a>; and</li> <li>- The Heritage Counts website <a href="http://www.heritagecounts.org.uk">www.heritagecounts.org.uk</a>.</li> </ul>	<p>We do not feel that this baseline information is relevant to the appraisal of developer contributions; However, detailed baseline information was included in the IIA of the London Plan. This information has not been reproduced as part of this report. Should consultees require baseline information to read alongside this report this can be found online at <a href="http://www.london.gov.uk">www.london.gov.uk</a>.</p>
	<p>34. In respect of plans, programmes and policies that should be reviewed for the IIA in relation to the historic environment, English Heritage requests that the following are included:</p> <p>In addition, the potential issues for the historic environment outlined earlier suggest the need for some targeted baseline information concerning the use of section 106 monies in the affected boroughs and the predicted range of Crossrail's constituency.</p> <p>European Landscape Convention  PPG 15: Planning and the Historic Environment  PPG 17: Archaeology and Planning  Conservation Principles: Policies and Guidance</p>	<p>The review of plans and programmes outlined in Section 3.3.</p>

Consultee (date received)	Response	Action / Comments
	35. Finally, English Heritage would strongly advise that the affected local authorities' conservation staff are consulted throughout the preparation and implementation of the IIA, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment in their particular localities.	The Scoping Report was issued to the statutory consultees. The IIA report will be issued
	36. Conclusion - Thank you for the opportunity to provide comments on the Crossrail Alterations IIA Scoping Report. It must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the IIA, and which may have adverse effects on the environment. I trust that you will find this information of value to your process.	Noted.

## Appendix E Historical Information on Section 106 Agreements in London

Nationally Section 106 Agreements yield an estimated £2.5 billion annually<sup>27</sup>. Benefits to Londoners, through contributions from developers that have planning permission, are thought to be worth between £100 million and £200 million a year. Table E1 estimates cash payments received as S106 contributions in London in 2006-07. The research was undertaken by BURA on behalf of the London Assembly in December 2007.

**Table E1: London's S106 Contributions**

Local Authority	S.106 cash received
City of London Brent Greenwich Islington Southwark Tower Hamlets Westminster	Between 8,000,001 and 34,350,802 (incl.)
Barking & Dagenham Barnet Camden Hammersmith and Fulham Hackney Haringey Hillingdon Hounslow Lewisham Redbridge	Between 4,500,001 and 8,000,000 (incl.)
Ealing Harrow Lambeth Merton Newham Richmond upon Thames	Between 2,808,559 and 4,500,000 (incl.)
Bromley Croydon Havering Sutton Waltham Forest Wandsworth Kensington and Chelsea Kingston upon Thames	Between 154,929 and 2,808,557 (incl.)

Source: 'Capital Gains?' A report by BURA for the London Assembly, December 2007.

The same research identified the following areas of expenditure in London:

- Transport and access improvements (29% of S106 expenditure)

<sup>27</sup> [www.publications.parliament.uk/pa/cm200506/cmselect/cmodpm/1024/1024we32.htm](http://www.publications.parliament.uk/pa/cm200506/cmselect/cmodpm/1024/1024we32.htm)

- Public realm, including streetscape and open space (24%)
- Education and health (21%)
- Affordable housing (14%)
- Economic and community regeneration (12%)

Contributions towards transport improvements are the largest recipient of S106 monies at 29%. To illustrate more detailed types of S106 contributions in London, the following table has been taken from the London Borough of Westminster's Annual Monitoring Report (2007-08).

**Table E2. Westminster Financial Planning Obligations 2007-08**

Type of Contribution	Contributions received by the Council (£)	Contributions forming part of signed agreements (£)
Affordable housing	9,234,183	17,415,064
CCTV / street guardians	35,000	816,480
Community benefits	271,186	2,160,000
Cycle paths	2,450	18,950
Education, training & employment	507,201	2,198,703
Code of construction		170,000
Highway works/ environmental improvements/ footways	1,078,364	4,299,432
Open space/ trees/ greening	147,751	172,000
Parking space shortfall mitigation	96,929	424,500
Paddington Area Transport Study	50,000	1,050,000
Public art	207,450	1,851,000
Public transport	20,000	20,000
<b>Total</b>	<b>£11,650,514</b>	<b>£30,596,129</b>

## Use of S106 monies for heritage resources

English Heritage note that the potential beneficiaries (of S106) include heritage assets at risk from neglect, decay, under-use or redundancy or specifically any of a borough's entries on English Heritage's Heritage at Risk Register. In addition, where appropriate, types of historic environment planning obligation have included repair, restoration or maintenance of heritage assets and their setting, increased public access, improved signage to and from the heritage asset, interpretation panels/historical information, production and implementation of up-to-date Conservation Area management plans and appraisals, research to understand buried archaeological remains and sites (such as post-excavation costs) and public and school education.

Furthermore, section 106 monies very often enable match funding for other grants and many of our Area Partnership Scheme Grants have operated alongside section 106 funds. Consequently, English Heritage considers that policy development that could reduce the pool of section 106 funds available has the potential to have a serious impact on the historic environment.



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