

Annex B

London Sub Regions

Central London Integrated Impact Assessment

A1.1 *INTRODUCTION*

This paper contains the findings of an Integrated Impact Assessment (IIA) of the Sub Regional Development Framework (SRDF) for Central London. It is based on initial appraisal of a Working Draft of the SRDF issued in February 2005 and on a more detailed appraisal of the draft SRDF published in July 2005.

The findings are preliminary since they are based on a preliminary appraisal framework and on a working draft of the SRDF. A further cycle of appraisal will be carried out on the draft of the SRDF which will be sent out for consultation.

A1.2 *OVERALL FINDINGS OF THE IIA*

The current draft SRDF for Central London reflects the spirit and content of SRDF's and the priority issues for the sub-regional as outlined in the London Plan. It sets out very clearly the key economic and demographic concerns for the sub-region in meeting objectives for the development of land for housing and business. It also includes a clear analysis of the roles assigned to the hierarchy of town centres in the sub-region and their current and projected functions and as such adheres to the polycentric model for the development of London. It also focuses, due to severe constraints on available or potential development areas, on a 'denser' more 'compact' urban fabric.

At this stage in its development, it is the view of the appraisal team that this SRDF does not 'presented an integrated view of the future of the sub-region'. Now does it, as a consequence, provided a clear vision or direction for the sub-region as a whole. It is recognised that this integrated view may emerge more clearly as a result of inputs from stakeholders during the consultation process. Specific issues we would raise include:

- It is not clear what a successful SRDF would look like.
- an imbalance between the treatment of issues of relevance to the CAZ and the remainder of the sub-region. At present much of the text seems to focus on 'the West End' and the 'City Fringe'. A large percentage of the sub-region, including many of the areas of greatest economic disadvantage are not dealt with in any depth. A balance between the CAZ and the 'local' attributes of the sub-region is not achieved. Throughout the text Central London appears to refer to a zone of London rather than the sub-region.
- Part 2 of the SRDF presents detailed information on a range of key development and infrastructure issues. The use of relevant, quantified, data is very helpful. However, data on communities is

very limited and section 3 and 4 of the SRDF contain very limited evidence of for the issues discussed.

- There is the potential to included sub-regionally specific indicators as a result of consultation. This would improve the SRDF in terms of relevance and also measurability of impact.
- the 'people' aspects of the sub-region are only dealt with in very limited ways. The people issues associated with the current development model for the sub-region are not evident. Neither the 'new' demographics associated with planned growth or the characteristics of the existing population are explore in any detail.
- the SRDF, in its present form, offers little in the way of new ideas on the roles or current aspirations of major and district centres in the sub-regions.
- the approach/methodology adopted seems over reliant on technocratic/top down analysis. It also seems to avoid dealing with political differences between boroughs and the effect this has and is likely to continue to have on patterns of development. The 'Wandsworth Effect' would be a good example of this.
- issues of resource efficiency, quality of design, liveability and quality of life are poorly developed in the current draft – they are usually referred to in quite vague, qualitative terms.
- links to other SRDF's such as South London are not well developed at present, nor are the links to the spatial strategies of other regions, notably the East of England and the South East explored in any depth. Given the interdependency and sometime conflicting strategies we suggest that this will need to be addressed in further drafts of this SRDF.

This assessment recognises that SRDF's occupy a difficult position between the London Plan and LDF's. However, it is felt that a closer link needs to be made between the challenges facing the sub-region, many of which would appear to cross local authority boundaries, than has been achieved in the consultation draft of this SRDF.

The SRDF recognises, in several places, that infrastructure provision, especially of transport, but also of other services should be provided in tandem with development. It is also implicitly raises issues over the likely deliverability of future schemes. This will affect the overall sustainability of what is achieved. If it is possible within the aims and objectives prescribed for SRDF's, it would add considerably to the power of the framework if it were to contain scenarios that factored in what is known about schemes and projects and what this may mean to the model of development being advocated.

The incorporation of policies and principles from the London Plan whilst on the one hand helpful in terms of structure and overall coherence and direction of the framework is, on the other, given the lack of an assessment of how they relate to this particular sub-region, a factor in the 'business as usual' feel of this SRDF.

The approach taken to provided details on the Opportunity Areas and Areas of Intensification leads to them appearing to be quite similar in terms of opportunities and constraints.

This SRDF does mention the need for behavioural change in terms of transport use, water consumption and waste management although only in the first case is this very detailed.

The significance of behavioural change to the overall future sustainability of London in terms of its ecological footprint need to be discussed at greater length in all of the SRDFs.

The issues of climate change, CO₂ emissions and the low carbon economy, all of significant relevant to London, are mentioned by action/strategy is largely left to the boroughs.

Evidence on 'people' issues is not generally included in the SRDF and the characterisation of health inequalities, social, economic and environmental exclusion and how these issues will be addresses is weak.

In addition, beyond a brief mention, equality target groups do not receive attention in the document.

In terms of process - related issues, the SRDF is clear on how stakeholders have contributed to the development of the framework and on the ongoing processes for working with stakeholders and the programme for consultation on the SRDF. As indicated above, the consultation process offers stakeholder more sub-regionally specific and to provide it with focused performance and monitoring indicators which are currently lacking. In also allows stakeholders the opportunity to review the large number of actions currently proposed in the Framework.

A1.3

THE APPRAISAL PROCESS

The appraisal to date has focused on the 'direction' of development proposed in the SRDF since it does not contain (and indeed is probably not intended in many cases to contain) sufficiently precise locational development detail for a more detailed assessment of the likely impacts of the SRDF.

The appraisal framework focuses on the extent to which the SRDF reflects, in a fashion appropriate to a sub-regional spatial planning document, the LSDC's Sustainable Development Framework for London and the Objectives of the London Plan. The appraisal has used a series of appraisal questions based on the LSDC framework and additional inputs form a range of London Stakeholder to "interrogate" the SRDF. The appraisal has not addressed specific concerning stakeholder issues the sub-region at this stage.

Table 1 below sets out the results of the initial appraisal. To help with the interpretation of findings, symbols have been used to summarise the main thrust of the appraisal, as follows:

- ✓ Overall impact influence likely to be positive
- ? Overall impact influence unclear
- ✘ Overall impact influence likely to be negative
- ✘✘ Clear, strong negative impacts
- Neutral

Table.1 Initial Appraisal of the Central London SRDF

Key:

✓	= positive impact/influence
-	= neutral
?	= unclear impact/influence
X	= negative impact

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating Central London	Comments
1	Overall Objective		
1.1	<p>We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the achievement of integrated environmental, economic and social development equally, minimising trade offs? (eg place SD as an overall objective of the framework and integrate it firmly in the vision for the sub regions development) • involve transparent processes in cases where trade-offs between competing objectives have been necessary? (eg does the document clearly indicate/document the trade-off processes involved in the development of the framework?) 	x/?	<p>The SRDF reiterates policy SB1 of the London Plan in terms of the strategic priorities for Central London. The SRDF also says that this is about delivering ‘sustainable growth’ – this is defined in the Framework.</p> <p>The issue of trade-offs is not addressed in the SRDF.</p>
1.2	<p>Key Issue – Deprivation</p> <p>To What extent does the framework:</p> <ul style="list-style-type: none"> • address economic, health, social and environmental issues in areas of acute deprivation? (eg focus on areas suffering from acute deprivation in reference to indicators such as IMD rankings) • identify areas of deprivation within the sub-region or within communities of interest • involve people from areas of acute deprivation? (eg from areas suffering from acute deprivation in reference to indicators such as IMD rankings) 	x/?	<p>Whilst deprived communities are mentioned in the SRDF very little information is provided on term or their relationships to the growth model proposed for the sub-region. Proposed Action 3A says that ‘In their Community Strategies, boroughs are invited to consider the linkages between areas of deprivation and access to labour markets and work with parties to identify a package of measures to improve the situation: No further evidence/objectives/targets are provided.</p> <p>Use of IMD data is poor throughout the SRDF.</p> <p>The SRDF also notes in relation to Opportunity Areas and Areas for</p>

<p>1.3</p>	<p>Key Issue – Social Exclusion To what extent does the framework:</p> <ul style="list-style-type: none"> involve other people with expertise in deprivation issues? E.g. community welfare groups, social services teams, education, health and livelihoods experts. promote social cohesion across the sub-region eg. Encourage cross-community working on planning and development issues, create facilities that serve the need of more than one grouping, foster the integration of marginalized groups into society. address economic, social and environmental issues affecting individuals and communities within the sub-region suffering social exclusion? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, the homeless, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> involve individuals and communities suffering social exclusion in developing/ commenting on the framework? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> <p>involve other people with expertise in social exclusion issues? i.e. groups and individuals within the sub-region working</p>	<p>X</p>	<p>Intensification that ‘They are adjacent to local communities that should be enabled to gain from development and especially access new jobs within the Areas’.</p> <p>Overall the links between deprivation and the proposed growth strategy are unclear.</p> <p>The issue of provision of affordable housing is but delivery of targets remains with the boroughs. The implication of non-delivery of the desired levels of housing is not addressed.</p> <p>Whilst there is discussion of the need to provide affordable housing for key workers and other who will work in the region- it is not clear how current problems and issues such as immigration, refugees and asylum seekers will be addressed in terms of housing needs.</p> <p>Environmental exclusion is only really addressed by the statistics on accessibility to greenspace and to a lesser extent the discussion on air quality and quality of design.</p> <p>The issue of social exclusion within the sub-region is not addressed in any detail of the SRDF. The ‘people aspects of development have not been presented in terms of how the development path presented in the SRDF will reduce social exclusion and/or promote more integration.</p> <p>The SRDF does state that the community and voluntary sectors will be targets for consultation on the Framework. This may enhance the ‘people’ aspects of the document.</p> <p>Whilst the equality target groups are named in the documentation this is as far as it goes.</p>
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	with or representing excluded groups, minority groups etc, also experts/research bodies working on social exclusion in London.		
2	<i>Ensuring Effective Implementation</i>		
2.1	<p>Objectives, responsibility, targets, indicators. To what extent does the framework:</p> <ul style="list-style-type: none"> • establish clear and fully integrated economic, social and environmental objectives? • Contain explicit information on long, medium and short term targets/goals. • specify responsibility for delivery of those objectives? • contain targets on those objectives? • include indicators to monitor progress towards those objectives/targets? 	✓/?	<p>The SRDF contains a series of targets relating to housing and other forms of spatial development relevant to the sub-region. These are largely from the London Plan. It also contains sporadic examples of trends from research on London and targets from national policies and legislation as they relate to the sub-region (e.g. education/ schools).</p> <p>At present the SRDF does not contain a detailed Implementation Plan or a set of monitoring and evaluation criteria specific to the sub-region. However, it seems likely that harmonisation of monitoring across the 5 SRDFs and in accordance with the London Plan will be implemented. There is also scope for sub-regionally specific indicators which could be very important in measuring the impact of the Framework. With the exception of Air Quality, no reference is made to environmental standards.</p>
3	<i>Taking Responsibility</i>		
3.1	<p><i>Responsibility: As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability. To what extent does the framework:</i></p> <ul style="list-style-type: none"> • account for and minimise the negative, and maximise the positive, impacts of proposals on people in the rest of the UK and beyond? (<i>eg explicitly consider potential impacts of the framework outside of the sub-region (regional, national and international)</i>) • constitute best practice when compared to other approaches taken around the world? (<i>eg compare to for example Sustainable Seattle, work on the Sydney Olympics, information from the European Sustainable Cities website</i>) • make use of the best information available? (<i>eg review coverage of the Evidence Base and indicate where gaps exist and how these may be addressed for the future. Particular issues may relate to information on environmental conditions/performance, likely demographic trends, the effects of</i> 	✓/?	<p>The SRDF makes reference to the other SRDF's and the need to ensure compatibilities between them. It also contains a number of specific references to common development areas, spatial continuities and common issues especially with the East SRDF and, albeit to a much smaller extent, the South London SRDF.</p> <p>In some cases opportunities to develop transboundary themes/connect with other SRDF's are not taken up in the current draft of the Central London SRDF e.g. the development of the Wandle Valley. Also links to common sub-regional key issues such as retail provision, office space etc have not been made. In general links to the East are well presented, links to the West, North and South are not even where centres with the sub region have important functional links to the other centres.</p> <p>Links to the adjacent regions and their spatial strategies are made but are very underdeveloped given the close relationships that exist on many key topics and the interdependence of the strategies.</p> <p>The present draft does not contain any assessment of the likely impact of</p>

	<p><i>climate change, changes in technology and distribution of income etc)</i></p> <ul style="list-style-type: none"> include an assessment of the wider impact of the framework, of implementation involving wider stakeholders, and of likely links to the rest of London and the UK 		<p>the SRDF on adjacent SRDF's or on adjacent regions.</p> <p>There is no evidence to suggest that experience from outside London or from abroad has influenced the development of the SRDF with the exception of a single report on Barcelona whose relevance to the SRDF is unclear from the current draft.</p> <p>It is not clear to what extent data from partners in the sub-region has been used/will be integrated in the future. At present there is a strong reliance on evidence drawn from London-wide studies. It is to be hoped that as a result of consultation on the draft SRDF more sub-regionally specific data will be used to inform all areas of the SRDF.</p> <p>There is no evidence in the present draft of the SRDF as to what extent alternative development scenarios have been considered this may reflect the spatial constraints within the sub-region.</p>
3.2	<p><i>Capability:</i> All of us – individuals, households, businesses, local and regional government, voluntary groups – will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable. To what extent does the framework:</p> <ul style="list-style-type: none"> promote access to information, knowledge and support for all groups - individuals, households, organisations, government etc? ensure proper provision of information on the Framework itself? Include a clear information strategy that includes all groups and communities in the sub-region? Address the information needs of people outside the sub-region. 	x/?	<p>The current draft of the Central London is specific about the dates/periods of consultation. It is not clear, however, what the broader information and communication strategy for the framework is.</p> <p>It is specifically mentioned that the community and voluntary sectors will be involved in the consultation.</p>
3.3	<p><i>Creativity:</i> We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective. To what extent does the framework:</p> <ul style="list-style-type: none"> establish mechanisms to promote effective decision-making? set out a longer term perspective appropriate to the 	✓	<p>The SRDF does contain very clear information, on the strategy that the sub-region is intending to pursue in spatial terms. It is of concern, however, that much of the language used is technical and not necessarily readily accessible to many people in the sub-region.</p> <p>There does not appear to be a sub-regional or external information strategy.</p> <p>The SRDF takes a long-term perspective in terms of planning, housing and infrastructure issues. It does not, in general, however, use predicted trends for social and environmental issues as part of its analysis of the sustainable development path for the sub-region.</p> <p>The SRDF has clear links to the London Plan and its long-term aspirations for London and more tenuous links to other Mayoral strategies.</p>

	<p>issue being addressed, to ensure future prosperity and quality of life?</p> <ul style="list-style-type: none"> • involve new and creative ways to promote effective decision-making? • involve clear links between the long-term perspective and other long-term visions, documents, strategies etc? (eg the London Plan and other Strategies) • <p>3.4 <i>Ownership:</i> We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote civic participation, ownership and responsibility in the sub-region and more broadly in London through the involvement of different stakeholders in implementation of the Framework? • involve a diverse range of stakeholders? 	✓	<p>The SRDF is quite clear on the need for stakeholder inputs and ownership of the SRDF as well as the value of stakeholder inputs to date. It is not clear from the current draft how diverse a range of stakeholders has been consulted to date. The current period of consultation should enrich the Framework.</p> <p>It would be useful for the SRDF to contain a list of stakeholders who have been involved in the development of the document.</p>
4 Developing Respect			
4.1	<p><i>Respect:</i> Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London’s diversity as its key strength. The right of all London’s citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others. Does the framework:</p> <ul style="list-style-type: none"> • promote a culture of tolerance, fairness and respect for people and the environment taking into account key strengths and needs within the sub-region? • recognise diversity as a key strength? • Recognise the way which the framework may impact differently on differently groups within the sub-region. 	x/?	<p>The SRDF does refer to the diversity of communities resident in the sub-region and to the opportunities that this presents e.g. for tourism-related development. However, it does not really develop diversity as one of the sub-regional key strengths nor does it address the differential impacts (if any) of the SRDF on different groups within the sub-region.</p>
4.2	<p><i>Safety:</i> Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote safety and reduce the threat and fear of crime? • Promote the creation of safer communities 	✓	<p>The issue of safety and safe design is mentioned as a key issue affecting people’s perceptions of areas of the sub-region such as some of its parks and open spaces as well as parts of the West End and other locations in the sub-region. Safety is also mentioned as an issue in mixed-use developments.</p>

4.3	<p><i>Vibrancy:</i> Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the vibrancy and creativity of the sub-region and its communities • involve transparent and participatory processes to resolve conflicts? (eg citizens’ panels, Planning for Real exercises, involvement of Local Strategic Partnerships etc) • provide local communities with opportunities to make inputs on issues that will increase their sense of place/positive feeling about the sub-region. 	?/✓	<p>Quality of life is a sub-text within the SRDF but is not really analysed in any detail nor is any measure of satisfaction with the current quality of life in the sub-region used (data from the LA’s could be presented).</p> <p>A number of unsupported statements are made about the quality of the public realm and certain aspects of the environment, especially in the CAZ. Evidence should be provided to support these statements. These issues should also be analysed for non-CAZ areas of the sub-region.</p> <p>Section 2.142 of the SRDF state the ‘The ability of the sub-region’s town centres to improve their image and attractiveness will be a key to accommodating sustainable growth’.</p> <p>Vibrancy is recognised as an essential part of the sub-region’s USP but is not really developed into a development theme. The issues of vibrancy outside the CAZ is not really addressed at all.</p> <p>The role of participatory planning processes is not addressed in the SRDF – they may not apply – but it would be useful if the framework promoted the use of such processes and the value of transparency as part of the development of LDF’s.</p>
5 Managing resources			
5.1	<p><i>Environment:</i> We will protect and improve the city’s natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links. Does the framework:</p> <ul style="list-style-type: none"> • protect and improve the natural and built environment? • support the objectives and implementation of the Mayor’s environmental Strategies? • consider the state of the environment in the sub-region and priorities for environmental improvement? • 	?/✓	<p>Section 4 of the SRDF provided a succinct overview of environmental issues in the sub-region. Very limited use is made of the available evidence base. Some environmental priorities within the sub-region are mentioned especially air quality.</p> <p>The current draft does not make very strong links to the Mayor’s environmental strategies.</p>
5.2	<p><i>Resources:</i> We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste. Does the framework:</p>	?/✓	<p>Resource efficiency and it’s benefits are addressed in detail in the current draft of the SRDF. It could be integrated into the SRDF as an essential part of the efficient design of new developments and as an essential part of delivering sustainable growth.</p>

	<ul style="list-style-type: none"> • Promote energy efficient buildings • promote the minimisation of pollution and the clean up of polluted areas in the sub-region • promote the most prudent and efficient use of resources? • support the objectives and implementation of the Mayor’s Waste Strategy? 		<p>The SRDF does note (Section 2.109) that ‘it is imperative that he region strengthens its performance on waste minimisation and maximises its waste management provision’. The need to manage water consumption in also mentioned.</p> <p>Energy use, CO₂ emissions are mentioned but no clear actions of a specific nature, nor any new targets are proposed.</p> <p>Quantity of design is mentioned</p> <p>The issues of contamination of PDL and possible impacts on development areas are not explored.</p> <p>The practical implementation aspects of the Mayor’s Waste Strategy are not addressed by the framework. The opportunities provided by the Environmental Goods and Services sector, recognised as having important growth potential for London are not explored in the context of the Central Sub-region.</p>
6	Getting results		
6.1	<p><i>Progress:</i> We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards. Does the framework:</p> <ul style="list-style-type: none"> • promote local development that delivers wider economic, social and environmental objectives? • Promote development that addresses the employment and training needs of communities with the highest unemployment/ lack of skills in the sub region • promote development that builds the potential for future/long-term prosperity and quality of life via the policies and location of decisions it promotes? • Promote a balanced mix of housing and employment development in the sub-region that reflects the needs of all communities/groups 	x/?	<p>At present the analysis of local development in the SRDF is patchy since the document focuses to a significant extent on the CAZ. The Development Areas and Areas of Intensification require further detail to demonstrate that they are demand-based and that they correspond to local as well as London-wide needs.</p> <p>Wider development objectives are only developed to a very limited extent in the current draft of the SRDF – especially in the case of social and environmental objectives.</p> <p>Section 3 of the SRDF does note that ‘In the Community Strategies, boroughs may wish to examine the possibility of focusing more training resources in areas of deprivation’</p> <p>However, in general skills and training needs are not addressed in a constant or clear fashion in the SRDF – sections such as tourism receiving consideration whilst others receive no attention at all.</p> <p>The type/style of development to be focused on is described in very general ways.</p>

6.2	<p><i>Innovation:</i> All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.</p> <ul style="list-style-type: none"> • promote investment and innovation as integral parts of balanced development of the sub-region? • Prevent the loss of indigenous businesses 	✘	<p>Whilst the issue of affordable housing is addressed in the SRDF it is not clear how excluded groups will benefit from new/mixed development proposals in the sub-region. The needs of local communities and groups need to be more clearly presented and analysed this should not simply be left to the LDF's.</p> <p>The issue of innovation and its role in the development of the sub-region is not addressed in the current draft of the SRDF.</p> <p>The SRDF does not address the issue of indigenous businesses or their role in the current and proposed sub-regional economy. This needs to be taken up in the ongoing development of the SRDF</p>
6.3	<p><i>Esteem:</i> All forms of work will be recognised and valued. Paid employment will be plentiful.</p> <ul style="list-style-type: none"> • promote employment for all? • recognise and value unpaid work? • involve the voluntary/community sector? • engage with the unpaid sector (eg the unemployed, young people etc)? 	✓/?	<p>The current draft of the SRDF does not address the role of categories of employment such as social enterprises and does not mention unpaid work, the role of the voluntary sector etc.</p> <p>Whilst it does address likely levels of employment during the reference period of the SRDF the issue of employment levels within disadvantaged areas of the sub-region is not tackled. The analysis of employment is largely dominated by the CAZ, once again other areas within the sub-region are not analysed in detail.</p>
6.4	<p><i>Access:</i> We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities. Does the framework:</p> <ul style="list-style-type: none"> • promote policies that address the provision of accessible facilities/local key services (including health services and childcare), food, green space, cultural/sporting/ • leisure activities, and other amenities? • address sub-regional priorities to provide access for all to good housing • promote the development of mixed use developments which ensure good access to the above services and amenities? • promote public transport • Involve communities/local residents in development 	✓/?	<p>Access is recognised as a major aspect of the delivery of the framework at least in terms of transport. Access to infrastructure social, economic, environmental etc is mentioned but the evidence base is not used to any great degree and actions are generally vague. This should be addressed.</p> <p>In terms of access to infrastructure (both social and physical) the SRDF contains a large amount of evidence both on current status and on likely future developments/trends.</p> <p>The SRDF clearly recognises the interdependence between a viable development model and sustained or improved access to public transport.</p> <p>The framework also presents data on access to open/greenspace which is useful (as far as it goes) although the implications of this are not discussed.</p> <p>In terms of leisure/cultural facilities – the inclusion of the CAZ in the sub-region skews the analysis.</p>

	<p>of the framework</p> <ul style="list-style-type: none"> • Involve communities/local residents in the implementation of the framework 		<p>The issues of access to amenities, to healthy lifestyles etc is not addressed by the SRDF.</p> <p>The issue of health - except for infrastructure is largely ignored-no evidence is provided as to the health issues affecting the sub-region nor are the social departments of health explored in any depth.</p> <p>Access in terms of people's access to the SRDF process and documentation is well presented in terms of 'Institutional Stakeholders'. It is not clear how the SRDF process or documents will be made accessible to local communities - this needs to be addressed in future drafts of the framework.</p>
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East London Integrated Impact Assessment

A2.1

INTRODUCTION

This paper contains the findings of the Integrated Impact Assessment (IIA) of the Draft of the East London SRDF (dated May 2005).

An initial phase of assessment was carried out on the Consultation Draft of the SRDF earlier this year. The findings of that assessment were discussed with the authors of the SRDF. These initial findings have been reviewed and updated during the assessment of the Draft SRDF and incorporate comments on the appraisal received from the GLA.

A2.2

OVERALL FINDINGS OF THE IIA

The Draft SRDF for East London contains a clearly structured assessment of the issues affecting the sub-region in terms of its opportunities and constraints in both spatial and economic terms. In this it reflects the London Plan and the planning and economic development priorities for the sub-region. It presents the key priorities and development needs of the sub-region in a very accessible fashion and also contains clear sets of key actions for discussion/implementation at later stages in the implementation of the SRDF's and development of the local authorities LDF's, Community Strategies, etc.

The Framework sets out in a series of clearly structured chapters the opportunities and the challenges facing the sub-region, in particular in terms of delivering on targets for the provision of housing, employment and transport and the potential roles of the different urban centres within the sub-region's urban hierarchy. The principles for the allocation of growth are quite clearly set out.

A number of 'Opportunity Areas' and 'Intensification Areas' are identified in the SRDF. Each of these areas is provided with a 'data sheet' setting out key issues and opportunities and these are very helpful. However, for some issues the information is currently lacking or it is unclear what the status is, i.e., water supply and water treatment infrastructure capacity/condition for many of the areas.

The issue of transport infrastructure, congestion, levels of use of public transport and maintaining or improving current levels of access to public transport are all covered in some detail in the Framework. The issue of transport as a key determinant of sustainable development and sustainable communities in the sub-region is presented in a very clear way. The timing of infrastructure provision and upgrading and the effectiveness of demand management measures and access to all modes of transport are clearly of fundamental importance not only to the deliverability of the Framework but to the quality of life and quality of development of the sub-region.

In general, the “people issues” affecting the sub-region are not as well covered as the infrastructure issues. This is particularly true as far as deprivation, social exclusion and the existing status of key social determinants is concerned.

The use of the available evidence base both in terms of existing conditions and projected trends for the future is very variable and does not appear to have a clear rationale. Many statements are made for which it would be useful to have some supporting evidence or at least a reference to where evidence can be found.

Whilst the identity of the sub-region comes across quite well in many sections of the document, various boroughs within the region are not clearly presented in terms of the spatial opportunities they offer or their contribution to the sub-region. In general, more attention appears to be paid to the inner rather than the outer boroughs.

Overall, the framework recognises that levels of private transport use are likely to rise, as are waste arisings, air pollution and water consumption. Against these factors can be offset improved accessibility to services, better designed and constructed developments and regeneration, improved provision and accessibility of green space and improvements in some of the key determinants of health.

It is clear that the sustainability of development in East London is a challenge both in terms of existing conditions and the quality of new development. The scale of change that will be required to deliver above “business as usual” is significant and this is not always clear from the SRDF. One of the key challenges, recognised by the Framework in relation to transport, is to provide social and economic infrastructure in parallel to housing and commercial development.

A2.3

KEY FINDINGS

- The East London SRDF provides a clear picture of the sub-region and the key issues it needs to address in terms of spatial planning.
- Description of key planning and transport infrastructure issues is good.
- As with other SRDF’s, the lack of a clear and specific monitoring and evaluation framework for the SRDF is a weakness in the view of the appraisal.
 - The use of evidence within the SRDF is patchy and many issues and proposed actions would be easier to understand if evidence of “need” was presented.
 - The Framework is, to some extent, based on the need for significant behavioural change, especially relating to the use of transport if it is to be sustainable – this raises significant questions.
 - The ‘Proposed Actions’ are extremely useful in setting out where policies and actions need to be developed and implemented.

- The SRDF is weak in terms of its presentation of the evidence base regarding health and deprivation issues in the sub-region and the link between these issues and growth and development (para.189 of the SRDF) is not clearly made. However, the actions listed in section 3B of the SRDF clearly require local authorities and other partners to address this agenda.
- Diversity is clearly important to the identity and the future of the sub-region, this does not come out clearly in the Framework or in the discussion of Opportunity Areas, etc.
- The discussion of the urban hierarchy does not create a clear impression of the current status and potential role of centres within the hierarchy.
- The SRDF makes clear links to what is happening in the sub-region to other sub-regions and adjacent regions, whose economies, populations and transport links will have an impact on the development of East London, e.g., Thames Gateway.
- The predicted increase in waste arisings for the sub-region seems very high and looks unsustainable. This is not a direct impact of the SRDF but needs to be seen in the context of the current waste situation in London. The SRDF does recognise the need to integrate waste management requirements into developments.

Waste management is recognised as a key area of environmental management for London and policies and strategies to increase the efficiency of waste management and reduce waste arisings are in place and/or planned. These policies combined with behavioural change and action by Central Government should help to reduce projected increases in waste.

- The lack of a sub-regional Economic Development Strategy as an input to the SRDF weakens the robustness of the Framework's analysis of where and how the sub-region's growth will occur and what this means for the local economy and local communities .
- The Framework would greatly benefit from an executive or non-technical summary. It would also benefit from a discrete section which sets out the key characteristics of the sub-region. Part One does not really fulfil this role.

It is not clear how the framework relates to other plans and strategies. This could be resolved by including a diagram setting out these relationships in the Introduction.

In general, the language of the document is technical and jargon-laden, this does not help the non-expert reader in many instances.

A2.4

THE APPRAISAL PROCESS

The appraisal to date has focused on the 'direction' of development proposed in the SRDF since it does not contain (and indeed is probably not intended in

many cases to contain) sufficiently precise locational development detail for a more detailed assessment of the likely impacts of the SRDF.

The appraisal framework focuses on the extent to which the SRDF reflects, in a fashion appropriate to a sub-regional spatial planning document, the LSDC's Sustainable Development Framework for London and the Objectives of the London Plan. The appraisal has used a series of appraisal questions based on the LSDC framework and additional inputs from a range of London stakeholders to "interrogate" the SRDF.

The appraisal framework addresses issues both of "content" and "process".

Table 1 below sets out the results of the initial appraisal. To help with the interpretation of findings, symbols have been used to summarise the main thrust of the appraisal, as follows:

✓✓	Clear, strong positive impacts
✓	Overall impact influence likely to be positive
?	Overall impact influence unclear
X	Overall impact influence likely to be negative
XX	Clear, strong negative impacts
0	Neutral

Table.1 Initial Appraisal of the East London SRDF

Key:

✓✓	= Clear, strong positive impacts
✓	= Overall impact influence likely to be positive
?	= Overall impact influence unclear
X	= Overall impact influence likely to be negative
XX	= Clear, strong negative impacts
0	= neutral

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating East London	Comments
1	Overall Objective		
1.1	<p>We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the achievement of integrated environmental, economic and social development equally, minimising trade offs? <i>(eg place SD as an overall objective of the framework and integrate it firmly in the vision for the sub regions development)</i> • involve transparent processes in cases where trade-offs between competing objectives have been necessary? <i>(eg does the document clearly indicate/document the trade-off processes involved in the development of the framework?)</i> 	?	<p>The SRDF does not contain a clear statement on sustainable development and its influence on the SRDF in terms of its development or implementation. Its statements on the sustainable future of the East are relatively vague.</p> <p>At a site level some of the issues that need to be addressed to bring about balanced development are brought out, e.g., for the Opportunity Areas.</p>
1.2	<p>Key Issue – Deprivation To What extent does the framework:</p> <ul style="list-style-type: none"> • address economic, health, social and environmental issues in areas of acute deprivation? <i>(eg focus on areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> • identify areas of deprivation within the sub-region or within communities of interest • involve people from areas of acute deprivation? <i>(eg from areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> 	X/?	<p>The SRDF is not as clear as others on the significance of deprivation as an issue – IMD ranking of wards – mapping of areas of deprivation is not included in the Framework. The Framework is therefore lacking in an evidence base on this issue which, given the health and social issues in the sub-region is unhelpful and contradicts para.189 of the SRDF in terms of the overall philosophy of development.</p> <p>Neither deprived areas nor deprived groups within the sub-region are very clearly identified in the SRDF. It is also unclear how such areas and groups have influenced the direction or content of the SRDF.</p>

1.3	<ul style="list-style-type: none"> involve other people with expertise in deprivation issues? E.g. community welfare groups, social services teams, education, health and livelihoods experts. <p>Key Issue – Social Exclusion</p> <p>To what extent does the framework:</p> <ul style="list-style-type: none"> promote social cohesion across the sub-region eg. Encourage cross-community working on planning and development issues, create facilities that serve the need of more than one grouping, foster the integration of marginalized groups into society. address economic, social and environmental issues affecting individuals and communities within the sub-region suffering social exclusion? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, the homeless, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> involve individuals and communities suffering social exclusion in developing/commenting on the framework? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> involve other people with expertise in social exclusion issues? i.e. groups and individuals within the sub-region working with or representing excluded groups, minority groups etc, also experts/research bodies working on social exclusion in London. 	?/X	<p>Section 3b of the SRDF does contain an extremely useful list of actions for local authorities and other partners relating to deprivation issues.</p> <p>The East SRDF contains very little information or analysis on social exclusion issues. Whilst it does indicate the need to recognise the needs of excluded groups this remains at a very generic level. It is not clear how such groups will benefit from the framework or the developments/ investments that it seeks to direct.</p> <p>In general, existing communities and their relationship to the developments that are the focus of the Framework is not an issue that is analysed in any detail. There is little sense of a “bottom up” dimension to development.</p> <p>Section 3b of the SRDF does contain an extremely useful list of actions for local authorities and other partners relating to deprivation and social exclusion issues.</p>
2			
2.1	<p>Objectives, responsibility, targets, indicators. To what extent does the framework:</p> <ul style="list-style-type: none"> establish clear and fully integrated economic, social and environmental objectives? Contain explicit information on long, medium and short term targets/goals. specify responsibility for delivery of those objectives? contain targets on those objectives? include indicators to monitor progress towards those objectives/targets? 	✓/?	<p>The East SRDF does not have a strong set of targets, indicators and objectives beyond those in the London Plan. This means that monitoring and evaluation the success of the SRDF will be difficult and that its impact may be difficult to quantify or report.</p>
3			
3.1	<p><i>Responsibility:</i> As citizens of a world city, we will be aware of</p>	✓/?	<p>In general the SRDF does not really address these issues identified by the</p>

	<p>the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability. To what extent does the framework:</p> <ul style="list-style-type: none"> • account for and minimise the negative, and maximise the positive, impacts of proposals on people in the rest of the UK and beyond? (<i>eg explicitly consider potential impacts of the framework outside of the sub-region (regional, national and international)</i>) • constitute best practice when compared to other approaches taken around the world? (<i>eg compare to for example Sustainable Seattle, work on the Sydney Olympics, information from the European Sustainable Cities website</i>) • make use of the best information available? (<i>eg review coverage of the Evidence Base and indicate where gaps exist and how these may be addressed for the future. Particular issues may relate to information on environmental conditions/performance, likely demographic trends, the effects of climate change, changes in technology and distribution of income etc</i>) • include an assessment of the wider impact of the framework, of implementation involving wider stakeholders, and of likely links to the rest of London and the UK 		<p>LSDC Framework. In addition, the evidence base is weak. No idea of the relative significance of the East of London 's ecological footprint is provided.</p> <p>The East SRDF is stronger, however, than the other SRDF's in terms of the way in which it addresses the need for the Framework to take on board other sub-regional and regional strategies and the views of stakeholders in adjoining areas and regions.</p>
3.2	<p><i>Capability:</i> All of us – individuals, households, businesses, local and regional government, voluntary groups – will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote access to information, knowledge and support for all groups - individuals, households, organisations, government etc? • ensure proper provision of information on the Framework itself? • Include a clear information strategy that includes all groups and communities in the sub-region? • Address the information needs of people outside the sub-region. 	?	<p>The significance of information and of access to information is not discussed or addressed by this SRDF. It is lacking an information strategy.</p> <p>No details are provided as to how the Framework will be made available to communities in the sub-region. Stakeholders outside the region are mentioned but it is not clear how they will be engaged with.</p>
3.3	<p><i>Creativity:</i> We will seek new and creative ways to overcome</p>	✓/?	<p>The SRDF does mention longer timescales in line with the London Plan.</p>

3.4	<p>the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective. To what extent does the framework:</p> <ul style="list-style-type: none"> • establish mechanisms to promote effective decision-making? • set out a longer term perspective appropriate to the issue being addressed, to ensure future prosperity and quality of life? • involve new and creative ways to promote effective decision-making? • involve clear links between the long-term perspective and other long-term visions, documents, strategies etc? (<i>eg the London Plan and other Strategies</i>) <p><i>Ownership:</i> We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote civic participation, ownership and responsibility in the sub-region and more broadly in London through the involvement of different stakeholders in implementation of the Framework? • involve a diverse range of stakeholders? 	✓	<p>The current text does not include issues for the London Plan review – these should be integrated into the document and connections made to the London Plan and a small number of other Mayoral Strategies.</p> <p>The role of the partnership in the development of the SRDF is not clear. However, it is clear that local authorities will be expected to work in partnership to develop and deliver policies and actions.</p> <p>The Implementation Plan for the SRDF should set out clear actions for stakeholder and civic participation.</p>
4	<p>4.1 <i>Respect:</i> Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London’s diversity as its key strength. The right of all London’s citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others. Does the framework:</p> <ul style="list-style-type: none"> • promote a culture of tolerance, fairness and respect for people and the environment taking into account key strengths and needs within the sub-region? • recognise diversity as a key strength? • Recognise the way which the framework may impact differently on differently groups within the sub-region. <p>4.2 <i>Safety:</i> Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion. To what extent does the framework:</p>	✓/?	<p>The diversity of communities within the sub-region is referenced in the Framework – however, diversity, is not addressed in terms of its contribution to the sub-region’s economic and social strength.</p> <p>The influence of diversity on housing needs/types is mentioned.</p> <p>The SRDF fails to analyse how the sub-region’s diversity may aid its development. The implications of diversity for the SRDF are not addressed. The lack of any links to economic priorities for the sub-region also limits the extent to which the contribution of development to ethnic and other minorities can be addressed.</p> <p>The SRDF does make reference to safety and safer communities and also the need to incorporate concerns over safety into developments.</p>

4.3	<ul style="list-style-type: none"> • promote safety and reduce the threat and fear of crime? • Promote the creation of safer communities <p><i>Vibrancy:</i> Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the vibrancy and creativity of the sub-region and its communities • involve transparent and participatory processes to resolve conflicts? (eg citizens’ panels, Planning for Real exercises, involvement of Local Strategic Partnerships etc) • provide local communities with opportunities to make inputs on issues that will increase their sense of place/positive feeling about the sub-region. 	✓/?	There are clear indications that local authorities will need to take account of the needs of communities. In directing development towards the creation of “sustainable communities” it will be important to ensure that the needs and aspirations of communities are met via ‘bottom up’ as well as ‘top down’ processes. The SRDF is not very explicit on the types of processes and mechanisms that should be adopted.
5			
5.1	<p><i>Environment:</i> We will protect and improve the city’s natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links. Does the framework:</p> <ul style="list-style-type: none"> • protect and improve the natural and built environment? • support the objectives and implementation of the Mayor’s environmental Strategies? • consider the state of the environment in the sub-region and priorities for environmental improvement? 	✓/?	<p>It is not at all easy from the SRDF to distinguish what the strengths and weaknesses of the sub-region’s environment actually are.</p> <p>The coverage of the environment in the SRDF is quite selective. Issues such as biodiversity, access to green space and flooding are well covered, other issues are treated in a quite superficial fashion. Some statements regarding the creation of biodiversity, design standards for flooding, etc, are totally lacking in context. There would seem to be significant scope for local authorities to carry out useful and effective improvements to the environment in the sub-region. The coverage of environmental issues in the data sheets for Areas of Opportunity is generally superficial. Whilst the idea of the “Green Grid” is mentioned – no analysis is provided of its spatial implications.</p>
5.2	<p><i>Resources:</i> We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste. Does the framework:</p> <ul style="list-style-type: none"> • Promote energy efficient buildings • promote the minimisation of pollution and the clean up of polluted areas in the sub-region • promote the most prudent and efficient use of resources? • support the objectives and implementation of the Mayor’s Waste Strategy? 	X	<p>Resource efficiency and resource management issues are not really addressed by this SRDF. Energy issues are well covered but effective implementation will depend on local authorities. Although the SRDF deals with sustainable construction it would have been useful to have a far clearer statement of key principles of sustainable design and also clear identification of areas where there is scope for pilot schemes/projects in the region. Relatively little information of this type is included. The role of public sector buildings in driving best practice in sustainable construction, sustainable procurement and resource efficiency should have been made more clearly.</p> <p>The “missing link” between the SRDF and the EDS means that there are</p>

			<p>potential missed opportunities linking economic development and resource efficiency.</p> <p>It is unclear to what extent the SRDF will help to address existing inefficiencies in resource management.</p> <p>The recognition of the need to integrate planning for waste management into development planning is positive.</p> <p>The SRDF quotes a projected trend for waste arisings that would not appear to be sustainable. London has policies and strategies that seek to improve the management of waste and reduce the quantities of waste generated. Successful implementation of these policies will help to address this issue. The growth projected in the SRDF will require new infrastructure to be provided but this should be accompanied by policies and initiatives targeting waste reduction.</p> <p>The potential link between poor air quality and environmental exclusion is not explored. However, the focus on sustainable communities should help to address most aspects of environmental exclusion as long as it addresses existing as well as new development.</p>
6	Getting results		
6.1	<p><i>Progress:</i> We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards. Does the framework:</p> <ul style="list-style-type: none"> • promote local development that delivers wider economic, social and environmental objectives? • Promote development that addresses the employment and training needs of communities with the highest unemployment/ lack of skills in the sub region • promote development that builds the potential for future/long-term prosperity and quality of life via the policies and location of decisions it promotes? • Promote a balanced mix of housing and employment development in the sub-region that reflects the needs of all communities/groups 	<p>✓</p>	<p>The East SRDF does promote the principle of mixed development. It also addresses the need to tackle skills shortages in the local population, and the need to ensure that local communities can take advantage of the types of jobs likely to arise from developments in the sub-region. The lack of link to the EDS and key sectors and their training/skills requirements is unfortunate. However, it is rather limited in terms of concrete actions to support these principles.</p> <p>Section 3b of the SRDF does contain an extremely useful list of actions for local authorities and other partners relating to issues relating to community businesses and skills and training needs.</p>
6.2	<p><i>Innovation:</i> All the different parts of our economy will consistently invest in new technologies, new solutions, new</p>	<p>X</p>	<p>Actions relating to the existing population and its needs make up only a relatively small percent of action points in the SRDF. This SRDF does</p>

- | | | | |
|--|--|--|--|
| <ul style="list-style-type: none">• Involve communities/local residents in the implementation of the framework | | | |
|--|--|--|--|

North London Integrated Impact Assessment

A3.1 *INTRODUCTION*

This paper contains the findings of an Integrated Impact Assessment (IIA) of the Working Draft of the North London SRDF (dated 5th July 2005).

The appraisal findings are based on an initial appraisal of a working draft of the SRDF carried out in April 2005 and on a second cycle of appraisal carried out on the July 2005 version of the SRDF.

A3.2 *OVERALL FINDINGS OF THE IIA*

The SRDF for North London contains a very clear vision for the sub-region reflecting the London Plan and the planning and economic development priorities for the sub-region. It presents the key priorities and development needs of the sub-region in a very accessible fashion and also contains clear sets of key actions for discussion/implementation at later stages in the implementation of the SRDF and development of the local authorities LDFs.

The Framework sets out very clearly the opportunities and the challenges facing the sub-region, in particular in terms of delivering on targets for the provision of housing, employment and transport and the potential roles of the different urban centres within the sub-region's urban hierarchy. It also makes clear the challenges facing the outer London economy as a whole as they affect this sub-region.

A number of 'Opportunity Areas' and 'Intensification Areas' are identified in the SRDF and some useful data is provided for each area. The role/function of each area is described very briefly in the current text and could be expanded on.

The issue of transport infrastructure, congestion, levels of use of public transport and maintaining or improving current levels of access to public transport are all covered in some detail in the Framework. Public transport and London's ability to provide adequate services in terms of both quality and accessibility is the single most important sustainable development issue for all of the sub-regions. The timing of infrastructure provision and upgrading and the effectiveness of demand management measures and access to all modes of transport are clearly of fundamental importance not only to the deliverability of the framework but to the quality of life and quality of development of the sub-region. In this the sub-region is the same as the other four sub-regions.

A3.3 *KEY FINDINGS*

- The Introduction section of the North London SRDF is extremely useful in terms of it providing an accessible summary of the role of the SRDF the process of development of the SRDF and how it relates to the London Plan.

- The North London SRDF provides a clear picture of the sub-region and the key issues it need to address in terms of spatial planning;
- It contains an excellent balance among the components of sustainability;
- Description of key planning, social and infrastructure issues is good;
- Recognition of the need of different communities and the sub-regional dimensions of deprivation, social exclusion etc is better than in other SRDF's appraised to date;
- The analysis of Areas of Opportunity/Intensification Areas is helpful;
- Environmental issues are, in the main, dealt with in a way that reflects the spatial focus of the plan ie sub-regional or major site level;
- The opportunity to identify sub-regionally distinct indicators to rend the monitoring process set out in the London Plan very helpful and will allow the sub-region to address specific issues if importance to North London;
- Transport, probably the single most significant sustainability issue, is dealt with in a very clear manner. No simple solutions are offered which is realistic;
- The SRDF is quite modest about the strengths of the sub-region;
- The use of evidence in the SRDF is is well thought out with useful summarised/key points in the main text and more extensive analysis/presentation of data in the appendices. The research has been used to develop a clear narrative to the Framework.; and
- The 'Proposed Actions' are excellent and very thought provoking - they provide good material for engagement with consultees.

A3.4 *THE APPRAISAL PROCESS*

The appraisal to date has focused on the 'direction' of development proposed in the SRDF since it does not contain (and indeed is probably not intended in many cases to contain) sufficiently precise locational development detail for a more detailed assessment of the likely impacts of the SRDF.

The appraisal framework focuses on the extent to which the SRDF reflects, in a fashion appropriate to a sub-regional spatial planning document, the LSDC's Sustainable Development Framework for London and the Objectives of the London Plan. The appraisal has used a series of appraisal questions based on the LSDC framework and additional inputs form a range of London Stakeholder to "interrogate" the SRDF. The appraisal has not addressed specific concerning stakeholder issues the sub-region at this stage.

Table 1 below sets out the results of the initial appraisal. To help with the interpretation of findings, symbols have been used to summarise the main thrust of the appraisal, as follows:

✓	Overall impact influence likely to be positive
?	Overall impact influence unclear
×	Overall impact influence likely to be negative
××	Clear, strong negative impacts
-	Neutral

Table.1 Initial Appraisal of the North London SRDF

Key:

✓	= positive impact/influence
-	= neutral
?	= unclear impact/influence
X	= negative impact

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating North London	Comments
1	Overall Objective		
1.1	<p>We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the achievement of integrated environmental, economic and social development equally, minimising trade offs? <i>(eg place SD as an overall objective of the framework and integrate it firmly in the vision for the sub regions development)</i> • involve transparent processes in cases where trade-offs between competing objectives have been necessary? <i>(eg does the document clearly indicate/document the trade-off processes involved in the development of the framework?)</i> 	✓	<p>The SRDF clearly recognises the importance of balanced sustainable growth. It focuses on planning growth in ways that allow it to be 'accommodated in the right place, at the right time and in a sustainable way(introduction, 3)'. Section 14 of Part One of the SRDF States that 'The task is to manage growth so that it goes into places and take the formas that will revitalise areas of deprivation, raise the quality of life and environment produce the most sustainable outcomes.</p> <p>The SRDF frequently cites the need for balanced development and the consideration of the need for balance in LDFs, Community Strategies and other documents. This is an important recognition of the need to address implicit and explicit trade offs in spatial planning at both sub-regional and local levels.</p>
1.2	<p>Key Issue - Deprivation To What extent does the framework:</p> <ul style="list-style-type: none"> • address economic, health, social and environmental issues in areas of acute deprivation? <i>(eg focus on areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> • identify areas of deprivation within the sub-region or within communities of interest • involve people from areas of acute deprivation? <i>(eg from areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> 	✓	<p>The SRDF for North London addresses issues of deprivation and social exclusion in some depth. It covers all of the main areas addressed by the Index of Multiple Deprivation (IMD) and also includes environmental deprivation/exclusion. It does not provide a detailed evidence base but it appears that such an evidence base does underpin the analysis and statements in the text.</p> <p>Communities and areas suffering particular issues relating to deprivation are clearly identified in the SRDF.</p> <p>The role of deprived communities in the development of the document is</p>

1.3	<ul style="list-style-type: none"> involve other people with expertise in deprivation issues? E.g. community welfare groups, social services teams, education, health and livelihoods experts. <p>Key Issue – Social Exclusion</p> <p>To what extent does the framework:</p> <ul style="list-style-type: none"> promote social cohesion across the sub-region eg. Encourage cross-community working on planning and development issues, create facilities that serve the need of more than one grouping, foster the integration of marginalized groups into society. address economic, social and environmental issues affecting individuals and communities within the sub-region suffering social exclusion? (eg equality target groups – women, black and minority ethnic people, children and young people, the homeless, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups) involve individuals and communities suffering social exclusion in developing/ commenting on the framework? (eg equality target groups – women, black and minority ethnic people, children and young people, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups) involve other people with expertise in social exclusion issues? i.e. groups and individuals within the sub-region working with or representing excluded groups, minority groups etc, also experts/research bodies working on social exclusion in London. 	✓	<p>not made clear but the need for community engagement in development and planning issues at borough level is recognised throughout the SRDF. There is, therefore, a strong basis for ensuring that deprived / marginalised groups and their concerns are addressed in the ongoing planning of development and the allocation of facilities in the sub-region.</p> <p>The SRDF clearly recognises the need to address social exclusion. Section 29 of Part One of the SRDF discusses some of the needs of deprived communities in the region. It recognises the need to provide facilities, opportunities for employment, training and also leisure/recreation infrastructure in deprived areas and across all of the communities in the sub-region. Commenting on the large social housing estates in the sub-region (some of the highest concentrations of deprivation) within the sub-region the SRDF notes that “<i>They are characterised by isolation and need co-ordinated programs of improved public transport, skills development, capacity building and environmental improvement</i>”.</p>
2			
2.1	<p>Objectives, responsibility, targets, indicators. To what extent does the framework:</p> <ul style="list-style-type: none"> establish clear and fully integrated economic, social and environmental objectives? Contain explicit information on long, medium and 	✓/✗	<p>As with the other SRDF’s this aspect of the Framework is currently quite weak. Whilst some targets and goals are included, especially those that relate to the London Plan, the document currently lacks a performance measurement framework.</p>

	<p>short term targets/ goals.</p> <ul style="list-style-type: none"> • specify responsibility for delivery of those objectives? • contain targets on those objectives? • include indicators to monitor progress towards those objectives/ targets? 		
3			
3.1	<p><i>Responsibility:</i> As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability. To what extent does the framework:</p> <ul style="list-style-type: none"> • account for and minimise the negative, and maximise the positive, impacts of proposals on people in the rest of the UK and beyond? <i>(eg explicitly consider potential impacts of the framework outside of the sub-region (regional, national and international))</i> • constitute best practice when compared to other approaches taken around the world? <i>(eg compare to for example Sustainable Seattle, work on the Sydney Olympics, information from the European Sustainable Cities website)</i> • make use of the best information available? <i>(eg review coverage of the Evidence Base and indicate where gaps exist and how these may be addressed for the future. Particular issues may relate to information on environmental conditions/performance, likely demographic trends, the effects of climate change, changes in technology and distribution of income etc)</i> • include an assessment of the wider impact of the framework, of implementation involving wider stakeholders, and of likely links to the rest of London and the UK 	<p>✓/✗</p> <p>✓/✗</p> <p>?</p> <p>✓</p> <p>✓</p>	<p>This aspect of the LSDC Framework is not really addressed in the current draft but this may well be due to its sub-regional focus. These issues are well covered in the London Plan from which it is derived.</p> <p>The SRDF does acknowledge the need to take account of the effect on the framework on adjacent regions and vice versa. It is unclear from the text of the SRDF as to how effective and robust a process this has been given the various processes and timescales involved.</p> <p>The SRDF does not really perform the same function as the example cited the London Plan would be a better comparison.</p> <p>The use of the available evidence base is quite strong. The Annexes contain some useful information and research is used to substantiate the actions in the Framework.</p> <p>The SRDF is concrete in terms of its recognition of the need to be aware of and integrate with other sub-regions in London, adjacent regions, etc.</p>
3.2	<p><i>Capability:</i> All of us – individuals, households, businesses, local and regional government, voluntary groups – will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote access to information, knowledge and support for all groups - individuals, households, organisations, 	<p>✓</p>	<p>The Framework recognises the value of partnership and the role of partnership in its development and implementation. The Role of the North London Strategic Alliance is highlighted in the document. Clear roles are developed for key partners such as the Local Authorities, the NLSA, key delivery agencies, the utility companies, etc. There is also clear recognition of the role of community groups, etc. It is quite clear from the text of the SRDF that communication and participation have been and will continue to be key aspects of the development and</p>

<p>3.3</p> <p>3.4</p> <p>4</p>	<p>government etc?</p> <ul style="list-style-type: none"> • ensure proper provision of information on the Framework itself? • Include a clear information strategy that includes all groups and communities in the sub-region? • Address the information needs of people outside the sub-region. <p><i>Creativity:</i> We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective. To what extent does the framework:</p> <ul style="list-style-type: none"> • establish mechanisms to promote effective decision-making? • set out a longer term perspective appropriate to the issue being addressed, to ensure future prosperity and quality of life? • involve new and creative ways to promote effective decision-making? • involve clear links between the long-term perspective and other long-term visions, documents, strategies etc? (<i>eg the London Plan and other Strategies</i>) <p><i>Ownership:</i> We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote civic participation, ownership and responsibility in the sub-region and more broadly in London through the involvement of different stakeholders in implementation of the Framework? • involve a diverse range of stakeholders? 	<p>✓</p> <p>?</p>	<p>delivery of the Framework.</p> <p>The issue of provision of information on the Framework itself is not covered in any great detail and there is no reference to a Communication Strategy.</p> <p>Communication with groups outside the region is not addressed although the fact that the SRDF will need to influence and be influenced by other regional and sub-regional strategies is explicitly acknowledged.</p> <p>Annex 5 of the SRDF contains some interesting material on issues of relevance to the sub-region that will need to be integrated into the review of the London Plan. The time horizon extends to 2026. Many of the issues raised are of direct relevance to sustainable development.</p> <p>The emphasis within the Framework on partnership, on the roles and responsibilities of particular partners and groups of partners demonstrates an awareness of and sensitivity to the need for effective decision-making so as to ensure effective delivery. The introduction of the Framework states that <i>“Its purpose is to facilitate the delivery of a sustainable and prosperous future for the sub-region by encouraging all the different agencies and communities within it to work to a compatible set of policies and targets”</i>.</p> <p>The Framework makes reference to a number of Mayoral Strategies as being of relevance.</p> <p>The Framework is also very focused on making <i>“connections with other London-wide or sub-regional strategies, policies, plans and programmes, which provide an ‘enabling’ framework for its implementation”</i>.</p> <p>It is unclear from the current draft of the Framework how civic participation will be ensured. There is some attention paid to the need for LDF and Community Strategies to be broad-based and be aware of <i>“bottom-up”</i> priorities and issues.</p> <p>The role of the NLSA and other Stakeholder groups in developing the Framework are made clear. How other Stakeholders, especially at community level, have been involved is unclear.</p>
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4.1	<p><i>Respect:</i> Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others. Does the framework:</p> <ul style="list-style-type: none"> • promote a culture of tolerance, fairness and respect for people and the environment taking into account key strengths and needs within the sub-region? • recognise diversity as a key strength? • Recognise the way which the framework may impact differently on differently groups within the sub-region. 	✓	<p>Section 13 of Part One of the Introduction of the Framework notes that "North London is a varied sub-region with a vibrant cultural mix" Section 23 of Part One also mentions that the sub-region has 'a variety of strongly defined communities Section 28 specifically mention diversity as a source of strength.</p> <p>Section 45 of the Framework states that "Local Development Documents and area frameworks for major new developments need to ensure an appropriate range of community facilities to meet the diverse needs of the local population. This needs to include appropriate religious facilities, as well as libraries and community centres".</p> <p>The SRDF also notes (Section 3.164) that "Housing, employment, social and transport policies need to reflect the particular needs of these (ethnic minority) groups".</p> <p>So, diversity is very much a strength of the sub-region and is recognised as such within the SRDF. It also notes that "The SRDF process provides an opportunity to explore the relationship between strategic and local targeting in addressing the needs of different communities".</p>
4.2	<p><i>Safety:</i> Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote safety and reduce the threat and fear of crime? • Promote the creation of safer communities 	✓	<p>In addressing the allocation of growth across the sub-region the SRDF notes that "It will also be important not to overlook the non-planning or physical regeneration factors that are important to the success of an area...., Real or perceived levels of crime.....".</p>
4.3	<p><i>Vibrancy:</i> Our communities will be dynamic, stable, adaptable, innovative, progressive - creating a city in which conflicts will be resolved as part of a transparent and participatory process. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the vibrancy and creativity of the sub-region and its communities • involve transparent and participatory processes to resolve conflicts? (eg citizens' panels, Planning for Real exercises, involvement of Local Strategic Partnerships etc) • provide local communities with opportunities to make 	x/✓	<p>This aspect of the LSDC framework is implicit rather than explicit in the draft of the SRDF examined for this appraisal. Whilst it would appear that many residents like their sub-region and their involvement in LDF's, Community Strategies, etc, is seen as important, very little that is concrete is included in the SRDF.</p> <p>Much of this issue (raised in the LSDC framework) will, it is assumed, be dealt with at LDF/Community Strategy level rather than at the level of the SRDF.</p>

	inputs on issues that will increase their sense of place/ positive feeling about the sub-region.		
5			
5.1	<p><i>Environment:</i> We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links. Does the framework:</p> <ul style="list-style-type: none"> • protect and improve the natural and built environment? • support the objectives and implementation of the Mayor's environmental Strategies? • consider the state of the environment in the sub-region and priorities for environmental improvement? 	✓	<p>Environmental quality and quality of life issues are an integral part of the approach adopted in the SRDF. The need to conserve and manage existing assets is recognised as is the need to upgrade and provide new assets in some areas where levels of provision are currently too low. Access to green/open spaces is a key issue for a large part of the sub-region and this is recognised as a key need that should be addressed in the implementation of the SRDF.</p> <p>Section 4 of the SRDF provides useful information on the priority themes of relevance to the development to the sub-region, good evidence is provided of both strengths and challenges in terms of environmental quality.</p> <p>The quality of the natural and built environment is recognised as one of the sub-region's strengths. <i>"There will have to be a sensitive approach in which more intensive and sustainable development takes place across the sub-region in a form that respects the traditional environments of North London, many of which attract people because of their green and open aspect and high quality of life"</i>.</p> <p>The SRDF notes the need to address waste management and flood risk issues in the sub-region. Waste arising are predicted to increase during the period of the SRDF – the scale/rationale for this is not provided in the Framework.</p> <p>The SRDF (section 4.168) notes that 'well directed development' of a high standard can provided the stimulus and resources needed to raise environmental quality. Section 1.170 states the 'overall North London performs relatively well on environmental and sustainability indicators' this statement is not substantiated.</p>
5.2	<p><i>Resources:</i> We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste. Does the framework:</p> <ul style="list-style-type: none"> • Promote energy efficient buildings • promote the minimisation of pollution and the clean up 	✓/x	<p><i>Section 4B</i> of the SRDF deals with some aspects of sustainable design and construction. It also deals with the use of renewable energy sources in new developments. However, resource issues and resource management are not a key component of the SRDF. It would have been useful to see more recognition of these issues at least in the analyses of the Opportunity Areas/Intensification Areas presented in the SRDF.</p>

	<p>of polluted areas in the sub-region</p> <ul style="list-style-type: none"> • promote the most prudent and efficient use of resources? • support the objectives and implementation of the Mayor’s Waste Strategy? 		<p>The issue of contaminated land is not addressed. This could potentially be a significant issue in some areas highlighted for development due to previous uses.</p> <p>Waste management issues may be resolved pending current amendments to policy. (see above)</p>
6	Getting results		
6.1	<p><i>Progress:</i> We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards. Does the framework:</p> <ul style="list-style-type: none"> • promote local development that delivers wider economic, social and environmental objectives? • Promote development that addresses the employment and training needs of communities with the highest unemployment/ lack of skills in the sub region • promote development that builds the potential for future/long-term prosperity and quality of life via the policies and location of decisions it promotes? • Promote a balanced mix of housing and employment development in the sub-region that reflects the needs of all communities/groups 	✓	<p>The SRDF is very clear on the need for achieving durable progress in terms of the spatial development of the sub-region.</p> <p><i>“This SRDF places great emphasis on the need for integrated planning by a range of partners at the earliest possible stage to ensure that development is sustainable and brings an improved quality of life to local communities”.</i></p> <p>It also highlights the importance of training and skills as an integral part of the development philosophy of the sub-region. It notes that <i>“Substantial residential and employment growth gives an opportunity to strengthen the sub-region’s spatial structure and to stimulate areas in need of regeneration”.</i></p> <p>The Framework also notes that <i>“At present, there are many highly qualified workers, but also a large pool of people with insufficient skills and often no qualifications. The NLSA is clearly right to give high priority to education and to skill development”.</i></p> <p>It also notes that <i>“the provision of good quality childcare ... is crucial to ensuring higher employment rates and reducing child poverty in North London”.</i></p>
6.2	<p><i>Innovation:</i> All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.</p> <ul style="list-style-type: none"> • promote investment and innovation as integral parts of balanced development of the sub-region? • Prevent the loss of indigenous businesses 	✘	<p>The issue of innovation is not addressed in the current SRDF. The Framework does, however, address the important of SME businesses to the sub-region’s economy. The value of local economies is also stressed in the RSDF.</p> <p>The lack of detail on economic priority sectors(some read across from the sub-region’s EDS would be useful) makes discussion of innovation within the SRDF.</p>
6.3	<p><i>Esteem:</i> All forms of work will be recognised and valued. Paid</p>	✓	<p>Section 3 of the SRDF raises some important issues for this component of</p>

6.4	<p>employment will be plentiful.</p> <ul style="list-style-type: none"> • promote employment for all? • recognise and value unpaid work? • involve the voluntary/community sector? • engage with the unpaid sector (eg the unemployed, young people etc)? <p>Access: We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities. Does the framework:</p> <ul style="list-style-type: none"> • promote policies that address the provision of accessible facilities/local key services (including health services and childcare), food, green space, cultural/sporting/ • leisure activities, and other amenities? • address sub-regional priorities to provide access for all to good housing • promote the development of mixed use developments which ensure good access to the above services and amenities? • promote public transport • Involve communities/local residents in development of the framework • Involve communities/local residents in the implementation of the framework 	✓/✗	<p>the appraisal framework. In particular, the Proposed Actions recognise the need to review strategies relating to the engagement of deprived communities and individuals in the economy. It also requests the preparation of BME/SME business development strategies and the need to support and develop the community and voluntary sectors.</p> <p>Access to opportunities, improved facilities, housing etc runs through the SRDF and is clearly perceived as a key objective (and is the one focus of <i>Section 2</i>). The SRDF also addresses the need to deal with deficiencies in access to greenspace, leisure and recreation facilities, etc.</p> <p>The Framework also recognises the need to address current deficiencies in, for example, the quality of housing in some areas of the sub-region.</p> <p>It notes that <i>“The demands of growth and the need to remedy current deficiencies will mean that many community services will require space for expansion.... . These will need to be located as far as possible in places with good accessibility by Public Transport.... ”</i>.</p> <p>The SRDF does promote access to public transport but also recognises the challenge this raises in terms of resources / timing of development.</p> <p>The issue of congestion is discussed – there would appear to be considerable scope for demand management but this will need to be managed at a London-wide scale to be effective.</p> <p>The promotion of warehousing and storage uses in the sub-region is on the one hand reasonable given local strengths in this business area but on the other raises concerns over congestion from vehicles ill-suited to large areas of a mainly residential sub-region.</p> <p>Local communities will be a key part of the focus of LDF’s. this is indicated in various sections throughout the RSDF.</p>
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South London Integrated Impact Assessment

A4.1 INTRODUCTION

This paper contains the findings of an Integrated Impact Assessment (IIA) of the Sub Regional Development Framework (SRDF) for South London. It is based on an initial appraisal of an early draft of the Framework dated 13 December 2004 and on a detailed appraisal of the Consultation Draft date June 2005.

A4.2 OVERALL FINDINGS OF THE IIA

At present the SRDF does not contain a vision of what a more sustainable, better integrated and resource efficient sub-region would look like. No clear direction or expected outcome emerges from the Framework. Based in projected housing growth and a potentially negative employment outcome, the picture of a 'dormitory' sub-region emerges.

Much of the text, especially in sections 3 and 4 and in those parts of section 2 dealing with social infrastructure are poorly supported in terms of evidence. This gives an overall impression of vagueness.

The Evidence base assembled for the SRDF, is strong for planning and development issues but largely lacking for social, environmental and health issues. This creates a significant imbalance in the Framework that is unhelpful in trying to understand what it means.

The text of the SRDF contains a large number of statements that have no evidential base and this weakens the overall narrative. Typical examples include:

- 'Some of the sub-region's historic strengths will be less significant in a changing economy';
- 'as a place to live and work, South London has on of the most attract environments in London'; and
- 'the sub region developed from a set of small communities. Subsequently, ribbon development and growth characterised by single uses and characterless environment have weakened the underlying structures'.

Key findings of this assessment include:

- there is no clear vision/development path for the sub-region set out in the SRDF;
- no indication is given as to what would constitute a successful SRDF;
- it is unclear what sustainable growth would mean for this sub-region;

- the use of two sets of employment predictions area positive, the other negative is not accompanied by any detailed analysis of their implications;
- outside certain discrete elements of planning and development the use of evidence in very limited;
- coverage of people issues including equalities is very limited;
- discussion of deprivation, social and economic and also environmental exclusion is very limited;
- there is very little discussion of existing needs/problems;
- sustainable development issues are not, in general, referenced to existing/potential issues in the sub-region but are referenced only to the London Plan;
- equality issues are not discussed to any extent in the document;
- it appears likely that the ecological footprint of the sub-region will increase even if employment decreases;
- the SRDF lack any sub-regional dimension in terms of its monitoring framework at present.

A4.3

THE APPRAISAL PROCESS

The appraisal to date has focused on the ‘direction’ of development proposed in the SRDF since it does not contain (and indeed is probably not intended in many cases to contain) sufficiently precise locational detail for a more detailed assessment of the likely impacts of the SRDF.

The appraisal framework focuses on the extent to which the SRDF reflects, in a fashion appropriate to a sub-regional spatial planning document, the LSDC’s Sustainable Development Framework for London and the Objective of the London Plan. The appraisal has used a series of appraisal questions based on the LSDC framework to “interrogate” the SRDF.

Table 1 below sets out the result of the initial appraisal. To help with the interpretation of findings, symbols have been used to summarise the main thrust of the appraisal, as follows:

- ✓ Overall impact influence likely to be positive
- ? Overall impact influence unclear
- ✗ Overall impact influence likely to be negative
- ✗✗ Clear, strong negative impacts
- Neutral

Table.1 Draft Appraisal of the South London SRDF

Key:

✓	= positive impact/influence
-	= neutral
?	= unclear impact/influence
X	= negative impact

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
1	Overall Objective		
1.1	<p>We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised.</p> <ul style="list-style-type: none"> • promote the achievement of integrated environmental, economic and social development equally, minimising trade offs? <i>(eg place SD as an overall objective of the framework and integrate it firmly in the vision for the sub regions development)</i> • involve transparent processes in cases where trade-offs between competing objectives have been necessary? <i>(eg does the document clearly indicate/document the trade-off processes involved in the development of the framework?)</i> 	?	<p>The current draft of the SRDF is in line with the requirements of the London Plan but it is unclear to what extent SD has been central to the thinking it contains or is a driver for the implementation of the SRDF. At present the text does not emphasise integrated development except at a very generic level. There is not overall vision for the sub-region that clearly articulated what sustainable development of the area would entail.</p> <p>Sections 1 and 2 states that one central issue for the sub-region is how to move forward together in a sustainable strategy that accommodate this growth in places and forms that enhance the relatively good environment and support continuing prosperity. This issue is not really developed to any great extent in the SRDF.</p> <p>The issue of trade-offs is not addressed in the current SRDF.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
1.2	<p>Key Issue – Deprivation</p> <ul style="list-style-type: none"> • address economic, health, social and environmental issues in areas of acute deprivation? <i>(eg focus on areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> • identify areas of deprivation within the sub-region or within communities of interest • involve people from areas of acute deprivation? <i>(eg from areas suffering from acute deprivation in reference to indicators such as IMD rankings)</i> • involve other people with expertise in deprivation issues? 	X/?	<p>The issue of disadvantaged areas or communities within the sub-region is only addressed in passing in Sections 2 and 3 of the SRDF. This mentions pockets of deprivation and the need for co-ordinated programmes of improvements. The South of London may be relatively well-off but it also contains areas of relative deprivation – how these areas and also deprived groups or communities in the sub-region will benefit from/be involved in the development of the SRDF is not clear.</p> <p>The use of evidence is weak.</p> <p>The issue of homelessness/need for affordable housing is discussed but rates of delivery of affordable housing in the sub-region would appear to be a significant challenge.</p>
1.3	<p>Key Issue – Social Exclusion</p> <ul style="list-style-type: none"> • promote social cohesion across the sub-region • address economic, social and environmental issues affecting individuals and communities within the sub-region suffering social exclusion? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, the homeless, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> • involve individuals and communities suffering social exclusion in developing/commenting on the framework? <i>(eg equality target groups – women, black and minority ethnic people, children and young people, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups)</i> • involve other people with expertise in social exclusion issues? 	?	<p>The need to address issues of social exclusion within the sub-region is raised by the SRDF. However, the SRDF does not appear to be viewed as a vehicle for the direct promotion of social cohesion but rather, it is likely, that some of the developments promoted by the SRDF may have indirect benefits for social cohesion. The ‘schematic’ nature of the SRDF prevents detailed assessment of how it is likely to impact on social exclusion on the ground.</p> <p>Sections 2 and 3 of the SRDF recognise the issue of social and economic cohesion but provides no evidence to support the generic discussion of issues which is in turn very brief.</p> <p>Equalities target groups are mentioned in passing in the SRDF but no real analysis of the needs of these groups in the sub-region or how the SRDF will respond to their needs is provided.</p>
2	Ensuring Effective Implementation		

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
2.1	Objectives, responsibility, targets, indicators <ul style="list-style-type: none"> • establish clear and fully integrated economic, social and environmental objectives? • Contain explicit information on long, medium and short term targets/goals. • specify responsibility for delivery of those objectives? • contain targets on those objectives? • include indicators to monitor progress towards those objectives/targets? 	✓/?	<p>The current draft of the SRDF does specify targets set out in the London Plan. It also mentions other targets for development of particular types of service/provision of facilities. It does not contain, at present, a detailed set of monitoring indicators, implementation framework, etc, for the SRDF itself although in some cases, e.g., housing, the data will be easy to collect and an annual target has been set.</p> <p>The SRDF consultation process provided an opportunity for sub-regional stakeholders to provide inputs on sub-regionally specific indicators this would improve the SRDF considerably in terms of the monitoring and measurements of impact.</p> <p>It is unclear how excluded groups/communities will be involved in the development of the SRDF.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
3	Taking Responsibility		
3.1	<p><i>Responsibility:</i> As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet’s sustainability.</p> <ul style="list-style-type: none"> account for and minimise the negative, and maximise the positive, impacts of proposals on people in the rest of the UK and beyond? <i>(eg explicitly consider potential impacts of the framework outside of the sub-region (regional, national and international))</i> constitute best practice when compared to other approaches taken around the world? <i>(eg compare to for example Sustainable Seattle, work on the Sydney Olympics, information from the European Sustainable Cities website)</i> make use of the best information available? <i>(eg review coverage of the Evidence Base and indicate where gaps exist and how these may be addressed for the future. Particular issues may relate to information on environmental conditions/performance, likely demographic trends, the effects of climate change, changes in technology and distribution of income etc)</i> include an assessment of the wider impact of the framework, of implementation involving wider stakeholders, and of likely links to the rest of London and the UK 	?/✓	<p>The draft SRDF contains clear statements on the relationship of the sub-region to the remainder of London and to adjoining regions/sub-regions especially in the South East.</p> <p>The need to work across borders is recognised as are the links of the sub-region to the “London Fringe” and “Gatwick” sub-regions and their current plans being produced as part of the South East’s RSS.</p> <p>For key issues such as transport, retail provision, office space and housing links are also made.</p> <p>To date the SRDF does not contain a detailed assessment of the impacts and benefits of the framework on adjacent regions/areas or indeed the likely impacts of proposals within the SE RSS on the South of London.</p> <p>In terms of the Evidence Base used to generate the SRDF, this relies on the standard data sets on demographics, employment, etc, and on specific pieces of research commissioned by the GLA, LDA and others. Use has also been made of data collected by the SLP. The evidence base is strong in terms of economic and planning and development issues but is, weak on social and environmental aspects of the SRDF and the sub-region. From the evidence in the text these ‘gaps’ are likely to be filled in future versions of the SRDF.</p> <p>At present the SRDF lacks much of an evidence base for both the strengths and weaknesses of the sub-region or data which would help to develop projections of alternative development scenarios.</p> <p>It is not clear that it is within the scope of the SRDF to provide an assessment of its wider impact. In time, once the development proposals (at least in terms of housing) are available for the ‘London Fringe’ and Gatwick sub-regions of the SE RSS it may at least be possible to assess possible synergies and antagonisms.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
3.2	<p><i>Capability:</i> All of us – individuals, households, businesses, local and regional government, voluntary groups – will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable</p> <ul style="list-style-type: none"> • promote access to information, knowledge and support for all groups - individuals, households, organisations, government etc? • ensure proper provision of information on the Framework itself? • Include a clear information strategy that includes all groups and communities in the sub-region? • Address the information needs of people outside the sub-region. 	?/✓	<p>The consultation on the draft SRDF allows for sub-regional inputs/impacts from local stakeholders to be made. This should help to make to documents more sub-regionally relevant.</p> <p>This SRDF, like to others, does not contain a clear information strategy.</p>
3.3	<p><i>Creativity:</i> We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.</p> <ul style="list-style-type: none"> • establish mechanisms to promote effective decision-making? • set out a longer term perspective appropriate to the issue being addressed, to ensure future prosperity and quality of life? • involve new and creative ways to promote effective decision-making? • involve clear links between the long-term perspective and other long-term visions, documents, strategies etc? (eg the London Plan and other Strategies) 	✓	<p>The SRDF is clearly committed to a timescale that extends to 2016 and by implication beyond. This medium term view is quite clearly set out for planning and development issues – it is less clear for social and environmental issues.</p> <p>Much of the decision – making on key sustainability issues will lie with the boroughs and their LDF's except for issues such as transport.</p>
3.4	<p><i>Ownership:</i> We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.</p> <ul style="list-style-type: none"> • promote civic participation, ownership and responsibility in the sub-region and more broadly in London through the involvement of different stakeholders in implementation of the Framework? • involve a diverse range of stakeholders? 	✓	<p>The SRDF makes a clear commitment to stakeholder involvement and mentions a range of stakeholder groups that have already had some input to its development and to others who will be involved as it is carried forward. It would be useful for the document to contain a list of stakeholders/stakeholder groups that have made inputs to the SRDF. The roles of different stakeholders in implementing the framework should also be made explicit.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
4	Developing Respect		
4.1	<p><i>Respect:</i> Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others. Does the framework:</p> <ul style="list-style-type: none"> • promote a culture of tolerance, fairness and respect for people and the environment taking into account key strengths and needs within the sub-region? • recognise diversity as a key strength? • Recognise the way which the framework may impact differently on differently groups within the sub-region. 	?	At present the issue of diversity is not particularly well developed in the SRDF. The issue of how particular groups may benefit from the growth forecast in the SRDF is not addressed nor is there an assessment of key strengths/needs within the sub-regions in terms of diversity.
4.2	<p><i>Safety:</i> Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.</p> <ul style="list-style-type: none"> • promote safety and reduce the threat and fear of crime? • Promote the creation of safer communities 	✘	The issue of safety and how new developments may be safer or encourage the creation of safer communities in the wider sub-regions is not addressed in detail.
4.3	<p><i>Vibrancy:</i> Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.</p> <ul style="list-style-type: none"> • promote the vibrancy and creativity of the sub-region and its communities • involve transparent and participatory processes to resolve conflicts? (<i>eg citizens' panels, Planning for Real exercises, involvement of Local Strategic Partnerships etc</i>) • provide local communities with opportunities to make inputs on issues that will increase their sense of place/positive feeling about the sub-region. 	✓	<p>The SRDF is quite clear on the need to maintain and build on the quality of life and vibrancy of communities in the sub-region, especially with relation to town centres and other key locations within the sub-region. The importance of the local environment, the quality of the public realm, etc, as contributors to people's sense of community and of vibrancy is clearly recognised.</p> <p>Much of the detailed work on these issues will occur at LDF level.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
5	<i>Managing resources</i>		
5.1	<p><i>Environment:</i> We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links. Does the framework:</p> <ul style="list-style-type: none"> • protect and improve the natural and built environment? • support the objectives and implementation of the Mayor's environmental Strategies? • consider the state of the environment in the sub-region and priorities for environmental improvement? 	?/✓	Section 4 of the SRDF contains information on the environment of the sub-region and some of the challenges and opportunities which it provides. It also contains guidance on how development n should respect and enhance the environment. The condition of the environment is generally dealt with in descriptive/qualitative text which weakens the overall analysis of the contribution of the environment to the sub-region.
5.2	<p><i>Resources:</i> We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste. Does the framework:</p> <ul style="list-style-type: none"> • Promote energy efficient buildings • promote the minimisation of pollution and the clean up of polluted areas in the sub-region • promote the most prudent and efficient use of resources? • support the objectives and implementation of the Mayor's Waste Strategy? 	✓/X	<p>The current draft of the SRDF does mention the use of resources and the need for eco-efficient homes along the lines of BedZed but it does not address resource efficiency as a key component of quality design of industrial and service facilities.</p> <p>The need to minimise waste is addresses as is the need to reduced emissions. Reduction of water consumption is not mentioned. In general, the step change in behaviour need to improve resource efficiency and reduce the sub-region's ecological footprints is not dealt with.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
6	<i>Getting results</i>		
6.1	<p><i>Progress:</i> We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards. Does the framework:</p> <ul style="list-style-type: none"> • promote local development that delivers wider economic, social and environmental objectives? • Promote development that addresses the employment and training needs of communities with the highest unemployment/ lack of skills in the sub region • promote development that builds the potential for future/long-term prosperity and quality of life via the policies and location of decisions it promotes? • Promote a balanced mix of housing and employment development in the sub-region that reflects the needs of all communities/groups 	✓/X	<p>The current draft of the framework does promote local development but it is unclear to what extent this simply mirrors development ‘needs’ rather than broader sustainable development objectives.</p> <p>The question of skills needs is raised (very briefly) but the issue of the quality of jobs on offer to be produced via proposed development is not.</p> <p>The issue of what level of employment growth is likely to be delivered via the SRDF is made unclear by the use of contradictory information in terms of employment projections from the London Plan and subsequent research.</p> <p>In terms of promoting development that builds the potential for future/long-term prosperity in the sub-region and quality of life – as the SRDF notes, the options in terms of new developments are severely constrained by the availability of suitable sites.</p> <p>It is therefore important that these sites are developed with quality of life and sustainable development as key principles. The SRDF actively promotes mixed-use development where this can be delivered.</p>
6.2	<p><i>Innovation:</i> All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.</p> <ul style="list-style-type: none"> • promote investment and innovation as integral parts of balanced development of the sub-region? • Prevent the loss of indigenous businesses 	*/?	<p>At present the SRDF has little to say on innovation and its place in the development of the sub-region. Some indications are given that stakeholders are keen to examine hi-tech/innovative led business but this not developed in the text and is treated with caution (the reasons for which are not explained). Key sectors for London such as environmental goods and services are not mentioned.</p> <p>The sites rather than sectors focus the SRDF means that it is not focused on how the business economy of the sub-regions should develop to any great degree. The lack of an available sub-regional economic strategy exacerbates this problem.</p> <p>The SRDF recognises the importance of indigenous businesses but has not developed any clear role for indigenous SME’s within the sub-region. It is unclear how such companies fit into the development ‘model’ for the sub-region.</p>

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating London South	Comments
6.3	<p><i>Esteem:</i> All forms of work will be recognised and valued. Paid employment will be plentiful.</p> <ul style="list-style-type: none"> • promote employment for all? • recognise and value unpaid work? • involve the voluntary/community sector? • engage with the unpaid sector (eg the unemployed, young people etc)? 	✓/?	<p>The need to maintain and grow levels of employment is recognised in the SRDF. At present it does not deal in any detail with voluntary work, social enterprises, unpaid work, etc – this may be outside the scope of a SRDF although the importance of the voluntary/community sector is likely to grow in the future in many service areas.</p>
6.4	<p><i>Access:</i> We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities. Does the framework:</p> <ul style="list-style-type: none"> • promote policies that address the provision of accessible facilities/local key services (including health services and childcare), food, green space, cultural/sporting/leisure activities, and other amenities? • address sub-regional priorities to provide access for all to good housing • promote the development of mixed use developments which ensure good access to the above services and amenities? • promote public transport • Involve communities/local residents in development of the framework • Involve communities/local residents in the implementation of the framework 	✓	<p>The SRDF promotes the mixed-use developments. It has – in its current draft – relatively little to say on access to services (except for transport and health facilities) and facilities connected with leisure and amenity. It does not include statistics on access to open space/green space, sporting/cultural amenities etc as part of its evidence base at present.</p> <p>The need for mixed-use developments to address issues of access to a full range of services and amenities is hinted at in the draft. It is unclear to what extent there will be scope for this issue of access to be one of the key determinants of the implementation of schemes.</p> <p>The SRDF does address the issue of public transport and recognises the need to promote greater use of public transport in the sub-region. The extent to which transport investments will facilitate development and reduce reliance on the motor car are not addressed in detail.</p> <p>The role of local communities in the development and implementation of the framework appears to be of most significance at LDF level.</p>

West London Integrated Impact Assessment

A5.1 INTRODUCTION

This paper presents the findings of an Integrated Impact Assessment (IIA) of the Draft West London SRDF. It is based on an initial assessment of a draft of the Framework carried out in the Spring of 2005 and a detailed assessment based on the draft of the Framework issued in June 2005.

A5.2 OVERALL FINDINGS OF THE IIA

The draft SRDF for West London contains a clear vision for the sub-region reflecting the London Plan and the planning and economic development priorities for the sub-region.

The Framework sets out very clearly the opportunities and the challenges facing the sub-region, in particular in terms of delivering on targets for the provision of housing and the roles of the different urban centres within the sub-region's urban hierarchy.

It is not clear, however, what the future role of many centres will be or the extent to which the SRDF can help to support ongoing development or diversification of the urban centres.

The SRDF makes clear recommendations as to the issues which will need to be addressed in LDF's and other local planning documents. It is also clear on those issues which do not appear to have a sub-regional dimension. In the former case, on many occasions, rather than simply delegating responsibility to LDF's the Framework indicates how a particular issue could be analysed or addressed. This approach provides very useful links to the LDF's and helps to ensure that key issues are not lost. This approach to dealing with issues at the appropriate scale and via the appropriate process should be incorporated into all SRDF's.

A number of 'Opportunity Areas' and Areas of Intensification are identified in the SRDF and some useful data is provided for each area. Some further detail would be useful - but maybe more than is required from an SRDF e.g. important baseline issues, development timescales etc.

Key Findings

- The SRDF provides a detailed picture of the sub-region and options for its development.
- The SRDF does not address the effects of sustainability issues on growth options.
- Coverage of the key 'drivers' for change in the sub-region is good as is the focus on the need/rationale for intensification.
- Issues are generally well-presented but the evidence base is often quite limited case of social and environmental issues is weak.
- The economic and spatial characterisation of the sub-region is strong in terms of sectors and places but is generally weaker on people.

- The Framework has interesting things to say on the urban hierarchy of the sub-region – it could say even more in terms of future potential.
- The Framework makes a number of unsubstantiated statements on issues such as the quality of the environment.
- Links to other SRDF's and regions are poorly developed at present.
- The rates of completion for affordable housing are very low as is the progress on over crowding – this raises serious challenges for the SRDF.
- Issues of diversity, equality, deprivation etc are very poorly addresses by the Framework.
- The importance of diversity to the economic and cultural vibrancy of the area as well as to local economies is not well developed in the Framework.
- The sections on 'Securing economic and social inclusion' and on Sustainable local economies do not indicate how these issues will be affected by the implementation of the Framework.
- The SRDF mentions that over half of the projected increase in waste arisings is likely to come from commercial and industrial wastes. This suggests that the wrong sort of businesses are being attracted to the sub-region.
- 'Proposed actions' are used in a very positive and creative way which enriches the document and provides clear markers for issues to be explored/taken up by LDF's. However, given the number of proposed actions some prioritisation would be useful.
- It is unclear what the influence of the sub-regional Economic Development Strategy has been on the Framework.

The issue of transport infrastructure, congestion, levels of use of public transport and maintaining or improving current levels of access to public transport are all covered in some detail in the Framework. The timing of infrastructure provision and upgrading and the effectiveness of demand management measures and access to all modes of transport are clearly of fundamental importance not only to the deliverability of the framework but to the quality of life and quality of development of the sub-region. The SRDF is brave to raise the issue of demand management but it is unclear who will ultimately be responsible for taking action-especially at sub-regional level.

A5.3 *THE APPRAISAL PROCESS*

The appraisal to date has focused on the 'direction' of development proposed in the SRDF since it does not contain (and indeed is probably not intended in many cases to contain) sufficiently precise locational development detail for a more detailed assessment of the likely impacts of the SRDF.

The appraisal framework focuses on the extent to which the SRDF reflects, in a fashion appropriate to a sub-regional spatial planning document, the LSDC's Sustainable Development Framework for London and the Objectives of the London Plan. The appraisal has used a series of appraisal questions based on the LSDC framework and additional inputs form a range of London Stakeholder to "interrogate" the SRDF. The appraisal has not addressed specific concerning stakeholder issues the sub-region at this stage.

Table 1 below sets out the results of the initial appraisal. To help with the interpretation of findings, symbols have been used to summarise the main thrust of the appraisal, as follows:

- ✓ Overall impact influence likely to be positive
- ? Overall impact influence unclear
- × Overall impact influence likely to be negative
- ×× Clear, strong negative impacts
- Neutral

Table.1 Initial Appraisal of the West London SRDF

Key:

✓	= positive impact/influence
-	= neutral
?	= unclear impact/influence
X	= negative impact

	LSDC Framework Issue / Appraisal Criteria	SRDF Rating West London	Comments
1	Overall Objective		
1.1	<p>We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade-offs between competing objectives are unavoidable, these will be transparent and minimised. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the achievement of integrated environmental, economic and social development equally, minimising trade offs? (eg place SD as an overall objective of the framework and integrate it firmly in the vision for the sub regions development) • involve transparent processes in cases where trade-offs between competing objectives have been necessary? (eg does the document clearly indicate/document the trade-off processes involved in the development of the framework?) 	*/x	<p>The SRDF mentions sustainable development and sustainable growth in various contexts but gives no indication as to what a sustainable growth model for the sub-region would produce or what the challenges to such a development model are.</p> <p>NB. As with other SRDF's trade-offs are not dealt with. The SRDF does, however, raise issues of possible conflicts/issues for negotiation/evaluation, often at LDF/Community Strategy level.</p>
1.2	<p>Key Issue – Deprivation</p> <p>To What extent does the framework:</p> <ul style="list-style-type: none"> • address economic, health, social and environmental issues in areas of acute deprivation? (eg focus on areas suffering from acute deprivation in reference to indicators such as IMD rankings) • identify areas of deprivation within the sub-region or within communities of interest • involve people from areas of acute deprivation? (eg from areas suffering from acute deprivation in reference to indicators such as IMD rankings) • involve other people with expertise in deprivation issues? E.g. community welfare groups, social services 	x	<p>The discussion of issues relating to deprivation is at best superficial. No use is made of IMD data on other sources of evidence. It is not clear what the likely impact of this Framework will be on deprivation or how it will assist deprived communities.</p> <p>It is also unclear to what extent deprived communities or their representatives have been a part of any of the partnerships or stakeholder groups involved in the SRDF to date.</p>

1.3	<p>teams, education, health and livelihoods experts.</p> <p>Key Issue – Social Exclusion</p> <p>To what extent does the framework:</p> <ul style="list-style-type: none"> • promote social cohesion across the sub-region eg. Encourage cross-community working on planning and development issues, create facilities that serve the need of more than one grouping, foster the integration of marginalized groups into society. • address economic, social and environmental issues affecting individuals and communities within the sub-region suffering social exclusion? (<i>eg equality target groups – women, black and minority ethnic people, children and young people, the homeless, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups</i>) • involve individuals and communities suffering social exclusion in developing/commenting on the framework? (<i>eg equality target groups – women, black and minority ethnic people, children and young people, disabled people, lesbian, gay, bisexual and trans people, and people from different faith groups</i>) <p>involve other people with expertise in social exclusion issues? i.e. groups and individuals within the sub-region working with or representing excluded groups, minority groups etc, also experts/research bodies working on social exclusion in London.</p>	✘	<p>Social Exclusion is mentioned in Section 3 of the SRDF but this is as far as it goes. The Framework raises quite clearly the need for LDF's to address issues of social exclusion at local level, but appears not to view it as a relevant issue at sub-regional level. It provides no evidence to support this view.</p> <p>As noted in 1.2, it is unclear to what extent the views of the socially excluded have been represented within the partnership developing the Framework.</p>
2			
2.1	<p>Objectives, responsibility, targets, indicators. To what extent does the framework:</p> <ul style="list-style-type: none"> • establish clear and fully integrated economic, social and environmental objectives? • Contain explicit information on long, medium and short term targets/ goals. • specify responsibility for delivery of those objectives? • contain targets on those objectives? • include indicators to monitor progress towards those objectives/targets? 	✘	<p>The monitoring and evaluation framework for the SRDF is not set out in the current draft. Whilst targets relating to the London Plan are included in the document measurement of performance against these and other targets is not addressed.</p> <p>There is scope to add sub-regionally specific indicators/monitoring requirements – this should be done.</p>
3			
3.1	<p><i>Responsibility:</i> As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability. To what extent does the framework:</p>	✓/?	<p>The SRDF focuses on the sub-region and only explores relationships with other regions to a very limited extent. Links to both Central London, other regions of London, the Thames Corridor and other parts of the South-East could usefully be made, in greater detail. The Framework could also usefully reflect on what other plans/strategies</p>

	<ul style="list-style-type: none"> • account for and minimise the negative, and maximise the positive, impacts of proposals on people in the rest of the UK and beyond? <i>(eg explicitly consider potential impacts of the framework outside of the sub-region (regional, national and international))</i> • constitute best practice when compared to other approaches taken around the world? <i>(eg compare to for example Sustainable Seattle, work on the Sydney Olympics, information from the European Sustainable Cities website)</i> • make use of the best information available? <i>(eg review coverage of the Evidence Base and indicate where gaps exist and how these may be addressed for the future. Particular issues may relate to information on environmental conditions/performance, likely demographic trends, the effects of climate change, changes in technology and distribution of income etc)</i> • include an assessment of the wider impact of the framework, of implementation involving wider stakeholders, and of likely links to the rest of London and the UK 		<p>are saying about the sub-region.</p>
3.2	<p><i>Capability:</i> All of us – individuals, households, businesses, local and regional government, voluntary groups – will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote access to information, knowledge and support for all groups - individuals, households, organisations, government etc? • ensure proper provision of information on the Framework itself? • Include a clear information strategy that includes all groups and communities in the sub-region? • Address the information needs of people outside the sub-region. 	<p>?</p> <p>x</p> <p>x</p> <p>?</p>	<p>It is not clear to what extent best practise has informed the SRDF.</p> <p>The evidence base used for the SRDF is patchy – this may relate to the availability of baseline data for the sub-region – this is unclear. Core spatial and development data are supplied, data for other topics is more limited.</p> <p>No assessment appears to have been made of the wider impacts of the Framework.</p> <p>It is unclear from the draft SRDF used for this appraisal which consultation/communications processes will be used to ensure adequate access to information about the Framework in the sub-region. No indication is given regarding the Information Strategy for the SRDF.</p>
3.3	<p><i>Creativity:</i> We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective. To what extent does the</p>	<p>✓</p>	<p>In general the SRDF takes a long-term perspective on housing and other spatial development issues. It also contains a number of links/references to Mayoral Strategies and to the London Plan.</p>

3.4	<p>framework:</p> <ul style="list-style-type: none"> • establish mechanisms to promote effective decision-making? • set out a longer term perspective appropriate to the issue being addressed, to ensure future prosperity and quality of life? • involve new and creative ways to promote effective decision-making? • involve clear links between the long-term perspective and other long-term visions, documents, strategies etc? (eg the London Plan and other Strategies) <p><i>Ownership:</i> We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote civic participation, ownership and responsibility in the sub-region and more broadly in London through the involvement of different stakeholders in implementation of the Framework? • involve a diverse range of stakeholders? 	?/✓	The SRDF is quite explicit about the need for community involvement at the local level. It is unclear to what extent 'bottom-up' ownership of the SRDF is being pursued or has been a feature of the partnership to date.
4			
4.1	<p><i>Respect:</i> Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others. Does the framework:</p> <ul style="list-style-type: none"> • promote a culture of tolerance, fairness and respect for people and the environment taking into account key strengths and needs within the sub-region? • recognise diversity as a key strength? • Recognise the way which the framework may impact differently on differently groups within the sub-region. 	✓/?	<p>The SRDF explicitly recognises the importance of diversity for the sub-region's economy. It also recognises the need to address the issues of specific groups within society. Overall, however, the significance of diversity within this sub-region is not as strongly drawn out as might be expected.</p> <p>The impact of, and the opportunities offered by, the SRDF on different groups is not explored.</p>
4.2	<p><i>Safety:</i> Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote safety and reduce the threat and fear of crime? • Promote the creation of safer communities 	✓	Safety is mentioned – albeit briefly but will also be aspect of some of the SRG referred to in the text.
4.3	<p><i>Vibrancy:</i> Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will</p>	?/✗	The significance of different communities contributions to the distinctiveness of the sub-region is only poorly developed in the

	<p>be resolved as part of a transparent and participatory process. To what extent does the framework:</p> <ul style="list-style-type: none"> • promote the vibrancy and creativity of the sub-region and its communities • involve transparent and participatory processes to resolve conflicts? (eg citizens' panels, Planning for Real exercises, involvement of Local Strategic Partnerships etc) • provide local communities with opportunities to make inputs on issues that will increase their sense of place/positive feeling about the sub-region. 		<p>current draft. It does not appear to have had any influence on key spatial decisions. The contributions of local communities appears to have been left until the development of LDF's and community strategies.</p>
5			
5.1	<p><i>Environment:</i> We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links. Does the framework:</p> <ul style="list-style-type: none"> • protect and improve the natural and built environment? • support the objectives and implementation of the Mayor's environmental Strategies? • consider the state of the environment in the sub-region and priorities for environmental improvement? 	<p>?/x</p>	<p>The SRDF makes clear recommendations regarding principles and action points for LDF's that should help to ensure that the environmental impact of development at site level is minimised and opportunities for sustainable development policies and actions are taken up. The biggest picture is less directly addressed.</p> <p>The evidence base on the environment is weak. It is far from clear that the growth model that is advocated will lead to a higher quality environment and major issues such as air quality are not really addressed.</p> <p>This section on the environment contains a number of aspirational statements on issues such as biodiversity – these are not connected to targets, measures of impact etc and area of questionable value.</p>
5.2	<p><i>Resources:</i> We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste. Does the framework:</p> <ul style="list-style-type: none"> • Promote energy efficient buildings • promote the minimisation of pollution and the clean up of polluted areas in the sub-region • promote the most prudent and efficient use of resources? • support the objectives and implementation of the Mayor's Waste Strategy? 	<p>?</p>	<p>The SRDF makes quite clear statements on building design, low-carbon etc.</p> <p>However, It does not clearly address issues of resource efficiency or the sub-region's ecological footprint. The information on waste is a key example of areas where development seems likely to lead a worsening of the resource efficiency of the sub-region. Emissions from transport are another example.</p> <p>As with other SRDF's information on waste is 'on hold' pending new policy.</p>
6	Getting results		
6.1	<p><i>Progress:</i> We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London</p>	<p>✓</p>	<p>The issue of what would constitute progress in the sub-region is dealt with implicitly in the SRDF. In general, high standards are called for and the long-term prosperity of the sub-region is clearly a key objective.</p>

	<p>and beyond. Business transactions in London will be conducted to high ethical standards. Does the framework:</p> <ul style="list-style-type: none"> • promote local development that delivers wider economic, social and environmental objectives? • Promote development that addresses the employment and training needs of communities with the highest unemployment/ lack of skills in the sub region • promote development that builds the potential for future/long-term prosperity and quality of life via the policies and location of decisions it promotes? • Promote a balanced mix of housing and employment development in the sub-region that reflects the needs of all communities/groups 		<p>The need to create balanced communities, including mixed development is frequently mentioned. The issue of skills/training needs is not addressed in detail.</p>
6.2	<p><i>Innovation:</i> All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.</p> <ul style="list-style-type: none"> • promote investment and innovation as integral parts of balanced development of the sub-region? • Prevent the loss of indigenous businesses 	x/✓	<p>The question of innovation is not really addressed in the SRDF. More could be made of the role of the sub-region's Science and Business Parks in stimulating and attracting innovation.</p>
6.3	<p><i>Esteem:</i> All forms of work will be recognised and valued. Paid employment will be plentiful.</p> <ul style="list-style-type: none"> • promote investment and innovation as integral parts of balanced development of the sub-region? • Prevent the loss of indigenous businesses 	✓	<p>LDF's are recognised as the correct place for the analysis of local SME/businesses need and their role for the future. The SRDF recognises the importance of indigenous businesses.</p>
6.3	<p><i>Esteem:</i> All forms of work will be recognised and valued. Paid employment will be plentiful.</p> <ul style="list-style-type: none"> • promote employment for all? • recognise and value unpaid work? • involve the voluntary/community sector? • engage with the unpaid sector (eg the unemployed, young people etc)? 	✓/?	<p>The SRDF requires LDF's to address the role/contribution of social enterprises and the voluntary sector. However, the role of this sector across the sub-region is not addressed, in terms of its size/importance etc.</p>
6.4	<p><i>Access:</i> We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities. Does the framework:</p> <ul style="list-style-type: none"> • promote policies that address the provision of accessible facilities/local key services (including health services and childcare), food, green space, cultural/sporting/ • leisure activities, and other amenities? • address sub-regional priorities to provide access for all to good housing • promote the development of mixed use developments 	✓/?	<p>Access of all kinds is well explored in the SRDF.</p> <p>The issues of transport, demand management, promotion of public transport, parallel development of housing/commercial premises and transport are all mentioned.</p> <p>The provision of facilities and services to improve levels of access in terms of social, environmental and transport infrastructure is stressed.</p> <p>Access to housing – demand/need vs supply for key groups is not discussed in detail. Completion rates are recognised as an issue that may well affect delivery of needs in terms of affordable and decent housing and reduction of levels of overcrowding.</p>

	<p>which ensure good access to the above services and amenities?</p> <ul style="list-style-type: none"> • promote public transport • Involve communities/local residents in development of the framework • Involve communities/local residents in the implementation of the framework 		<p>Mixed-use development is promoted.</p> <p>The issue of access to food is not addressed nor is access to cultural leisure facilities except open/greenspace.</p> <p>As discussed elsewhere in this appraisal the role of local residents in not really addressed in the current draft of the SRDF.</p>
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