

City of London

Sustainability Appraisal

Scoping Report

Local Plan Review

Environmental Report

City Plan 2040 Proposed Revised Submission

July 2023



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1. Introduction

- 1.1. The City of London Corporation is re-consulting on the scope of its Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), formerly referred to as the Integrated Impact Assessment (IIA), as a result of the time that has passed since the IIA was last consulted upon in March-May 2021.
- 1.2. The SA/SEA provides an appraisal of the Corporation's Local Plan Review, referred to as the City Plan 2040, showing how well it performs against environmental, social and economic objectives. The Local Plan Review will be supported by an updated evidence base and informed by public engagement.
- 1.3. A number of significant developments have happened since the previous consultation rounds, which need to be considered as part of this Local Plan Review. This includes changes to the National Planning Policy Framework and planning legislation, the adoption of a new London Plan in 2021, the City Corporation's strong focus on the Destination City initiative to maintain its status as a global destination, and a commitment to achieve net zero emissions by 2040.
- 1.4. During the 2021 consultation, some issues were raised in relation to tall buildings, heritage matters and the effects of the COVID-19 pandemic. In response, key policy changes have since been proposed in the following areas: tall buildings, housing, offices, culture, and sustainability. The City Corporation also now has a Climate Action Strategy and the intention is for the City's Local Plan to better align with this Strategy, whilst also reflecting key evidence base updates.
- 1.5. The Local Plan Review will set out the City Corporation's vision, strategy, objectives and policies for planning in the City of London to 2040. It will provide a spatial framework which brings together and co-ordinates a range of plans and strategies prepared by the City Corporation, its partners and other agencies. It will take account of projected changes in the economy, employment, technology, population and transport demand seeking to maintain a high quality urban environment whilst protecting historic assets.

2. Purpose of Sustainability Appraisal

- 2.1. Under the amended Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents, it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)

(EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA Regulations remain in force and it is a legal requirement for the City Plan to be subject to SA and SEA throughout its preparation.

- 2.2. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidanceⁱ), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is henceforth being undertaken in the City of London. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.
- 2.3. Until now, Integrated Impact Assessment (IIA) was undertaken of the City Plan, which brings together SA/SEA, Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process. Due to the comments received on the previous consultation in 2021, the Corporation decided that separate standalone EqIA and HIA would be undertaken instead of incorporating these assessments into the IIA. Hence, the plan assessment is now referred to as SA/SEA.
- 2.4. Sustainability Appraisal is the process by which the Local Plan is tested to ensure that it will promote sustainable development in line with the National Planning Policy Framework (NPPF). The Sustainability Appraisal must meet the requirements of the SEA Regulations. The process takes account of social, environmental and economic aspects of sustainability.

Habitats Regulations Assessment

- 2.5. The requirement to undertake Habitats Regulations Assessment (HRA) of Development Plan Documents was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007ⁱⁱ. The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)'ⁱⁱⁱ (hereafter referred to as the 'Habitats Regulations'). When preparing the City Plan, the City of London Corporation is therefore required by law to carry out an HRA.
- 2.6. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain

whether it would adversely affect the integrity of that site.

2.7. The HRA has been undertaken separately but relevant findings will be reported in the SA Report.

3. Sustainability Appraisal process

3.1. The SA process is an iterative process which informs the development of plan policies considering reasonable alternatives and evaluating them to establish the most sustainable option for final policy.

3.2. The Scoping stage sets the context and baseline, identifies other relevant plans and programmes, defines the SA objectives and defines the methodological framework for the assessments.

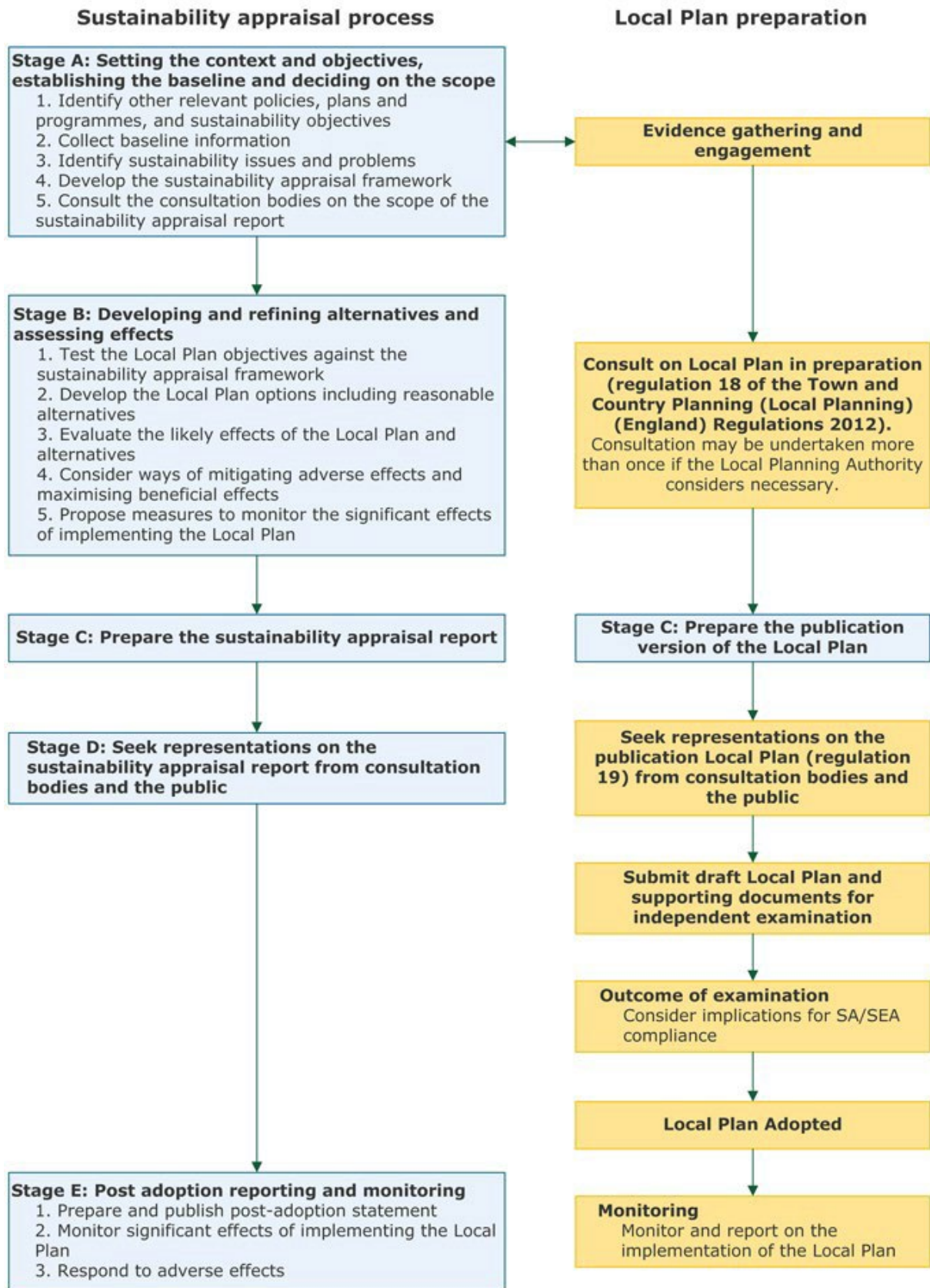


Fig 1: Sustainability Appraisal methodology

4. Stage A1 Other plans and programmes

4.1. The following plans and programmes provide the local, regional, national and international context within which the review of the Local Plan will sit. Implementation of certain aspects of these plans and policies will depend on the Local Plan. Therefore, it is essential that the SA takes account of these associated strategies in making assessments of the sustainability of the Local Plan Review. Appendix 1 includes an assessment of how these other plans and programmes will influence the development of the Local Plan Review and their SA implications.

4.2. Local Plans and Programmes – The Local Plans and Programmes include a comprehensive set of City of London Strategies which identify the direction the City Corporation intends to take on a range of issues. Environmental protection objectives are set out to improve the quality and quantity of open space and trees, provide opportunities for biodiversity enhancement in urban green spaces, built structures and the tidal Thames and address environmental protection through application of the waste hierarchy, reducing transport and building related emissions and avoiding land contamination. The City's Climate Action Strategy specifically seeks to: (1) achieve net zero carbon emissions from the Corporation's operations by 2027; (2) achieve net zero carbon emissions across the Corporation's investments and supply chain by 2040; (3) support the achievement of net zero for the Square Mile by 2040; and (4) invest £68m over the next six years to support these goals of which £15m is dedicated to preparing the Square Mile for extreme weather events. Climate resilience and flood risk are addressed through the identification of vulnerable areas and communities whose needs will need to be considered in the SA. A series of transport and environmental enhancement strategies outline the City's aspiration for the public realm.

- Carbon Options Guidance Planning Advice Note (2023)
- City of London Statement of Community Involvement 2023 (2022)
- City of London Policing Plan 2022-2025 (2022)
- City of London Statement of Licensing Policy 2022 (2022)
- Preventing Suicides in High Rise Buildings and Structures Planning Advice Note (2022)
- City of London Lighting Supplementary Planning Document (2022)
- City and Hackney Joint Strategic Needs Assessment City Supplement (2021)
- City of London Riverside Strategy (2021)
- City of London Contaminated Land Inspection Strategy 2021-2030 (2021)
- City of London Local Flood Risk Management Strategy 2021-2027 (2021)

- City of London Public Health Intelligence Strategy and Action Plan (2021)
- City of London Planning Obligations SPD (2021)
- City of London Visitor Destination Strategy 2019-23: COVID-19 Supplement (2020)
- Climate Action Strategy 2020-2027 (2020)
- Thermal Comfort Guidelines (2020)
- City of London Housing Strategy 2019-2023 (2019)
- City of London Cultural and Creative Learning Strategy 2019-23 (2019)
- City of London Transport Strategy 2019 (2019)
- City of London Air Quality Strategy 2019-2024 (2019)
- City of London Visitor Destination Strategy 2019-23 (2019)
- Safer City Strategic Plan 2019-2022 (2019)
- The City Cluster Vision 2019 (2019)
- City of London Sport and Physical Activity Strategy 2015-2020 (2019)
- City of London Road Danger Reduction and Active Travel Plan 2018-2023 (2018)
- City of London Cultural Strategy 2018-22 (2018)
- City of London Draft Local Implementation Plan 3 Delivery Plan 2019/2020-2021/2022 (2018)
- City of London Lighting Strategy (2018)
- Culture Mile Look and Feel Strategy (2018)
- City of London Education Strategy 2019-2023 (2018)
- City of London Skills Strategy 2019-23 (2018)
- City of London Corporate Plan 2018-23 (2018)
- City of London Delivery and Servicing Guidance (2018)
- City of London Archaeology and Development Guidance SPD (2017)
- City of London Air Quality SPD (2017)
- City of London Noise Strategy 2016-2026 (2017)
- City of London Historic Environment Strategy (2017)
- City of London Joint Health and Wellbeing Strategy, 2017-2020 (2017)
- City of London Biodiversity Action Plan 2021-2026 (2016)
- City of London Housing Asset Management Strategy 2015-2020 (2015)
- Cheapside & Guildhall Area Enhancement Strategy (2015)
- Riverside Walk Enhancement Strategy (2015)
- Barbican and Golden Lane Area Strategy (2015)
- City of London Local Plan (2015)
- City of London Open Spaces Strategy SDP 2021 (2015)
- City of London Thames Strategy SPD (2015)
- City of London Office Use SPD (2015)
- City of London Community Infrastructure Levy Schedule (2014)
- City of London Waste Strategy 2013-2020 (2014)
- West Smithfield Area Enhancement Strategy (2013)
- Liverpool Street Area Enhancement Strategy (2013)
- Bank Area Enhancement Strategy (2013)
- Fenchurch & Monument Area Enhancement Strategy (2013)
- City of London Tree Strategy (2012)

- City of London Protected Views SPD (2012)
- Conservation Area Strategy SPDs (various dates)
- Aldgate and Tower Area Strategy (2012)
- Chancery Lane Area Enhancement Strategy (2009)
- Fleet Street Courts and Lanes Design Strategy (2003)

4.3. Regional Plans and Programmes – The local strategies complement and provide local interpretation for London wide strategies which the Mayor and other statutory bodies have published. In addition to the topics covered by the City's plans and programmes, these strategies address issues such as the role of the River Thames, and the Central Activity Zone and London's heritage. The City Local Plan and SA will need to take account of the role that the City plays in addressing wider London Issues and aspirations. Neighbouring boroughs' planning policies identify cross boundary issues where co-operation will be needed.

- The Mayor's Transport Strategy 2021/22 (2022)
- The Mayor's Police and Crime Plan for London 2022-2025 (2022)
- Southwark Core Strategy and Saved Policies from the Southwark Plan (2022)
- Thames Estuary 2100 Plan (2022)
- Mayor's Strategy for Equality, Diversity and Inclusion (2022)
- London Plan Guidance (2022)
- London Plan 2021 consolidated with alterations since 2011 (2021)
- Health Inequalities Strategy Implementation Plan 2021-24 (2021)
- Westminster City Plan (2021)
- Lambeth Local Plan 2020-2035 (2021)
- Homes for Londoners: Affordable Homes Programme 2021-2026 (2021)
- London Urban Forest Plan (2020)
- London Recovery Programme (2020)
- Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits (2020)
- Hackney Local Plan 2033 (i.e. LP33) (2020)
- Freight and Servicing Action Plan (2019)
- Islington Local Plan Bunhill and Clerkenwell Area Action Plan (2019)
- Safeguarded Wharves Review 2018-2019 (2019)
- Vision Zero Action Plan (2018)
- Walking Action Plan (2018)
- Cycling Action Plan (2018)
- London Environment Strategy (2018)
- The London Health Inequalities Strategy (2018)
- The Mayor's Culture Strategy for London (2018)
- The Mayor's Economic Development Strategy (2018)
- Smarter London Together (2018)
- London Housing Strategy (2018)
- The Mayor's London Food Strategy (2018)

- The Mayor's Zero Carbon London: A 1.5°C Compatible Plan (2018)
- Skills for Londoners: A Skills and Adult Education Strategy for London (2018)
- Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy (2018)
- London Office Policy Review 2017 (2017)
- Camden Local Plan (2017)
- Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Mayor's Culture and Night-Time Economy SPG (2017)
- Thames River Basin Management Plan 2015 (2016)
- The Mayor's Central Activities Zine SPG (2016)
- Tower of London World Heritage Site Management Plan (2016)
- Mayor's Housing SPG (2016)
- The Mayor's Digital Inclusion Strategy (2015)
- London Infrastructure Plan 2050 (update report 2015)
- Cultural Tourism Vision for London 2015-2017 (2015)
- Mayor's Social Infrastructure SPG (2015)
- The Mayor's Character and Context SPG (2014)
- Accessible London: Achieving an Inclusive Environment 2014 (2014)
- Mayor's Sustainable Design and Construction SPG (2014)
- The Mayor of London River Action Plan (2013)
- London View Management Framework SPG (2012)
- London's World Heritage Sites - Guidance on settings SPG (2012)
- Green Infrastructure and Open Environments: The All London Green Grid (2012)
- The Mayor's Water Strategy (2011)
- The Mayor's Municipal Waste Management Strategy (2011)
- The Mayor's Business Waste Management Strategy (2011)
- Islington Core Strategy (2011) and Development Management Policies (2013)
- The Mayor's Air Quality Strategy (2010)
- Tower of London - Local Setting Study (2010)

4.4. National Plans and Programmes National and international Plans and programmes form the framework within which the regional and local plans operate and set strategic direction and targets

- National Planning Practice Guidance (NPPG) (live)
- Carbon Budget Delivery Plan (2023)
- Powering up Britain (2023)
- Levelling Up and Regeneration Bill (2022)
- Levelling Up the United Kingdom White Paper (2022)
- British Energy Security Strategy (2022)
- Historic England Advice Note 4 Tall Buildings (2022)
- The Cycling and Walking Investment Strategy Report to Parliament (2022)
- A Fairer Private Rented Sector White Paper (2022)

- National Planning Policy Framework (NPPF) (2021)
- The Energy Performance of Buildings Regulations (2021)
- Net Zero Strategy: Build Back Greener (2021)
- Environment Act 2021 (2021)
- The Industrial Decarbonisation Strategy (2021)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Heat and Buildings Strategy (2021)
- National Design Guide (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- Build Back Better: Our Plan for Growth (2021)
- UK Hydrogen Strategy (2021)
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Fire Safety Act 2021 (2021)
- Using the Planning System to Promote Health Weight Environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Building Safety Programme (2020)
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2019)
- Public Health England, PHE Strategy 2020-25 (2019)
- Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management (2nd Edition) (2019)
- BEIS Clean Growth Strategy (2019)
- Clean Air Strategy 2019 (2019)
- Resources and Waste Strategy for England (2018)
- The National Adaptation Programme 2018-2023 (2018)
- The Environment Agency's Approach to Groundwater Protection (2018)
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- The Conservation of Habitats and Species Regulations 2018 (2018)
- Housing White Paper: Fixing our Broken Housing Market (2017)
- Industrial Strategy: Building a Britain fit for the Future (2017)
- Historic England Good Practice Advice in Planning: The Setting of Heritage Assets (2017)
- Housing and Planning Act 2016
- Historic England Advice Note 2: Making Changes to Heritage Assets (2016)
- Infrastructure Act 2015
- Historic England Good Practice Advice in Planning – the Historic Environment in Local Plans (GPA1) (2015)
- Historic England Good Practice Advice in Planning – Managing significance in Decision-Taking in the Historic Environment (GPA2) (2015)
- National Planning Policy for Waste (2014)
- Growth and Infrastructure Act 2013

- Energy Act 2013
- The Carbon Plan – Reducing Greenhouse Gas Emission (2013)
- Localism Act 2011
- Fair Society, Healthy Lives, The Marmot Review (2010)
- Flood and Water Management Act 2010
- Climate Change Act 2008
- Planning Act 2008
- Planning and Compulsory Purchase Act 2004
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Wildlife and Countryside Act (as amended) 1981

4.5. International Plans and Programmes

- United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)
- EU Biodiversity Strategy to 2020 (2020)
- EU Environment Action Plan to 2030 (2020)
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
- The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232)
- United Nations Sustainable Development Goals (2015)
- UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997) and Paris Agreement 2015
- 2030 Agenda for Sustainable Development (2015)
- European Transport Policy: White Paper Roadmap to a Single European Transport Area (2011)
- Strategic Plan for Biodiversity 2011-2020, including Biodiversity Targets (2010)
- EU Sustainable Development Strategy Reviewed 2009 (2009)
- United Nations Declaration on Sustainable Development (the 'Johannesburg Declaration') (2002)
- EU Water Framework Directive 2000/60/EC and amendments
- European Landscape Convention 2000
- International Convention on Biological Diversity 1992
- Valetta Treaty 1992
- Habitats Directive 92/43/EEC
- UN Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') 1992
- European Convention for the Protection of the Architectural Heritage of Europe
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) 1979
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), The Athens Charter (1931)

and The Venice Charter on the Conservation and Restoration of Monuments and Sites (1964)

4.6. See Appendix 1 for analysis of the implications of these plans and programmes for Integrated Impact Assessment and for the development of the Local Plan.

5. Stage A2 Baseline information

5.1. The purpose of the baseline information is to establish the current state of the environment in the City encompassing any social, environmental and economic characteristics which are likely to be affected by the implementation of the Local Plan.

5.2. Information on historic and likely future trends will assist in identifying where there may be a need for a change in policy. Analysis of the likely evolution of these characteristics without the implementation of any new policies will form the "business as usual" scenario which will be assessed against other reasonable alternatives for policy.

5.3. The SEA Regulations list a number of elements that should be considered: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationships between these factors. This list incorporates health, equalities and habitats aspects therefore it is appropriate to use these topic headings to define the Integrated Impact Assessment baseline.

5.4. A summary of the baseline information utilising these headings is included in Appendix 2.

6. Stage A3 Sustainability issues and problems

6.1. The baseline information, analysis of trends against the SA objectives from the previous SA in 2015 and other evidence have been used to inform the identification of sustainability issues and problems which could be addressed through the Local Plan.

Economic issues

Employment

6.2. As set out in the baseline information, Arup's 'Future of Office Use' study^{iv} concludes that City-based office jobs, and office attendance, are expected to continue growing to pre-pandemic levels. Traditional-office based jobs are the dominant sector in the Square Mile, representing 59% (346,000) of all jobs in 2021. However, Emerging office-based firms are faster-growing with 41,600 new jobs between

2015 and 2021 compared to a 25% increase over the same period for traditional office-based jobs. Emerging office-based firms (information and communication and professional, scientific and technical activities) are tending to value different office space typologies including more agile working environments with lower workplace densities and higher-amenity offices.

- 6.3. The City is a compact central London district covering just over one square mile, which provides employment for over 591,000 people (BRES employment data) and contributes 4% of the UK's GVA^v. It is important that the employment space in the City keeps pace with the needs of businesses particularly in the face of changing work patterns.
- 6.4. In order to achieve economic growth and provide additional employment opportunities for a rising population in London and the South East, suitable flexible employment space will be needed to facilitate new and expanding businesses.
- 6.5. Current market projections suggest traditional office-based jobs across London are set to decline, owing to job losses in finance and public administration. However, information and communication jobs, real estate, and scientific and technical activities are all part of an emerging, office-based, projected growth market in London^{vi}. As such, the City's working population is predicted to increase by up to 66,000 over the period 2021-2041^{vii}.
- 6.6. To best avoid sustainability issues, the projected population growth should be facilitated without compromising the City's environment and heritage assets. In addition to offices, which are the predominant land use, complementary uses such as retail, hotels, health and leisure facilities must cater for the needs of workers as well as the 8,700 residents, 27,000 students and 7.8 million visitors per year.

Transport and movement

- 6.7. The baseline information identified that there is now additional public transport capacity within the City following the opening of the Elizabeth Line. However, overall activity on the underground remains below pre-pandemic levels but this is gradually increasing with time. The intensification of development densities may lead to congestion problems associated with delivery and servicing vehicles and pedestrian and cycle flows. Emissions associated with vehicle transport present a key challenge.
- 6.8. The majority of City workers commute using public transport from the rest of London and beyond, using the City's streets to complete their

journeys as pedestrians or cyclists. Increasing numbers are cycling, putting pressure on the City's cycling infrastructure. A major component of the traffic in the City consists of buses, taxis and delivery and servicing vehicles. Ensuring that the transport network can support the predicted growth in the City's working and resident populations is challenging. Provision of capacity for active transport modes such as cycling and adequate highway space for essential vehicles will present potential conflicts. A particular issue is the servicing of new tall buildings in the highly constrained street environment of the City Cluster. This should be achieved whilst improving air quality, minimising energy consumption and improving the health of the City's communities.

Utilities infrastructure

- 6.9. Baseline information identifies the need for energy infrastructure to reduce carbon emissions; sewerage infrastructure to reduce pollution of the Thames; SuDS to reduce flood risk for overloaded sewers and water conservation measures to respond to regional water stresses.
- 6.10. Provision of capacity in the utility infrastructure network in terms of electricity, gas, water supply, sewerage, decentralised energy networks and telecommunications is essential for the functioning of the City. Increased development and changes in working practices will impact on the type and quantum of utility infrastructure required. Demand management must make a major contribution to reducing the environmental impact of energy and water use and minimising pressure on the sewerage network.
- 6.11. The timely implementation of utility upgrades, new infrastructure such as heating and cooling networks, and SuDS and drainage infrastructure, requires co-ordination at a scale that is wider than individual development sites. This should be achieved without any negative impacts on the environment, and where possible incorporating environmental improvements such as reduced flood risk and improved air quality.

Digital connectivity

- 6.12. Baseline information identifies the need for digital technologies to keep pace with new work styles and business requirements.
- 6.13. During the period of the Local Plan to 2040 there is likely to be a further increase on employment floorspace and changes in the way people work and live. This will include more flexible and agile/hybrid working with an increased reliance on digital technology. The challenge is to provide suitable digital connectivity for the changing

needs and work patterns of workers, residents and visitors without increasing energy consumption or carbon emissions. In addition this should be achieved without compromising the City's historic environment, public realm or security.

Security

- 6.14. Baseline information identifies that the City has remained safe from terrorist incidents in the last 10 years but that continued vigilance is necessary.
- 6.15. The high profile nature of City premises, businesses and events means that terrorism and security are constant threats. It is important that the City remains an open and welcoming place and that necessary security infrastructure, principally in buildings but also in the public realm is kept as unobtrusive as possible.

Environmental issues

Open spaces and biodiversity

- 6.16. The baseline information has identified that opportunities for biodiversity have increased through the development of green roofs and walls and that river water quality should improve due to the Thames Tideway Tunnel. Positive actions to encourage priority species may be needed to improve their numbers.
- 6.17. Although the City is densely developed, open spaces form an important function for relaxation and recreation. They also provide pockets of space for wildlife, forming corridors for the movement of species, improving air quality and providing urban cooling benefits. The River Thames, which is a Site of Metropolitan Importance for Nature Conservation, brings wider benefits for migrating birds and fish species. There is intense pressure on all the City's open spaces particularly at lunchtimes, but flexible working patterns could result in this being spread more evenly throughout the day. New development provides an opportunity to create additional open space, which should be designed for multiple uses and resilient to future climate conditions.

Air quality

- 6.18. Baseline information has identified poor air quality as a significant issue for the City due to vehicle emissions and pollution associated with demolition and construction works. However, baseline information has also shown an overall reduction in PM10 and NO₂ over the last seven years.

6.19. The City of London, along with the rest of central London is an Air Quality Management Area for particulates (PM10) and oxides of nitrogen (NOx). Traffic, construction activity and combustion based heating systems all contribute to the poor air quality. Some of this can be tackled locally but the City is also impacted by poor air quality generated elsewhere and there needs to be wider action particularly to address the impacts of transport related emissions. Demand management and the promotion of cleaner vehicles must form part of the solution to this issue. Traffic reduction is the preferred option with zero emission vehicles the ultimate aim for all remaining road transport.

Soil and water quality, water resources and flood risk

6.20. Baseline information identifies that prevention measures should keep the City free from contaminated land and that river water quality should improve when the Thames Tideway Tunnel is complete. SuDS and other water conservation measures should assist in providing protection from flood risk but some areas of the City may become more vulnerable to flooding as the climate changes.

6.21. There is the potential for land contamination in the City as a result of historic activity although there is no current danger to health from contaminated land. It is necessary to continue to monitor development sites to ensure that no new source-receptor contamination pathways are created by new development. Water pollution is a legacy of London's combined sewer infrastructure which discharges dilute sewage into the Thames, during periods of heavy rainfall. The Blackfriars Combined Sewer Outflow (CSO) is one of 32 CSOs that will be captured by the Thames Tideway Tunnel. Along with the rest of south east England the City is an area of water stress. Water conservation is an important consideration and this can be coupled with sustainable drainage (SuDS) to make better use of the water resources available to the City. The City's 2017 Strategic Flood Risk Assessment (SFRA)^{viii} provides an update to the 2012 SFRA, particularly in relation to the assessment of climate change. It identifies that limited areas of the City are at risk of river, surface water and sewer flooding. An updated version of the SFRA will be published this year.

Climate change mitigation and adaptation.

6.22. Baseline information identifies the need for low energy infrastructure if the City is to make a significant contribution to carbon emission reduction targets. Although the City is at low risk of flooding, further areas may be at risk as the climate changes.

6.23. The City is a high energy user, where low and zero carbon energy sources only contribute a small proportion to this energy consumption. Evidence^{ix} suggests that expansion of low or zero carbon district heating and cooling networks, from combined cooling heating and power (CCHP) facilities, is an effective way of reducing carbon emissions in high density urban environments. Demand management and other low carbon energy sources will be important, in order to avoid an overall increase in carbon emissions, given the projected increase in office floorspace during the period of the Local Plan.

6.24. Resilience to the effects of climate change, which could include overheating, flood risk and more extreme weather events, must be incorporated into the design of buildings and public spaces if the City is to remain comfortable in future climate conditions.

Waste

6.25. Baseline information indicates that the City will continue to rely on waste sites beyond the City's boundaries for management of its waste arisings. Circular economy principles, waste minimisation and on site waste management will become increasingly important in future.

6.26. Economic growth and the projected increase in working and resident population have the potential to create higher levels of waste. The City has one waste transfer station but no means of treating waste or extracting value from it. Therefore all the waste generated in the City must be transported elsewhere for management. Waste Planning Authorities elsewhere are increasingly limiting their provision of waste sites to accommodate their own waste arisings with diminishing levels of waste imports. Circular economy principles of keeping resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life, will need to be addressed. This may require additional infrastructure and policy drivers to improve the City's self-sufficiency with respect to waste minimisation and management, albeit this will be very challenging in such a compact and densely developed urban area.

Heritage assets (architectural and archaeological)

6.27. Baseline information shows that protection is in place for the City's conservation areas, listed buildings and historic parks and gardens through the NPPF, the London Plan 2021 and the City of London's adopted Local Plan.

- 6.28. As the historic core from which London developed the City has a wealth of heritage assets including listed buildings, archaeological sites, scheduled monuments, historic parks and gardens and conservation areas. Pressure for development is intense therefore it is important that these heritage assets contribute to the functioning of the City, through the conversion of underused space to satisfy commercial or social needs. This should be achieved without detracting from the significance of the historic features either within the buildings or in their surrounding settings.
- 6.29. The heritage assets within the City form part of a wider network of listed buildings and conservation areas, which illustrate London's rich history, extending into neighbouring boroughs and beyond. The Local Plan should respond to the future plans for cultural and heritage assets within and outside the City, for example considering the impact of increased visitor numbers and access routes through the City. Development within the City should not detract from the historic significance and setting of assets elsewhere. Of particular importance in this context is the Tower of London World Heritage Site which lies just beyond the City's boundary to the east. Part of the Local Setting of the Tower lies within the City.
- 6.30. The City of London Corporation recently launched a City-wide 'Destination City' programme, the overall aim of which is to transform the Square Mile's cultural and leisure offer, creating a leading destination for UK and international visitors, workers and residents to enjoy.

Landscape – protected views

- 6.31. Baseline information shows that protection is in place for important views which could be affected by City development.
- 6.32. Views of landmark buildings such as St Paul's Cathedral and the Tower of London should be protected alongside modern City developments. Additional tall buildings will be needed to satisfy the need for additional employment space however these buildings should be located so that they do not detract from the protected views of the City's landmark buildings from viewing points within and beyond the City's boundaries.

Social issues

Population

- 6.33. Baseline information shows that although the resident population is rising, second homes and investment properties form an increasing

proportion of the total housing stock. City residents are generally in good health with higher than average levels of educational attainment. The impact of the referendum vote to leave the EU and changes in working practices may affect the growth rates of the City's working population.

6.34. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important fraction. Provision of some services for the 8,600 people whose usual residence is in the City and the 1,714 with second homes in the City (source: 2021 Census data) entails partnership working with neighbouring boroughs, to ensure that cost effective health, education and social services can be provided. The resident population will increase over the period of the plan but the balance between permanent residents and those with second homes for weekday occupation will need to be monitored so that suitable services can be provided. The working population is set to increase by up to 176,000 between 2016 and 2040 driven by economic growth and the attractiveness of the City of a business location.

Equality

6.35. Baseline information shows that deprivation levels in the boroughs surrounding the City are falling. There is a widening gender imbalance in City employment levels with 64% male and 36% female in 2022 compared to 61% male and 39 % female in 2011, although the age profile is broadening with higher proportions of older workers.

6.36. The City is surrounded by less affluent areas some of which have high levels of deprivation. The City can be a catalyst for improvements in surrounding areas through the provision of local jobs and employment training, skills transfer to surrounding areas and development of affordable housing either within the City or in areas within close commuting distance of the City.

6.37. Changes in working patterns and greater flexibility may influence the future demographic profile of the City's workers.

Housing

6.38. The City has a relatively low population of permanent residents (8,600 source: 2021 Census data). This is supplemented by 1,713 weekday residents with second homes in the City. This equates to 22.4% of the total housing stock. The number of second homes in the city saw an increase of 22.3% from 2011, whilst the resident population increased by 16.2%. This demonstrates the trend towards second homes and investment properties in the City, as well as population

increase in the City of London.

- 6.39. Future housing need in the City must take account of demographic growth, migration and the impact of welfare reforms, providing suitable housing some of which may be on City Corporation owned estates outside the City.
- 6.40. The vast majority of the City's workforce does not live in the City. The provision of suitable residential accommodation elsewhere in London and beyond is essential for the City's competitiveness and economic growth. In particular the supply of affordable homes for workers on low and middle incomes is a key issue which must be addressed across London. The Local Plan can play a minor role in addressing this problem but co-operation with other local authorities will be essential.

Health and wellbeing

- 6.41. Baseline information shows that in 2021 56.6% of City of London residents described their health as "very good", increasing from 55.0% in 2011. Those describing their health as "good" rose from 31.1% to 31.2%, whilst 62% of City workers describe their health as "very good" and a high proportion describe their health as "good." The health of the City's workers and residents is generally better than the London and national averages.
- 6.42. Particular health issues in the City include stress and mental health problems, alcohol, drugs, smoking and air quality related health issues. The promotion and facilitation of healthy lifestyles for the City's workers, residents and visitors must sit alongside the provision of health facilities for these communities. The health facilities at St Bartholomew's hospital have recently undergone transformation as a cardiac and cancer centre of excellence, and will continue to play a major regional role.

Education and skills

- 6.43. Baseline information shows that the educational attainment of City residents and workers is above the London and national averages.
- 6.44. Educational achievement amongst City residents and workers is relatively high with City businesses demanding a highly skilled workforce. In order to retain this workforce, many of whom have global options, the City must remain an attractive working environment offering professional development opportunities and training. The City has a significant student population including a

specialist medical school with a presence at St Bartholomew's Hospital, performing arts at the Guildhall School of Music and Drama in the Barbican and a number of London campuses of regional and international universities and educational institutions. .

Crime and antisocial behaviour

- 6.45. Baseline information shows that overall crime rates have risen in the City since 2011, with the overall crime rate in City of London in April 2023 at 851 crimes per 1,000.
- 6.46. It is difficult to compare this with other local authority areas or London as a whole, as crime rates are expressed as a proportion per 1,000 resident population and this does not reflect the significant size of the City's working day population of 590,000 workers. If the crime rate is expressed as a proportion of the working population, the rate in the City would be 1.44 crimes per 1,000 workers, which compares to the overall London rate for 2022 of 95 per 1,000 residents. On this basis, crime levels in the City are low making it one of the safest places in the country.
- 6.47. The priorities for the City of London Policing Plan include road safety, public order offences, antisocial behaviour, economic crime and fraud. The design of buildings and the public realm can assist in reducing the potential for crime. Co-operation between the planning and licensing functions of the City Corporation can also assist in reducing the potential for anti-social behaviour associated with the growing night time economy in the City.

Culture and leisure

- 6.48. Baseline information shows that in 2014, visits to attractions in the City totalled approximately 6.5 million, with over 10 million total visitors. This saw an increase in 2021 with visits totalling 7.8 million. This is in spite of the COVID-19 pandemic and suggests a level of resilience in culture and leisure tourism, and that such commodities are highly valued following the pandemic.
- 6.49. Leisure and culture form an important part of the balance required between work and personal life for the City's communities and provide potential benefits for London as a whole. The City provides numerous opportunities for fitness, sport and recreation both in sports facilities and in informal settings such as the City's open spaces.
- 6.50. Alongside its status as a financial centre, the City Corporation's aspiration is for the City to strengthen its role as a destination,

increasing footfall and diversifying the City's economy. As mentioned previously, the City of London Corporation has launched a 'Destination City' programme, the intention of which is to improve the cultural and visitor offer of the City. Visitor numbers are likely to increase from the current levels, with consequential needs for facilities including hotels, restaurants and rest facilities to serve their needs.

7. Stage A4 Sustainability Appraisal framework

7.1. The SA framework is the process that will be used to test emerging Local Plan policy options to ensure that they have positive impacts economically, environmentally and socially. Particular attention will be given to the impact on health and equality alongside the economic, social and environmental sustainability impacts. The assessment will be carried out using the objectives and criteria shown in Table 1.

Table 1 Sustainability Appraisal objectives and criteria

Objective 1: Economic Growth

To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City's status as a leading international financial and business centre.

Criteria
Global financial centre, financial and business services, tech and IT, supporting businesses – hotels, retail.
1.1 Will the policy provide the business environment to attract and retain global financial, business services and TMT companies?
1.2 Will the policy provide employment in supporting businesses and services providing a range of job opportunities?
1.3 Will the policy enable the City to grow and compete with other global financial and business centres?
1.4 Will the policy help to sustain and increase the City's contribution to the London and UK economies?
1.5 Will the policy facilitate state-of-the-art digital connectivity and sustainable utility infrastructure to support the business City?

Criteria

1.6 Will the policy aid the City's recovery following the COVID-19 pandemic?
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Objective 2 Built environment and public realm

To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities.

Criteria
Built environment public realm, digital connectivity, well designed cities, supporting infrastructure.
2.1 Will the policy provide an attractive and inclusive public realm?
2.2 Will the policy encourage improvements to the public realm?
2.2 Will the policy secure high-quality design that enhances the built environment and character of the City?
2.3 Will the policy enable the efficient use of land?
2.4 Will the policy enable accessibility for everyone?
2.5 Will the policy enable high speed digital connectivity, particularly following the COVID-19 pandemic and increase in hybrid working?
2.6 Will the policy facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes?
2.7 Will the policy enable effective enforcement of planning conditions to reduce adverse impacts of development?
2.8 Will the policy sustain and enhance the positive contribution made by built heritage to the City's environment?

Objective 3 Safe environment and crime reduction

To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.

Criteria
Crime reduction, antisocial behaviour, fear of crime, security, anti-terrorism
3.1 Will the policy reduce crime and fear of crime?
3.2 Will the policy tackle anti-social behaviour through design, use and management of buildings and spaces?
3.3 Will the policy provide effective security features within buildings including high profile sites?
3.4 Will the policy provide effective security in the public realm beyond individual buildings?

Objective 4 Heritage assets

To conserve or enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.

Criteria
Historic environment, conservation areas, listed buildings, scheduled monuments, historic parks and gardens, world heritage sites, archaeological remains
4.1 Will the policy conserve or enhance the significance of heritage assets (listed buildings, conservation areas, historic street furniture, scheduled monuments, historic parks and gardens, historic trees, world heritage sites and archaeological remains) and their settings in and around the City?
4.2 Will the policy preserve archaeological remains and other heritage assets in situ and allow access for viewing?
4.3 Will the policy encourage investigation, recording, publication and archiving of historic buildings, archaeological monuments and remains?
4.4 Will the policy protect the views of historically important landmarks and buildings?
4.5 Will the policy improve understanding and appreciation of heritage assets including those that are concealed from view?
4.6 Will the policy successfully balance access, climate adaptation and mitigation; and digital connectivity requirements with the need to conserve and enhance heritage assets?

Objective 5 Waste management

To decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings.

Criteria
Decoupling waste generation from economic growth – maximise efficiency, water efficiency, circular economy.
5.1 Will the policy reduce waste, including construction and deconstruction waste, food and household waste?
5.2 Will the policy reduce the overall waste arising per capita?
5.3 Will the policy reduce hazardous waste arisings from the City?
5.4 Will the policy enable waste to be managed further up the waste hierarchy?
5.5 Will the policy make efficient use of resources including water?
5.6 Will the policy facilitate disposal or treatment of waste within or close to the City?
5.7 Will the policy facilitate sustainable waste transport?
5.8 Will the policy promote circular economy principles?
5.9 Will the policy encourage the transport of materials by rail or river where possible?
5.10 Will the policy safeguard existing wharves, particularly Walbrook Wharf?
5:11 Will the policy maximise use of materials at their highest utility and value?

Objective 6 Environmental protection

To maximise protection and enhancement of the natural environment.

Criteria
Air quality, water quality and resources, land contamination, light and noise.
6.1 Will the policy improve air quality?
6.2 Will the policy improve water quality and prevent contamination?
6.3 Will the policy improve water quality by reducing diffuse urban pollution?
6.4 Will the policy make efficient use of water resources and reduce demand on these resources?
6.5 Will the policy encourage use of existing resources?
6.6 Will the policy mitigate and adapt to climate change impacts?
6.7 Will the policy reduce waste water volumes and the risk of sewer flooding, for example through the use of SuDS?
6.8 Will the policy prevent land contamination and facilitate clean-up of existing contaminated land?
6.9 Will the policy result in minimisation of noise and light pollution and nuisance?
6.10 Will the policy provide suitable levels of daylight and sunlight for the City's buildings and open spaces?

Objective 7 Climate change mitigation and resilience

To mitigate climate change, assist in maintaining energy security and promote climate change resilience.

Criteria
Climate change mitigation, carbon emission reduction, energy security, climate change resilience, urban heat island.
7.1 Will the policy improve sustainability, energy efficiency and/or reduce carbon emissions associated with buildings or transport?
7.2 Will the policy enable the use of low and zero carbon technologies including renewables and decentralised energy networks, and the 'Square Mile' net carbon neutral by 2040?
7.3 Will the policy improve energy security for City premises?
7.4 Will the policy make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)?
7.5 Will the policy improve the microclimate and ameliorate the heat island effect so as to make the City more resilient to extreme weather?
7.6 Will the policy assist in reducing vulnerability to flood risk within and beyond the City (e.g. by supporting TE2100 plan)?
7.7 Will the policy champion sustainable growth and help to retain the City's role as a leading centre for green and sustainable investment and growth?
7.8 Will the policy advocate the importance of green spaces and urban greening as natural carbon sinks?
7.9 Will the policy promote retrofit and refurbishment for existing buildings and minimise carbon emissions of existing buildings and materials?

Objective 8 Open spaces

To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.

Criteria
Open space provision, design for inclusivity and accessibility, multiple uses.
8.1 Will the policy protect existing open spaces?
8.2 Will the policy increase the amount of publicly accessible open space?
8.3 Will the policy improve the quality and design of existing open space?
8.4 Will the policy enhance tranquillity of open spaces?
8.5 Will the policy encourage multiple uses for open spaces such as sport, recreation, relaxation, food growing, public and private events (subject to local byelaws)?
8.6 Will the policy ensure that open spaces reflect and interpret the local distinctiveness of an area, particularly in historic places?
8.7 Will the policy provide new or improve existing amenity space?
8.8 Will the policy improve access for all to the City's public realm and open spaces?

Objective 9 Biodiversity and urban greening

To improve opportunities for biodiversity and increase the provision of natural environments.

Criteria
Habitats and species, Natura 2000 sites outside the City.
9.1 Will the policy increase protection and result in net gain in biodiversity?
9.2 Will the policy enhance the River Thames as a Site of Metropolitan Importance for Nature Conservation?
9.3 Will the policy affect any other Sites of Importance for Nature Conservation?
9.4 Will the policy protect existing trees and increase tree planting?
9.5 Will the policy increase green roofs, green walls and soft landscaping and lead to their positive management for biodiversity?
9.6 Will the policy affect any Natura 2000 sites?

Objective 10 Transport and movement

To improve the safety, sustainability, efficiency and attractiveness of transport; minimising the negative environmental and health impacts of travel in, to, from and through the City.

Criteria
Efficient public transport, low emissions CO2, NOx, particulates, air quality exposure, road safety, promote active transport, delivery vehicles, reduce need to travel.
10.1 Will the policy reduce the need to travel?
10.2 Will the policy improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)?
10.3 Will the policy encourage active transport (walking and cycling)?
10.4 Will the policy improve the accessibility of the City's transport network?
10.5 Will the policy encourage safe, convenient, accessible, economic and efficient public transport?
10.6 Will the policy reduce the negative impacts of servicing and freight?
10.7 Will the policy make better use of the river for transport?
10.8 Will the policy reduce harmful emissions from transport?

Objective 11 Housing

To deliver an environment that meets the needs and expectations of residents.

Criteria
Housing, residential amenity
11.1 Will the policy address housing challenges for City residents and workers? (availability and affordability)
11.2 Will the policy contribute to meeting housing needs in London?
11.3 Will the policy protect or improve residential amenity?
11.4 Will the policy contribute to meeting the different needs of different groups such older people and students?

Objective 12 Social and cultural facilities

To provide suitable social and cultural facilities for all the City's communities

Criteria
Vibrant social environment, leisure, cultural opportunities
12.1 Will the policy help to provide a vibrant leisure, culture and retail destination that offer unique experiences at different times of the day and week?
12.2 Will the policy protect and enhance social, community and cultural facilities which meet the expectations of City workers and residents?
12.3 Will the policy encourage a vibrant social environment which attracts workers and visitors to the City whilst respecting the needs of residents?
12.4 Will the policy decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport?
12.5 Will the policy enhance cultural opportunities attracting workers and global businesses to the City?
12.6 Will the policy ensure the City's historic environment continues to contribute significantly to social and cultural life in the Square Mile?

Objective 13 Health

To improve the health of the City's resident, worker and student populations

Criteria
Healthy lifestyles, health facilities, access to healthy food, mental health.
13.1 Will the policy enable and encourage healthy lifestyles – exercise, active travel, healthy food, social interaction etc.?
13.2 Will the policy maintain or improve access to health facilities?
13.3 Will the policy reduce exposure to poor air quality?
13.4 Will the policy provide opportunities for stress reduction?
13.5 Will the policy reduce problems associated with alcohol, smoking and drug use?
13.6 Will the policy reduce intrusive noise levels?
13.7 Will the policy improve health and wellbeing through the provision of cultural facilities and activities?
13.8 Will the policy have negative health impacts beyond the City?

Objective 14 Education

To enable excellence in education for all the City's communities.

Criteria
Education facilities preschool to higher education and professional development.
14.1 Will the policy provide educational facilities for nursery pre-school and school age groups, to meet the needs of residents?
14.2 Will the policy encourage crèche/ nursery facilities to accommodate workers' children?
14.3 Will the policy encourage appropriate further and higher education opportunities to support local, London wide and national needs?
14.4 Will the policy provide professional training opportunities for the City's workforce?
14.5 Will the policy provide training and job opportunities for City residents and City Fringe residents?

7.2. Sustainability Appraisal will be carried out to ensure that sustainability is considered.

7.3. The following assessment key will be used to assess options for policy and the wording of emerging draft policy in order to determine the most appropriate policy option and identify the need for mitigation of any predicted consequences of application of the emerging policies. Comments will be included to highlight the significant effects of the policy options in terms of direct or indirect effects, whether effects are permanent or temporary, cumulative impacts and timescales. (Short term 1-3 years, medium term 3-10 years, long term more than 10 years).

Colour	Impact
↑	Significant positive impact
↑	Positive impact
↕	Uncertain impact
↑↓	Both positive and negative impacts
↓	Negative impact
↓	Significant negative impact
-	No impact

Row	Definition
↑	One arrow = Local impact within the City
↑↑	Two arrows = Regional impact
↑↑↑	Three arrows = National or international impact

SA objectives compatibility matrix

SA objective														
1) Economic growth														
2) Attractive environment	√	√												
3) Crime reduction	√	√	√											
4) Historic assets	X (1)	√	-	√										
5) Waste	X (5)	√	-	-	√									
6) Environmental protection	√	√	-	√	√	√								
7) Climate	√	√	-	√	√	√	√							
8) Open space	√	√	-	√	-	√	√	√						
9) Biodiversity	-	√	-	-	-	√	√	√	√					
10) Travel and transport	X (4)	√	√	√	√	√	√	√	-	√				
11) Housing	X (4)	√	√	-	-	√	-	X (2)	-	√	√			
12) Social and cultural facilities	√	√	√	√	-	√	-	√	-	X (3)	√	√		
13) Health	√	√	√	-	√	√	√	√	√	-	√	√	√	
14) Education	√	√	√	-	-	-	√	√	-	√	√	√	√	√
	1	2	3	4	5	6	7	8	9	10	11	12	13	14

√ Compatible

× Conflict

- No impact

- (1) The protection of heritage assets could constrain opportunities for additional development but on the other hand an attractive environment including heritage assets could be a factor that helps to attract and retain businesses
- (2) Provision of amenity space for housing development could impact on public open spaces
- (3) Major cultural facilities are likely to put greater pressure on transport infrastructure including the street environment
- (4) The provision of additional office space to meet the need for economic growth is likely to put greater pressure on transport infrastructure, including the street environment
- (5) If additional housing is provided close to commercial buildings, this will introduce residential amenity issues that might jeopardise the ability to expand or redevelop commercial premises.
- (6) Economic growth could result in greater waste generation however application of circular economy principles could assist in addressing this.

8. Stage A5 Consultation on the scope of the SA

8.1. The SEA Regulations require statutory environmental consultation bodies to be consulted on the scope and level of detail of the information contained within the Scoping Report. The relevant consultation bodies are:

- Environment Agency
- Natural England
- Historic England.

8.2. It is also considered that key stakeholders should have the chance to comment on the draft Scoping Report. Those being consulted are set out below:

- Mayor of London

- Neighbouring Boroughs
- City and Hackney Health and Wellbeing Board
- City of London Police

ⁱ Ministry of Housing, Communities and Local Government (last updated 31 December 2020) Planning Practice Guidance. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)

ⁱⁱ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 SI No. 2007/1843

ⁱⁱⁱ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)

^{iv} Arup and Knight Frank (2023). Future of Office Use.

^v Office for National Statistics (2022). Business Register and Employment Survey – provisional results 2021. (see <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/businessregisterandemploymentsurveybresprovisionalresults/previousReleases>)

^{vi} Arup & City of London Corporation (2023) Future of Office Use Summary Report. (see <https://democracy.cityoflondon.gov.uk/documents/s187327/20230609%20-%20CoL%20Future%20of%20Office%20Use%20-%20Final%20Summary%20Report%20-%20For%20Issue.pdf>)

^{vii} GLA (2022). London labour market projections 2022 – Interim update. (see: <https://data.london.gov.uk/blog/london-labour-market-projections-2022-interim-update/>)

^{viii} City of London (2017). Strategic Flood Risk Assessment. (see <https://www.cityoflondon.gov.uk/services/environmental-health/climate-action/flooding/strategic-flood-risk-assessment?pageIndex=3>)

^{ix} Community Energy – Urban planning for a low carbon future TCPA and CPHA 2008.