

City of London

City Plan 2036

Integrated Impact Assessment

Draft City Plan 2036 consultation version

November 2018

ED-SUS9



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1. Non-Technical Summary

IIA Scope

The Integrated Impact Assessment for the City incorporates: Sustainability Appraisal (SA), Health Impact Assessment screening (HIA) and Equalities Impact Assessment screening (EqIA). The assessment covers the requirements for Strategic Environmental Assessment seeking to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation. This non-technical summary outlines the information required in environmental reports (Schedule 2 Environmental Assessment of Plans and Programmes Regulations 2004)

1) The City Plan 2036 and its relationship with other plans and programmes

The City Plan 2036 will replace the adopted Local Plan 2015 as the primary policy document for Planning in London's central business district. It will guide development in the City through planning policies, contributing to the overall objectives of a flourishing society, thriving economy and outstanding environments. As the plan for spatial development in the City it must take account of a wide range of other plans and programmes at international, national, regional and local level. These other plans and programmes include environmental targets which the City Plan 2036 must contribute to realising.

2) Current state of the Environment

Economy – As a globally important business district the City's predominant land use is offices. The area contributes to local, regional, national and international prosperity and relies on wider transport, utility and housing infrastructure to ensure its success. The City's workforce is predicted to grow by approximately 100,000 during the period of the plan. Without a plan the City would be unable to provide suitable office space to accommodate this increased workforce, taking account of new styles of working and accompanying infrastructure requirements.

Environment – Covering one square mile, the City has numerous pockets of open space and is bounded to the south by the River Thames site of metropolitan importance for nature conservation. In common with the rest of central London it has poor air quality, is a major contributor to carbon emissions and generates significant quantities of waste which must be transported elsewhere for treatment. Without a plan the pressure for development to accommodate additional workers could result in encroachment into the City's valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Lack of planning for transport, waste and air quality would result in degradation of the environment within and beyond the City. Planning for altered weather patterns as a result of climate change will become increasingly important during the plan period.

Social – The City has a low resident population with around 8,000 people living in the City and a high proportion of second homes. Over 480,000 people work in the City many of whom commute daily from a wide area to access workplaces, although working patterns are changing. The resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health and wellbeing of the City's workers and residents could be compromised if insufficient recreation, relaxation and health facilities were

developed. Without changes to the adopted Local Plan the City’s aspiration to develop Culture Mile around the Barbican Centre would be less likely to progress.

3) Environmental characteristics of areas likely to be affected

As a high-density urban environment the City and surrounding areas suffer from poor air quality, urban heat island effect, noise and have a high potential for land and water pollution as a result of contaminated water run-off. Wider initiatives on air and water quality such as the London Ultra Low Emission Zone and the Thames Tideway Tunnel will improve some aspects but the City’s Local Plan is an essential element in implementation of these initiatives within the City.

4) Designated Areas

There are no designated European sites within the City of London boundary but there are two which lie wholly or partly within a 10km buffer area:

- Epping Forest SAC
- Lea Valley SPA and Ramsar site

A separate Habitats Regulation Assessment Screening has been carried out which concludes that *“the City of London Draft Local Plan ‘City Plan 2036’ is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA”*.

5) Environmental protection objectives

The IIA framework includes a review of other plans and programmes, identification of sustainability issues and problems, assessment of policy options and draft policies against a series of social, environmental and economic IIA objectives which include health and equalities objectives. Detailed objectives and criteria (para 3.5) were subject to consultation at scoping stage and were used to assess the impacts of the draft plan.

6) Significant Effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City’s IIA objectives showed general agreement between the IIA aspirations and the objectives of the plan. This assessment assisted in strengthening the City Plan 2036 objectives, further promoting sustainability through the Outstanding Environments objective and heritage protection through the Key City Places objective.

The assessment of the draft City Plan policies against the IIA objectives demonstrates that the impact of the plan will be largely positive as summarised below.

Parameter	Effect of draft City Plan 2036 (significant effects are marked in bold text)
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna. Significant positive impacts on local biodiversity should result from implementation of the open spaces and green infrastructure policies.

Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health. Significant positive impacts on health and environmental protection will result from the healthy and inclusive City policies
Soil, Water and Air	Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement. Policies for the Thames riverside and the air quality, and contaminated land and water quality will have significant positive impacts on soil, water and air.
Climatic factors	Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City's carbon emissions. Flood Risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate. No significant climate impacts were identified from the implementation of the plan due to the small geographic area covered
Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2036 policies including safe and secure City, visitors arts and culture, open spaces. The City's Key Areas of Change policies reinforce this generating significant local positive impacts.
Cultural heritage and Landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from distant viewing points. Significant positive impacts on cultural heritage will result from culture mile, Smithfield and Barbican area policies

Summary of the impacts of draft City Plan 2036 policies against IIA objectives

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Contribute to a Flourishing Society																
S1	Healthy & Inclusive City	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
S2	Safe & Secure City	Green	Blue	Green	Orange	Orange	Orange	Orange	Blue	Orange	Blue	Green	Orange	Green	Orange	Blue
S3	Housing	Blue	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Green	Green	Orange	Orange	Orange	Green
Support a Thriving Economy																
S4	Offices	Green	Blue	Orange	Blue	Yellow	Blue	Blue	Orange	Orange	Blue	Yellow	Orange	Orange	Green	Green
S5	Retail	Green	Green	Blue	Blue	Blue	Blue	Blue	Orange	Orange	Blue	Blue	Green	Orange	Orange	Green
S6	Culture, Visitors Night Economy	Green	Green	Green	Green	Blue	Blue	Blue	Green	Green	Blue	Blue	Green	Green	Green	Green
S7	Smart Utilities & Infrastructure	Green	Green	Green	Blue	Green	Orange	Green	Orange	Orange	Green	Orange	Orange	Orange	Orange	Orange
Shape Outstanding Environments																
S8	Design	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Green	Orange	Green
S9	Vehicle Transp. Servicing	Blue	Green	Green	Orange	Blue	Orange	Blue	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange
S10	Walking Cycling Healthy Streets	Blue	Blue	Green	Blue	Orange	Green	Green	Green	Orange	Blue	Orange	Orange	Green	Orange	Green
S11	Historic Environment	Blue	Green	Orange	Green	Orange	Orange	Orange	Orange	Green	Orange	Orange	Green	Orange	Green	Blue
S12	Tall Buildings	Yellow	Green	Green	Green	Orange	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Green
S13	Protected Views	Yellow	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
S14	Open Space Green Infrastructure	Green	Green	Blue	Blue	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green
S15	Climate resilience Flood Risk	Green	Green	Orange	Blue	Orange	Green	Green	Blue	Green	Orange	Green	Green	Green	Orange	Orange
S16	Circular Economy and Waste	Green	Green	Orange	Orange	Orange	Green	Green	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange
Key Areas of Change																
S17	Thames policy Area	Green	Green	Blue	Blue	Green	Green	Blue	Green	Green	Blue	Orange	Green	Green	Orange	Orange
S18	Blackfriars	Green	Green	Blue	Green	Blue	Green	Blue	Green	Green	Blue	Orange	Green	Orange	Orange	Orange
S19	Pool of London	Green	Green	Blue	Green	Blue	Green	Blue	Green	Green	Blue	Blue	Green	Orange	Green	Orange
S20	Aldgate & Tower	Green	Green	Blue	Orange	Blue	Blue	Blue	Blue	Blue	Orange	Blue	Orange	Orange	Orange	Orange
S21	City Cluster	Green	Blue	Green	Green	Orange	Blue	Orange	Orange	Orange	Blue	Orange	Orange	Orange	Green	Orange
S22	Fleet Street	Green	Green	Green	Blue	Orange	Orange	Orange	Green	Green	Blue	Orange	Orange	Orange	Orange	Orange
S23	Smithfield & Barbican	Green	Green	Blue	Green	Blue	Blue	Blue	Green	Green	Green	Blue	Blue	Blue	Green	Green
S24	Culture Mile	Green	Green	Blue	Green	Orange	Orange	Orange	Green	Green	Green	Blue	Blue	Blue	Green	Green
S25	Smithfield	Green	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
S26	Liverpool Street	Green	Green	Blue	Orange	Blue	Orange	Orange	Orange	Green	Green	Orange	Green	Green	Orange	Green
Implementation																
S27	Planning contributions	Green	Green	Green	Orange	Orange	Orange	Green	Orange	Orange	Green	Green	Orange	Orange	Green	Orange

7) Mitigation measures

A number of uncertainties were identified and assessment tables (Appendix 5) show what mitigation could be used to deal with these uncertainties. For example:

Mitigation proposed in IIA	How addressed in Local Plan
Flourishing Society	
<ul style="list-style-type: none"> Inclusiveness in play facilities and areas should be promoted 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses. 	<ul style="list-style-type: none"> Dealt with elsewhere in the draft Plan, albeit no specific reference to these uses. Further consideration will be given to this in the light of consultation feedback.
<ul style="list-style-type: none"> Introduce consistency of approach on over concentration of student housing, hotels and short lets. 	<ul style="list-style-type: none"> Policy wording is consistent, albeit not very detailed. Further consideration will be given to this in the light of consultation feedback.
Thriving Economy	
<ul style="list-style-type: none"> Designs of new office and retail development will be key to their sustainability 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Policy needs to define what types of “meanwhile uses” would be acceptable 	<ul style="list-style-type: none"> Proposed mitigation considered to be too prescriptive because the acceptability of different meanwhile uses will vary according to site conditions and location. Further consideration will be given to this in the light of consultation responses.
Outstanding Environments	
<ul style="list-style-type: none"> A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible 	<ul style="list-style-type: none"> Will be addressed at next stage following adoption of the City’s Transport Strategy
<ul style="list-style-type: none"> Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate. 	<ul style="list-style-type: none"> Dealt with elsewhere in the draft Plan so not included at this stage. Further consideration will be given to this in the light of consultation responses.
<ul style="list-style-type: none"> Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Reference should be made to other historic assets not just archaeology in flood risk & SuDS policy 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Safeguards should be included to ensure that on-site waste treatment facilities do not cause disturbance to neighbouring uses 	<ul style="list-style-type: none"> Will be addressed at next stage in the light of consultation feedback
Key Areas of Change	
<ul style="list-style-type: none"> Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan. 	<ul style="list-style-type: none"> No further mitigation required.
<ul style="list-style-type: none"> Identification of heritage assets in the Thames Policy Area is recommended 	<ul style="list-style-type: none"> Incorporated into draft Plan

The IIA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the IIA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan. Where mitigation measures have not already been incorporated they will be considered alongside consultation responses.

8) Reasons for selecting alternatives, assessment method and difficulties encountered

In developing the City Plan 2036, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement

Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses. One of the main difficulties encountered is the uncertainty surrounding the UK's decision to leave the EU.

The objectives of the City Plan 2036 could be achieved through different policy options in some cases. Reasonable alternatives were evaluated for protection of offices, balance of land uses between commercial, housing retail hotels and other uses, infrastructure and security, river related uses and river transport, hotels and business accommodation, historic environment, tall buildings and views protection, energy & CO2 emissions, air quality, transport, waste, flood risk, open spaces, retail, housing numbers, location and tenure, social and community infrastructure.

The outcome of this assessment was used to identify the preferred options to take forward into policy for the draft City Plan 2036. Reasons for choosing the preferred option and rejecting other options have been included in this report (Section 5.5).

9) Monitoring

A monitoring framework will be developed to monitor the significant effects of implementing the City Plan 2036. This will ensure that where uncertainties exist any unintended adverse effects are picked up quickly. The monitoring framework will be issued at Publication Stage (Reg 19) and finalised on adoption of the City Plan 2036.

How to comment

City Plan 2036

Have your say on the new Local Plan for the City of London.

The City of London Corporation is consulting on its draft Local Plan which sets out the future development of the Square Mile. The Local Plan contains planning policies for the City of London looking forward to 2036 and provides guidance on what types of development and activities are likely to take place over the plan period.

We are keen to hear your views on a wide range of important planning issues facing the City. The consultation period will start on the 12th of November 2018 and run until the 28th of February 2019.

The draft City Plan 2036 will be available to view in the City's libraries as well as the Planning Reception Area at Guildhall. There will also be several events and drop-in sessions with display material and officers in attendance to answer questions.

The City Plan 2036 is accompanied by an Integrated Impact Assessment and Habitats Regulation Assessment Screening. We welcome your comments on these assessments.

For more information visit our website: www.cityoflondon.gov.uk/cityplan2036 or phone Adrian Roche on 0207 332 1846.

To be kept updated on the City's consultations please email localplan@cityoflondon.gov.uk to be added to the City Plan's mailing list.

2. Introduction

2.1. Scope of the IIA (SA, SEA, HIA, EqIA)

- 2.1.1. This Integrated Impact Assessment Report for the emerging City Plan 2036 incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment, Health Impact Assessment (HIA) screening and Equalities Impact Assessment (EqIA) screening. The assessment procedure is an iterative process which evaluates the social, economic and environmental impacts of implementation of the proposed City Plan 2036. This report accompanies the draft City Plan 2036 (Regulation 18) public consultation and will be amended to reflect any further changes to the plan prior to adoption.
- 2.1.2. This report provides details of the assessment process to date, including the scoping stage - setting the context and objectives, establishing the baseline and deciding on the scope; the assessment stage – developing and refining alternatives and assessing effects. The findings of the IIA and how this has influenced the draft City Plan 2036 are set out along with the next steps which will ensure that any subsequent changes are assessed and mitigation and monitoring is put in place.

2.2. The draft City Plan 2036

- 2.2.1. The new Local Plan, called City Plan 2036, will set out the City Corporation's vision, strategy and objectives for planning for the next 20 years, together with policies that will guide future decisions on planning applications. Once adopted, the new City Plan 2036 will replace the current City of London Local Plan which was adopted in January 2015.
- 2.2.2. The objectives of the City Plan 2036 promote economic, environmental and social benefits for the City's geographic area and its wider area of influence:
- **Flourishing Society** - To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.
 - **Thriving Economy** - To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.
 - **Outstanding Environments** - To shape the future City, ensuring that it is physically well connected and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets
 - **Key Areas of Change** - To ensure that the challenges facing the Key Areas for Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural and creative facilities and distinguishing the City from other global centres
- 2.2.3. In order to achieve these objectives, the City Plan 2036 sets out policies covering the City's primary land uses: offices, retail, housing, visitor and community facilities, night-time economy, transport, open spaces and public realm. The City's policy approach to design, historic environment, tall buildings and protected views and the environmental challenges of climate change, urban greening, air quality and waste are specified, with the aim of maintaining a healthy and inclusive City that is safe and secure.

- 2.2.4. Despite its limited geographic area, covering one square mile, some parts of the City will experience more change than others during the lifetime of the plan. The City's aspirations for these Key Areas of Change are described along with the City's interaction and influence on neighbouring boroughs.
- 2.2.5. Review of the adopted Local Plan began in 2015. An Issues and Options consultation was carried out in September 2016. Consultation responses, emerging evidence, IIA and government guidance have shaped the evolution of the draft City Plan 2036 which will undergo further consultation in November 2018 (regulation 18) and prior to submission (2019) before examination and adoption (2020).

2.3. Policy context

- 2.3.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on a Draft Local Plan (Regulation 18), producing a Publication Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).
- 2.3.2. The National Planning Policy Framework (July 2018) sets out the requirement for local plans to *be prepared with the objective of contributing to the achievement of sustainable development*. This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).
- 2.3.3. The NPPF sets out the role of strategic policies in Local Plans to “...to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
- a) *housing (including affordable housing), employment, retail, leisure and other commercial development;*
 - b) *infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
 - c) *community facilities (such as health, education and cultural infrastructure); and*
 - d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*
- 2.3.4. To assist in the development of sustainable Local Plans the NPPF requires that “*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).*”
- 2.3.5. The Mayor's London Plan (March 2015) is the spatial development strategy for the whole of Greater London. Local Plans within London must be in general conformity with the London Plan. The London Plan recognises the key economic role that the City plays in London's prosperity, its position at the heart of the Central Activity Zone (CAZ) and its responsibility to protect and enhance key historic landmarks.

2.3.6. Review of the London Plan is currently underway, with the Mayor publishing a Draft London Plan in December 2017. Account has been taken of the emerging policies in the Draft London Plan, although these have no statutory weight at present. The Draft London Plan will be the subject of an Examination in Public during the first half of 2019.

2.4. Structure of this report

2.4.1. Sections 1 and 2 of this report provide a non-technical summary and an introduction to the process and the City Plan 2036. Section 3 outlines the methodology used in the IIA, section 4 sets out the sustainability context and highlights the sustainability issues and problems that the City faces, section 5 demonstrates the likely impacts of implementation of the City Plan 2036 and section 6 shows how the IIA has shaped the plan. The remainder of the report identifies possible mitigation measures and discusses monitoring of the plan's impacts. A series of appendices provide full details of each stage.

2.4.2. Table 1 shows the requirements of the SEA Directive and where each element is covered in this report.

Table 1 Requirements of the SEA Directive

SEA Requirement	Where covered in IIA Report (page number/appendix)
Preparation of an environmental report	IIA Report Oct 2018
a) Contents, plan objectives & relationship with other plans & programmes	Section 4.1 and Appendix 1 Other Plans and Programmes
b) Current state of the environment & evolution without a plan	Section 4.2 and Appendix 2 Baseline information
c) Characteristics of areas likely to be significantly affected	Section 4.2 and 4.3
d) Existing environmental problems	Section 4.3
e) Environmental protection objectives	Section 3.5 Stage A Scoping
f) Likely significant effects of implementation of the Plan	Section 5 and Appendix 5 IIA Assessment draft City Plan 2036
g) Mitigation measures	Section 7
h) Reason for selecting alternatives	Section 5.5
i) Monitoring proposed	Section 8

Method of assessment appropriate to the plan stage	
Consultation Scoping	Appendix 3 IIA Scoping consultation
Consultation Draft Plan	This document to accompany consultation on the draft City Plan 2036
Cross boundary impacts	
Impact of IIA on Plan	Section 6
Adoption Statement	
Monitoring framework	
Quality Assurance	

2.5. How to comment on this report

2.5.1. This IIA report has been issued for consultation alongside the draft City Plan 2036 (reg 18) consultation from 12th of November 2018 and run until the 28th of February 2019. For more information visit our website: www.cityoflondon.gov.uk/cityplan2036 or phone Adrian Roche on 0207 332 1846.

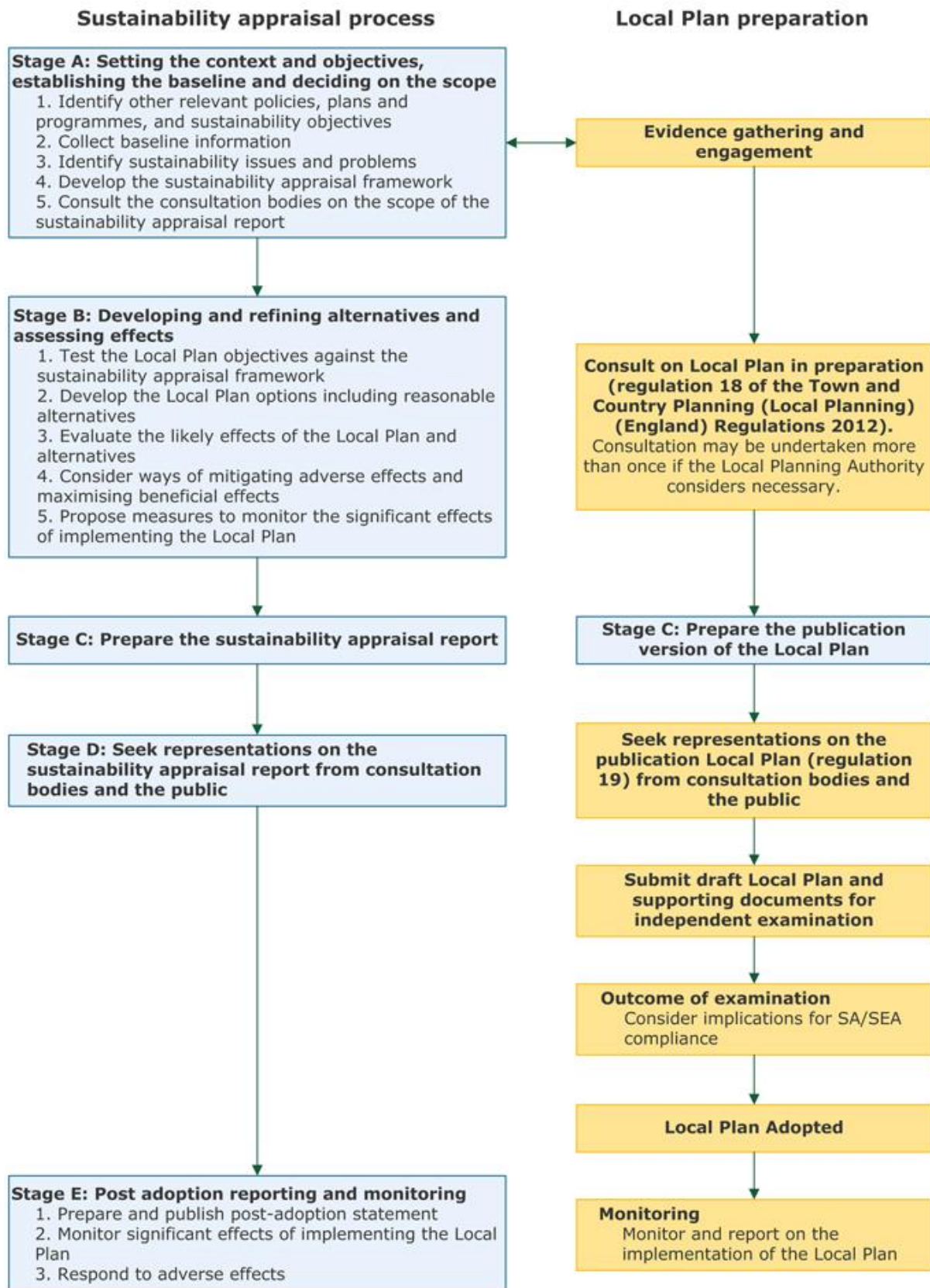
3. Approach to IIA

3.1. Stages in plan-making

3.1.1. The Integrated Impact Assessment process is an iterative process which influences the development of the plan aiming to avoid any unintended consequences when the plan is implemented.

3.1.2. Fig 1 shows the relationship between the stages in plan making and the Sustainability Appraisal process. This methodology has been adapted to incorporate Health Impact Assessment and Equality Impact Assessment screening

Fig 1 – Relationship between plan making and sustainability appraisal



3.2. Sustainability Appraisal

3.2.1. The sustainability appraisal of the City Local Plan 2036 has been carried out through an iterative process whereby alternative options and draft versions of the plan have been assessed against a series of IIA objectives. These objectives cover economic, social and environmental outcomes for the City and are accompanied by criteria which assist in evaluating whether implementation of the plan would result in detrimental impacts. The objectives were derived through a collaborative process involving specialists from a range of disciplines within the City Corporation and were informed by the review of other Plans and Programmes (appendix X) and consultation with statutory consultees

3.3. Health Impact Assessment Screening

3.3.1. A Health Impact Assessment screening was carried out through the inclusion of Objective 13 *Improved Health*. Any adverse impacts identified through this screening would be assessed through a separate full Health Impact Assessment.

3.4. Equalities Impact Assessment Screening

3.4.1. An Equalities Impact Assessment screening was carried out through the inclusion of Objective 15 *Equalities and inclusion*. Any adverse impacts identified through this screening would be assessed through a separate full Equalities Impact Assessment.

3.5. Stage A Scoping

3.5.1. At the IIA Scoping stage, which was carried out in 2016, a series of other plans and programmes relevant to the development of the City Plan 2036 was identified. This is a live list and has been updated as new strategies and policies are implemented at a national, regional and local level. Appendix 1 provides the most up to date version of the other plans and programmes list.

3.5.2. The sustainability objectives of these other plans and programmes, along with an analysis of the sustainability issues and problems facing the City, provided the basis for development of a series of IIA objectives and criteria for the assessment of policies. The IIA objectives and criteria were subject to professional scrutiny by City Corporation experts to ensure that they reflect an appropriate balance between economic, environmental and social aspirations for the City. Table 2 shows the final objectives for economic, environmental and social development of the City.

3.5.3. Baseline information for this IIA built on the monitoring evidence from the adopted Local Plan and other evidence studies to provide a snapshot of the current conditions highlighting any apparent trends.

3.5.4. Statutory consultees were invited to comment on the scope of the IIA (Feb 2016) leading to some alterations to the objectives and criteria. A summary of their responses and how the City Corporation has taken them into account can be found in Appendix 3.

Table 2 IIA Objectives for the City of London

Objective	Criteria
<p>1) Economic growth</p> <p>To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City's status as leading international financial and business centre.</p>	<p>Global financial centre, financial & business services, tech & IT, supporting businesses – hotels, retail.</p> <p>Will the policy provide the business environment to attract and retain global financial, business services and TMT companies?</p> <p>Will the policy provide employment in supporting businesses and services providing a range of job opportunities?</p> <p>Will the policy enable the City to grow and compete with other global financial and business centres?</p> <p>Will the policy help to sustain and increase the City's contribution to the London and UK economies?</p> <p>Will the policy facilitate state-of-the-art digital connectivity and utility infrastructure to support the business City?</p>
<p>2) Attractive built environment and public realm</p> <p>To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities.</p>	<p>Built environment public realm, digital connectivity, well designed, smart cities, supporting infrastructure.</p> <p>Will the policy provide an attractive public realm?</p> <p>Will the policy secure high-quality design that enhances the built environment and character of the City?</p> <p>Will the policy enable the efficient use of land?</p> <p>Will the policy enable accessibility for everyone?</p> <p>Will the policy enable high speed digital connectivity?</p> <p>Will the policy facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes?</p> <p>Will the policy enable effective enforcement of planning conditions to reduce adverse impacts of development?</p> <p>Will the policy sustain and enhance the positive contribution made by built heritage to the City's environment?</p>

Objective	Criteria
<p>3) Safe environment and crime reduction</p> <p>To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.</p>	<p>Crime reduction, antisocial behaviour, fear of crime, security, anti-terrorism</p> <p>Will the policy reduce crime and fear of crime?</p> <p>Will the policy tackle anti-social behaviour through design, use and management of buildings and spaces?</p> <p>Will the policy provide effective security features within buildings including high profile sites?</p> <p>Will the policy provide effective security in the public realm beyond individual buildings?</p>
<p>4) Heritage Assets</p> <p>To conserve or enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.</p>	<p>Historic environment, conservation areas, listed buildings, scheduled monuments, historic parks and gardens, world heritage sites, archaeological remains</p> <p>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?</p> <p>Will the policy preserve archaeological remains and other historic assets in situ and allow access for viewing?</p> <p>Will the policy encourage investigation, recording, publication and archiving of historic buildings, archaeological monuments and remains?</p> <p>Will the policy protect the views of historically important landmarks and buildings?</p> <p>Will the policy improve understanding and appreciation of heritage assets including those that are concealed from view?</p> <p>Will the policy successfully balance access, energy efficiency and digital connectivity requirements with the need to conserve and enhance heritage assets?</p>

Objective	Criteria
<p>5) Improved Waste management</p> <p>To decouple waste generation from economic growth enabling a circular economy¹ in the City that minimises waste arisings.</p>	<p>Decoupling waste generation from economic growth</p> <p>materials efficiency, water efficiency, circular economy.</p> <p>Will the policy reduce waste, including construction and deconstruction waste, food and household waste?</p> <p>Will the policy enable waste to be managed further up the waste hierarchy?</p> <p>Will the policy make efficient use of resources including water?</p> <p>Will the policy facilitate disposal or treatment of waste within or close to the City?</p> <p>Will the policy facilitate sustainable waste transport?</p> <p>Will the policy provide opportunities for businesses to benefit from the circular economy?</p> <p>Will the policy encourage the transport of materials by rail or river where possible?</p> <p>Will the policy safeguard existing wharves, particularly Walbrook Wharf?</p> <p>Will the policy reduce the overall waste arising per capita?</p> <p>Will the policy reduce hazardous waste arisings from the City?</p>

¹ A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

Objective	Criteria
<p>6) Improved environmental protection</p> <p>To maximise protection and enhancement of the natural environment.</p>	<p>Air quality, water quality and resources, land contamination, light & noise.</p> <p>Will the policy improve air quality?</p> <p>Will the policy improve water quality and prevent contamination?</p> <p>Will the policy reduce waste water volumes and the risk of sewer flooding through the use of SuDS?</p> <p>Will the policy prevent land contamination and facilitate clean-up of existing contaminated land?</p> <p>Will the policy result in minimisation of noise and light pollution and nuisance?</p> <p>Will the policy maintain access to day-light for the City's buildings and open spaces?</p> <p>Will the policy improve water quality by reducing diffuse urban pollution?</p> <p>Will the policy make efficient use of water resources and reduce demand on these resources</p>
<p>7) Climate change mitigation and resilience</p> <p>To mitigate climate change, assist in maintaining energy security and promote climate change resilience.</p>	<p>Climate change mitigation, carbon emission reduction, energy security, climate change resilience, urban heat island</p> <p>Will the policy improve energy efficiency or reduce carbon emissions associated with buildings or transport?</p> <p>Will the policy enable the use of low and zero carbon technologies including decentralised energy networks?</p> <p>Will the policy improve energy security for City premises?</p> <p>Will the policy make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)?</p> <p>Will the policy improve the microclimate and ameliorate the heat island effect?</p> <p>Will the policy assist in reducing vulnerability to flood risk within and beyond the City (e.g. by supporting TE2100 plan)?</p>

Objective	Criteria
<p>8) Improved Open Spaces</p> <p>To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.</p>	<p>Open space provision, design for inclusivity and accessibility, multiple uses.</p> <p>Will the policy protect existing open spaces?</p> <p>Will the policy increase the amount of publicly accessible open space?</p> <p>Will the policy improve the quality and design of existing open space?</p> <p>Will the policy enhance tranquillity of open spaces?</p> <p>Will the policy encourage multiple uses for open spaces such as sport, recreation, relaxation, food growing, public and private events (subject to local byelaws)?</p> <p>Will the policy ensure that open spaces reflect and interpret the local distinctiveness of an area, particularly in historic places?</p> <p>Will the policy provide new or improve existing amenity space?</p> <p>Will the policy improve access for all to the City's public realm and open spaces?</p>
<p>9) Improved Biodiversity and Urban Greening</p> <p>To improve opportunities for biodiversity and increase the provision of natural environments.</p>	<p>Biodiversity, habitats and species</p> <p>Will the policy increase protection and improve opportunities for biodiversity in particular black redstarts, sparrows, bats and stag beetles?</p> <p>Will the policy enhance the River Thames as a Site of Metropolitan Importance for Nature Conservation? (e.g. through the provision of roosting structures for birds and bats)</p> <p>Will the policy affect any other Sites of Importance for Nature Conservation?</p> <p>Will the policy protect existing trees and increase tree planting?</p> <p>Will the policy increase tree planting, green roofs, green walls and soft landscaping and lead to their positive management for biodiversity?</p> <p>Will the policy affect any Natura 2000 sites?</p>

Objective	Criteria
<p>10) Transport & Movement</p> <p>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.</p>	<p>Efficient public transport, low emissions CO2, NOx, particulates, air quality exposure, road safety, promote active transport, delivery vehicles, reduce need to travel.</p> <p>Will the policy reduce the need to travel?</p> <p><i>Will the policy improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)?</i></p> <p><i>Will the policy encourage active transport (walking and cycling)?</i></p> <p>Will the policy encourage safe, convenient, accessible, economic and efficient public transport?</p> <p>Will the policy reduce the negative impacts of servicing and freight?</p> <p>Will the policy make better use of the river for transport?</p> <p><i>Will the policy reduce harmful emissions from transport?</i></p>
<p>11) Housing</p> <p>To deliver an environment that meets the needs and expectations of residents.</p>	<p>Housing, residential amenity</p> <p>Will the policy address housing challenges for City residents and workers? (availability and <i>affordability</i>)</p> <p>Will the policy contribute to meeting housing needs in London?</p> <p>Will the policy protect or improve residential amenity?</p>
<p>12 Social and cultural facilities</p> <p>To provide suitable social and cultural facilities for all the City's communities</p>	<p>Vibrant social environment, leisure, cultural opportunities</p> <p>Will the policy protect and enhance social, community and cultural facilities which meet the expectations of City workers and residents?</p> <p>Will the policy encourage a vibrant social environment which attracts workers to the City whilst respecting the needs of residents?</p> <p><i>Will the policy decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport?</i></p> <p>Will the policy enhance cultural opportunities attracting workers and global businesses to the City?</p> <p>Will the policy ensure the City's historic environment continues to contribute significantly to social and cultural life in the square mile?</p>

Objective	Criteria
<p>13) Improved Health</p> <p>To improve the health of the City's resident, worker and student populations</p>	<p>Healthy lifestyles, health facilities, access to healthy food, mental health.</p> <p>Will the policy enable and encourage healthy lifestyles – exercise, healthy food, social interaction etc.?</p> <p>Will the policy maintain or improve access to health facilities?</p> <p>Will the policy reduce exposure to poor air quality?</p> <p>Will the policy provide opportunities for stress reduction?</p> <p>Will the policy reduce problems associated with alcohol and smoking?</p> <p>Will the policy reduce intrusive noise levels?</p> <p>Will the policy improve health and wellbeing through the provision of cultural facilities and activities?</p> <p>Will the policy have negative health impacts beyond the City?</p>
<p>14) Education</p> <p>To enable excellence in education for all the City's communities.</p>	<p>Education facilities preschool to higher education and professional development.</p> <p>Will the policy provide educational facilities for nursery pre-school and school age groups, to meet the needs of residents?</p> <p>Will the policy encourage crèche/ nursery facilities to accommodate workers' children?</p> <p>Will the policy encourage appropriate further and higher education opportunities to support the needs of City businesses and residents?</p> <p>Will the policy provide professional training opportunities for the City's workforce?</p> <p><i>Will the policy provide training and job opportunities for City residents and City Fringe residents?</i></p>
<p>15) Equality and inclusion</p> <p>To enable social and economic inclusion in and around the City for workers resident and visitors</p>	<p>Equality, social integration and wellbeing, poverty reduction, opportunity for all.²</p> <p><i>Will the policy contribute to the elimination of unlawful discrimination, harassment & victimisation?</i></p> <p><i>Will the policy advance equality of opportunity between people who share a protected characteristic³ and those who don't?</i></p>

² Assessment should consider equality duties as applicable to a range of factors including: *employment opportunities, the public realm and open spaces, social community and cultural opportunities and facilities, education and health facilities, transport, housing (including affordable housing) digital inclusion, community safety.*

³ Protected characteristics: Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity (parenthood), race, religion or belief, sex, sexual orientation.

Objective	Criteria
	<p><i>Will the policy foster good relations between people who share a protected characteristic and those who don't?</i></p> <p><i>Will the policy reduce economic inequality for individuals and communities in and around the City?</i></p>
Key	<i>Equality Impact Assessment (EqIA) screening criteria</i>
	Health Impact Assessment (HIA) screening criteria
	All criteria are important as Sustainability Appraisal (SA) criteria

3.5.5. This assessment framework evaluates policy options and draft policies against these objectives using the following key (table 3). This demonstrates the expected scale of all impacts for each option or draft policy.

Table 3 IIA Assessment framework

	Impact of implementing policy	Response to IIA assessment
↑	Significant positive impact	Consider whether further enhancement is possible
↑	Positive impact	Consider whether further enhancement is possible
↕	Uncertain impact	Consider policy wording changes and/ or mitigation and monitoring
↑↓	Both positive and negative impacts	Consider policy wording changes and/ or mitigation and monitoring
↓	Negative impact	Consider policy changes and/or mitigation
↓	Significant negative impact	Consider changing the policy
-	No impact	

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

Comments are included to highlight the significant effects of the policy options in terms of direct or indirect effects, whether effects are permanent or temporary, and timescales. In the comments column the following applies in respect of timescale.

Short term	1-3 years
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Medium term	3-10 years
Long term	More than 10 years

3.6. Stage B - Developing alternatives and assessing effects

3.6.1. In developing the City Plan 2036, a series of options (reasonable alternatives) were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement
- The City Corporation's objectives and priorities

3.6.2. Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses.

3.6.3. Each option was assessed using the IIA framework. A sustainability commentary (Appendix 4) showing the outcome of this assessment was published alongside the consultation at Issues & Options stage. This assessment informed the decisions on the preferred approach for the emerging policy.

3.7. Difficulties encountered

3.7.1. Uncertainty surrounding how the decision to leave the European Union will be implemented, the precise nature of the UK's future relationship with the EU and how this will affect the City, presents some difficulties in assessment of economic impacts.

3.7.2. The City Corporation is preparing a draft Transport Strategy alongside preparation of the draft Local Plan. While this will bring benefits in terms of policy alignment, it has resulted in extensive changes to the draft transport policies in the Local Plan which has made assessment of their effects more difficult.

3.7.3. The draft Local Plan has been prepared against the background of a new NPPF and emerging requirements such as Statements of Common Ground with neighbouring boroughs and other key partners, the implications of which are still uncertain. It has also been prepared in the context of the London Plan review, with the draft London Plan likely to be subject to further changes as a result of the Examination in Public during 2019. This creates uncertainties for the City's Local Plan review as the strategic planning context is subject to considerable ongoing change.

4. Sustainability Context

4.1. Other relevant Plans and Programmes

4.1.1. The preparation of the City Plan 2036 has taken account of a range of other Plans and programmes a summary of these is included in appendix 1 and listed below:

Other Local Plans and Programmes

- City of London Local Plan
- City of London Corporate Plan 2018-23

- City of London Statement of Community Involvement 2016
- City of London Open Spaces Strategy 2015
- City of London Biodiversity Action Plan 2016-2020
- City of London Tree Strategy
- City of London Waste Strategy 2013-2020
- City of London Air Quality Strategy 2015 - 2020
- City of London Noise Strategy 2016-2026
- City of London Contaminated Land Inspection Strategy 2015-2020
- City of London Strategic Flood Risk Assessment 2017
- City of London Local Flood Risk Management Strategy 2014- 2020
- City of London Housing Asset Management Strategy 2015-20
- City of London Health and Well Being Profile Update
- City and Hackney Joint Strategic Needs Assessment City Supplement
- City of London Joint Health and Wellbeing Strategy, 2017 - 2020
- City of London Education Strategy 2016-19
- City of London Rail Strategy
- City of London Cycle Parking Strategy
- City of London Road Danger Reduction Plan
- Draft City of London Road Danger Reduction and Active Travel Plan
- City of London Local Implementation Plan
- City of London Thames Strategy SPD
- City of London Cultural Strategy 2018-22
- City of London Visitor Strategy 2013-17
- City of London Police Policing Plan 2017-2020
- Safer City Partnership Strategic Plan 2017-18
- City of London Statement of licensing policy
- Conservation Area Strategy SPDs
- Environmental Enhancement Strategies
- Draft Eastern City Cluster Strategy
- Culture Mile Look and Feel Strategy
- Fenchurch & Monument Area Enhancement Strategy
- Bank Area Enhancement Strategy
- Chancery Lane Area Enhancement Strategy
- Cheapside Area Strategy
- Barbican Area Enhancement Strategy
- Fleet Street Courts and Lanes Design Strategy
- Riverside Walk Enhancement Strategy
- Aldgate and Tower Area Enhancement Strategy
- Liverpool Street Area Enhancement Strategy
- West Smithfield Area Enhancement Strategy
- CIL charging schedule
- Air Quality SPD
- Archaeology and Development Guidance SPD
- Freight and Servicing SPD
- City Public Realm SPD
- City of London Planning Obligations SPD
- City of London Office use SPD
- City of London Protected Views SPD

- Standard Highways and servicing requirements for developments in the City of London Planning Advice note
- City of London Climate Change Mitigation Strategy
- City of London Climate Change Adaptation Strategy
- Environment Agency City of London Environmental Factsheet

Other regional Plans and Programmes

- The London Plan 2015 consolidated with alterations since 2011
- Draft London Plan
- London Environment Strategy
- The Mayor's Transport Strategy 2018
- The Mayor's Vision for Cycling and cycling strategy 2015
- Mayor of London River Action Plan
- The London Health Inequalities Strategy
- The Mayor's Cultural Strategy (Review due early 2018)
- The Mayor's Cultural Strategy draft March 2018
- Mayor's Economic Development Strategy
- Draft Mayors Economic Development Strategy for London
- Smarter London Together
- London Infrastructure Plan 2050 (draft)
- London Housing Strategy
- Mayor's Police and Crime Plan 2017-2021
- Thames Estuary 2100 Plan
- Thames River Basin Management Plan 2015
- Cultural Tourism Vision for London 2015-2017
- Westminster City Plan
- Camden Local Plan
- Islington Core Strategy and Development Management policies (review underway)
- Finsbury Local Plan (London Borough of Islington)
- Hackney Core Strategy and Development Management Policies (review underway)
- Tower Hamlets Core Strategy & Managing Development Plan Document 2025 (Review underway 2017)
- Southwark Core Strategy and saved policies from the Southwark Plan
- Lambeth Local Plan
- London View Management Framework SPG
- London's World Heritage Sites - Guidance on settings SPG
- Tower of London - World Heritage Site Management Plan
- Tower of London - Local Setting Study
- Mayor of London Community Infrastructure Levy Charging Schedule
- Mayoral Community Infrastructure Levy 2
- Mayor of London Use of Planning Obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy SPG
- Mayor of London Character and Context SPG
- Mayor of London CAZ SPG

- Accessible London: Achieving an Inclusive environment 2014
- Mayors Culture and Night-Time Economy SPG
- Mayors Culture and Night-Time Economy SPG
- Mayors Culture and Night-Time Economy SPG
- Mayor's Sustainable Design and Construction SPG

Other National Plans and Programmes

- National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (NPPG)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services
- Waste Management Plan for England
- National Planning Policy for Waste
- The Air Quality Strategy for England Scotland Wales and Northern Ireland Vol 1
- The Air Quality Strategy for England Scotland Wales and Northern Ireland Vol 2
- BEIS Clean Growth Strategy
- The National Adaptation Programme - 2018-2023
- Historic England Advice Note 4 Tall Buildings
- Historic England Good Practice Advice note - the Historic Environment in Local Plans (GPA1)
- Historic England Good Practice Advice note - Managing significance in decision taking in the Historic Environment (GPA2)
- Historic England Good Practice Advice note The setting of heritage assets (GPA3)
- Historic England Advice note 1 Conservation area designation appraisal and management
- Historic England Advice note 2 Making changes to heritage assets
- Infrastructure Act 2015
- Growth and Infrastructure Act 2013
- Localism Act 2011
- Climate Change Act 2008
- Planning Act 2008
- Planning and Compulsory Purchase Act 2004
- Planning (Listed Buildings and conservation Areas) Act 1990
- Environment Agency - Groundwater protection: principles and practice
- Fair Society, Healthy Lives, The Marmot Review (2010)
- A Green Future: Our 25 Year Plan to Improve the Environment
- Housing and Planning Act 2016
- Housing White Paper: Fixing our Broken Housing Market
- Industrial Strategy: Building a Britain fit for the Future
- Draft Clean Air Strategy 2018

Other International Plans and Programmes

- Strategic Plan for Biodiversity 2011-2020, including Biodiversity Targets
- EU Biodiversity Strategy to 2020 – towards implementation
- EU Environment Action Programme to 2020

- Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives: (1999, 2000 & 2002) - New Air Quality Directive 2008/50/EC
- EU Water Framework Directive 2000/60/EC and amendments
- United Nations Sustainable development goals
- UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997) and Paris Agreement (2015)
- SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
- EU Sustainable Development Strategy Reviewed 2009
- Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration
- Directive on the Assessment and Management of Flood Risks 2007/60/EC
- The Waste Framework Directive (2008) Directive 2008/98/EC on waste
- The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste
- EU Environmental Noise Directive (2002) Directive 2002/49/EC relating to the assessment and management of environmental noise
- EU Biodiversity Strategy to 2020
- EU Conservation of Wild Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended
- European Transport Policy: White paper roadmap to a single European transport area
- 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)
- Integrated Pollution Prevention and Control Directive 2008/1/EC
- Habitats Directive 92/43/EEC

4.2. Baseline and likely evolution without a plan

- 4.2.1. Appendix 2 provides baseline information with an indication of progress against the sustainability objectives from the adopted Local Plan sustainability appraisal.
- 4.2.2. Economy – baseline- The City of London has retained its high ranking in the Global Financial Centres Index. Overall, the GVA of the City of London grew by 10% between 2008 and 2014, with a slight dip in productivity and a steady 18% rise in employment. It was estimated that at 31st March 2014 there was 8,624,000 million m² of gross office floor-space within the City (Corporation of London Development Info September 2014). Changes in working practices may enable higher occupation densities in the City's office buildings with a corresponding need for additional supporting space such as cafes and flexible working spaces
- 4.2.3. Economy – Likely evolution without a plan - Without a plan there is a danger that the type and quantity of workspace needed to accommodate the rising working population would be inadequate. London and the City could lose out to other centres either elsewhere in the UK or further afield affecting the UK economy. Key transport problems such as congestion of service vehicles and pedestrian overcrowding on the streets would get worse if development was not accompanied by appropriate transport and street scene alterations. Lack of coherent planning for utility infrastructure and connectivity would disadvantage City businesses compared with

other global financial centres. The absence of a strategic approach to safety and security could result in greater vulnerability to natural and man-made threats

- 4.2.4. Environment - baseline - There has been a net loss of open space from 33.22 hectares in 2008/9 to 32.58 hectares in 2013/14. This is complimented by over 50,000 m² total green roof and green wall area supporting biodiversity. The Thames Site of Metropolitan Importance for Nature Conservation suffers from frequent sewer overflows which affect its biodiversity value and water quality. The City, in common with much of London is an Air Quality Management Area for NO_x and particulates. The City remains free from contaminated land. There has been a gradual reduction in the City's carbon emissions in recent years.
- 4.2.5. Environment – Likely evolution without a Plan - The pressure for development to accommodate additional workers could result in encroachment into the City's valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Air quality and climate impacts of development would not be mitigated, leading to degradation of the local environment and an inability to meet air quality and carbon targets. Without strategic planning for waste, and local waste reduction, the costs of waste management could escalate as other Waste Planning Authorities fail to plan for waste imports from central London. Heritage assets, archaeological remains and views of historic landmarks could lose their protection without local protection through the City Plan 2036.
- 4.2.6. Social – baseline – The City has a resident population of around 8,000 with higher than average levels of educational attainment and better health than the UK population average. The working population is over 450,000 with a young age profile and 60/40 male/female gender balance. Social deprivation is low within the City but the surrounding boroughs have higher levels of deprivation.
- 4.2.7. Social – Likely evolution without a plan - The City's relatively small resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health and wellbeing of the City's workers could be compromised if insufficient recreation, relaxation and health facilities were developed. Without changes to the adopted Local Plan the City's aspiration to develop the cultural hub around the Barbican Centre would be less likely to progress.

4.3. Sustainability issues and problems

- 4.3.1. The sustainability issues and problems which the City faces were identified in the IIA Scoping Report. The consultation on the IIA Scoping report identified a further issue associated with the impact of additional numbers of workers and visitors on heritage assets within and adjacent to the City. The main sustainability issues and problems are summarised below:

Economy

- 4.3.2. **Employment** – The City's working population is projected to grow by over 100,000 during the plan period, driven by economic growth, loss of offices elsewhere in London and changes in working patterns, the introduction of new business sectors, expansion of professional services roles and supporting jobs such as those in the retail and hospitality sectors. Changes in working patterns and political uncertainty

may result in the need for more flexible workspace and appropriate supporting services.

- 4.3.3. **Transport & movement** – Additional public transport is planned however intensification of workspace could lead to vehicle and pedestrian congestion. Provision of facilities and infrastructure for active travel (walking & cycling) is important to combat climate impacts and for healthy lifestyles.
- 4.3.4. **Utilities Infrastructure** – Infrastructure must keep pace with the increase in employment whilst enabling a reduction in carbon emissions, pollution, flood risk and water use.
- 4.3.5. **Digital connectivity** – transformational changes in the level of connectivity are expected during the period of the City Plan 2036. This must keep pace with business expectations without detriment to carbon emissions, energy use or the historic environment, public realm and security.
- 4.3.6. **Security** - It is important that the City remains an open and welcoming place and that necessary security infrastructure is kept as unobtrusive as possible.

Environment

- 4.3.7. **Open space and biodiversity** - the City is densely developed, and 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. Protection, enhancement and provision of new open spaces is imperative.
- 4.3.8. **Air Quality** - 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.
- 4.3.9. **Soil and water quality, water resources and flood risk** - 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. Sustainable Drainage Systems should assist in providing protection from flood risk and water conservation measures will help protect water resources, but some areas of the City may become more vulnerable to flooding as the climate changes.
- 4.3.10. **Climate change mitigation and adaptation** - The City is a high energy user, where low and zero carbon energy sources only contribute a small proportion to this energy consumption. Local measures will complement grid decarbonisation to reduce emissions. Resilience to the effects of climate change, which could include overheating, flood risk & 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.
- 4.3.11. **Waste** - The City will continue to rely on waste sites beyond the City's boundaries for management and treatment of its waste arisings. Circular economy principles, waste minimisation and on-site waste management will become increasingly important in future.
- 4.3.12. **Heritage assets (architectural and archaeological)** - protection in place for the City's conservation areas, listed buildings and historic parks and gardens. Pressure on the City's historic assets and those of neighbouring boroughs will increase with increased development, working population and visitor numbers.

- 4.3.13. **Landscape and protected views** - 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, such as St Paul's Cathedral, from viewing points within and beyond the City's boundaries.

Social Issues

- 4.3.14. **Population** – 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 City's 7,400 usual residents and 1,400 second home owners⁴ entails partnership working with neighbouring boroughs, to ensure that cost effective health, education and social services can be provided. Suitable services will need to be provided taking account of a changing balance between residents, second home owners and the daytime needs of the increased working population.
- 4.3.15. **Equality** - 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. Access and inclusivity will enable participation in the City's prosperity regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity (parenthood), race, religion or belief, sex, sexual orientation.
- 4.3.16. **Housing** - 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. 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
- 4.3.17. **Health and wellbeing** - The health of the City's workers and residents is generally better than average. Particular health issues in the City include stress & 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. 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.
- 4.3.18. **Education & skills** - 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 student population of the City may change from its

⁴ GLA 2016 Demographic Projections – SHLAA DCLG based

current level (27,000) as educational institutions such as the London Metropolitan University consolidate their operations elsewhere and provincial universities seek satellite space in central London.

4.3.19. **Crime & antisocial behaviour** - Crime levels in the City are low making it one of the safest places in the country. 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.

4.3.20. **Culture & leisure** - Alongside its status as a financial centre, the City Corporation’s aspiration is for the City to strengthen its role as a cultural hub for London and beyond. The potential development of a cultural hub centred around the Barbican, Guildhall School of Music and Drama and a relocated Museum of London, has planning implications. Not least the need to ensure that the existing business environment, residential amenity, regional health facilities and open spaces are not compromised by the drive to intensify the north of the City as a cultural destination. Visitor numbers are likely to increase from the current levels of 8.8 million per year, with consequential needs for facilities to serve their needs.

5. Appraisal of Effects / Likely Significant effects of the City Plan 2036

5.1. City Plan 2036 Objectives

5.1.1. The adopted Local Plan objectives and structure were used as the basis for identification of alternatives at Issues and Options stage. The City Plan 2036 Vision and Objectives were shaped by the City of London Corporate Strategy 2018-2023 which sets the themes of Flourishing Society, Thriving Economy and Outstanding Environments. The evolution of these objectives (table 4) retains the key elements of the previous Local Plan objectives with an increased emphasis on innovation, creativity, culture and resilience.

5.1.2. Table 4 Evolution of the City Plan 2036 objectives.

Objectives at I&O Stage	Objectives at draft City Plan 2036 stage
To maintain the City’s position as the world’s leading international financial and business centre;	Thriving Economy - To support a thriving economy, maintaining the City’s position as a global hub for innovation in financial and professional services, commerce and culture.
To ensure that the challenges facing the five Key City Places are met, complementing the core business function of the City, contributing to its unique character and distinguishing it from other global financial districts;	Key Areas of Change - To ensure that the challenges facing the Key Areas for Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres
To promote a high quality of architecture and street scene appropriate to the City’s position at the historic core of London, complementing	Outstanding Environments - To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient

and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors	to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets
To ensure that the City of London remains at the forefront of action in response to climate change and other sustainability challenges that face high density urban environments, aiming to achieve national and international recognition for its sustainability objectives;	Outstanding Environments - To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets
To ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities, aiming for continuous improvement in the City's rating in satisfaction and quality of life surveys.	Flourishing Society - To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.

5.2. IIA objectives versus City Plan 2036 objectives

- 5.2.1. Comparison of the IIA objectives with the City Plan 2036 objectives highlights where there is alignment between the sustainability, health and equality aspiration for the City and the objectives of the City Plan 2036. Table 5
- 5.2.2. Assessment of the City Plan 2036 objectives against the City's IIA objectives showed general agreement between the IIA aspirations and the objectives of the plan. In particular, the objective of Contributing to a Flourishing Society showed consistent alignment with the IIA objectives.
- 5.2.3. Initially the wording of the Shape Outstanding Environments objective showed a lack of ambition in terms of the move towards a zero-emissions, zero-waste City. It included resilience to natural and man-made threats without acknowledging the need to minimise the City's contribution to threats such as climate change, air quality and resource depletion.
- 5.2.4. Initial wording for the Key Areas of Change objective was unclear about protection of heritage assets within the areas of change and it was felt that confirmation of this could improve the objective.
- 5.2.5. Wording changes improved the objectives to better reflect the City's sustainability and heritage aspirations.

Table 5 Comparison of City Plan 2036 Objectives with IIA Objectives

Plan objectives →	Contribute to a Flourishing Society To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.	Support a Thriving Economy To support a thriving economy, maintaining the City’s position as a global hub for innovation in financial and professional services, commerce and culture.	Shape Outstanding Environments To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets	Key Areas for Change To ensure that the challenges facing the Key Areas for Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres
IIA objectives ↓				
Economic growth	√	√	√	√
Attractive built environment	√	√	√	√
Safe environment & crime reduction	√	-	√	-
Heritage assets	-	-	√	√
Improved waste management	-	-	√	-
Environmental protection	-	-	√	-
Climate change	-	-	√	-
Open space	√	-	√	√
Biodiversity and greening	-	-	√	-
Transport & movement	√	√	√	√
Housing	√	-	√	-
Social and cultural facilities	√	√	√	√
Improved health	√	-	√	-
Education	√	√	-	√
Equality & inclusion	√	-	√	-
Key	√	IIA objectives align with City Plan 2036 objectives		
	-	No association between IIA objectives and City Plan 2036 objectives		

5.3. Reasonable Alternatives

5.3.1. In developing the City Plan 2036, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement

5.3.2. Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses

5.3.3. Assessment of these alternatives against the IIA objectives is summarised as a Sustainability Commentary (appendix 4) which was published alongside the Issues and Options consultation in September 2016. This commentary was used along with consultation responses (including from statutory consultees -see appendix 3) and evidence to develop the preferred options which have been brought forward into the draft City Plan 2036. Table 6 shows the alternatives considered with the preferred approach highlighted in green.

5.3.4. Table 6 Reasonable alternatives considered at Issues & Options stage with preferred approach highlighted in green

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft City Plan 2036
Office protection	Protect offices in commercial core only	Protect offices throughout the City	n/a	n/a	Thriving Economy Offices
Balance of land uses	Maintain City's B1 office employment focus	Diversify to allow more mixed-use services offices and affordable workspace	Diversify to allow more hotels	Diversify to allow more housing	Thriving Economy Offices
Utilities and digital infrastructure	Prioritise new utilities infrastructure according to strategic demand	Promote infrastructure improvements associated with each site in line	n/a	n/a	Thriving Economy Smart infrastructure & Utilities

	instigating a more collaborative approach to implementation and funding	with current planning policy			
Safety & Security	Continue to seek to strike a balance between promoting the night-time economy and protecting residential amenity	Identify areas of the City to promote night time uses	Identify areas of the City to restrict night time uses		Flourishing Society Safe & Secure City
Key City Places	Retain existing Key City Places	Identify Key City Places to cover the whole City	Review and identify new Areas of change where change is expected during the Plan period	n/a	Key Areas of Change
River transport	Continue to seek greater use of the River Thames for transport	Actively promote /require the use of the Thames for future servicing of buildings	n/a	n/a	Outstanding Environment Vehicular Transport & Servicing
Development on or over the river	Continue to maintain the openness of the river by refusing development on or over the river	Allow selective development on or over the river subject to navigation and safety	n/a	n/a	Key Areas of Change Thames Policy Area

		considerations			
Hotels and business accommodation	Continue to apply a criteria-based approach to new hotels	Identify areas where hotels should be restricted	Identify areas where hotels should be encouraged	Prioritise types of accommodation which specifically satisfy business needs (e.g. serviced apartments)	Thriving Economy Culture Visitors and night-time economy
Historic Environment	Protect only designated heritage assets and their settings	Protect designated and non-designated heritage assets and their settings	n/a	n/a	Outstanding Environment Historic Environment
Tall buildings and views protection	Promote tall buildings in the existing eastern cluster only	Protect additional views	Allow tall buildings in appropriate locations outside of strategic views and St Paul's Heights elsewhere in the City	n/a	Outstanding Environment Tall Buildings and Protected Views
Energy & CO2 emissions	Assist developers to achieve zero carbon by strategic planning for energy	Continue the current practice of site by site energy planning	n/a	n/a	Outstanding Environment Design
Air Quality	Implement local solutions such as reassignment	Employ London-wide	n/a	n/a	Flourishing Society Healthy &

	nt of vehicle space and stricter emission limits	initiatives only			Inclusive City
Transport & public realm	Site by site approach to transport & public realm	Local Plan strategic approach to transport and public realm			Outstanding Environment t Vehicular Transport & servicing Walking Cycling & Healthy Streets
Transport	Prioritise public transport	Prioritise pedestrian and cycle movement	Manage vehicle movement through restrictions & consolidation centres	n/a	Outstanding Environment t Vehicular Transport & servicing Walking Cycling & Healthy Streets
Waste	Promote circular economy, zero waste plans and on-site waste management	Develop local facilities for waste management	Continue to rely on waste facilities elsewhere	n/a	Outstanding Environment t Circular Economy & Waste
Flood Risk	Require flood resilience measures in development schemes at risk of flooding	Rely on building owners to install flood resilience measures	n/a	n/a	Outstanding Environment t Climate Resilience & Flood Risk

Open spaces	Protect all existing open space	Allow development on some open space	Require additional open space to be provided with development		Outstanding Environment Open Space & Green Infrastructure
Retail	Continue to focus A1 retail uses in existing Principal Shopping Centres and other retail in Retail Links	Modify number or role of Principal Shopping Centres (e.g. remove A1 priority in PSCs)	Consider retail development throughout the City adopting a site by site assessment	n/a	Thriving Economy Retail
Housing numbers	Plan to meet London Plan target only (141 units per annum)	Plan to meet the level of need identified in the SHMA (125 units per annum)	Plan to significantly exceed the London Plan housing target	n/a	Flourishing Society Housing
Housing location	Restrict new housing to established residential clusters	Permit housing anywhere in the City if site is unsuitable for office use	n/a	n/a	Flourishing Society Housing
Affordable Housing	Retain current affordable housing targets	Increase level of affordable housing required	n/a	n/a	Flourishing Society Housing
Social and community	Meet need for social and community	Work with partners in neighbouring	n/a	n/a	Flourishing Society Healthy &

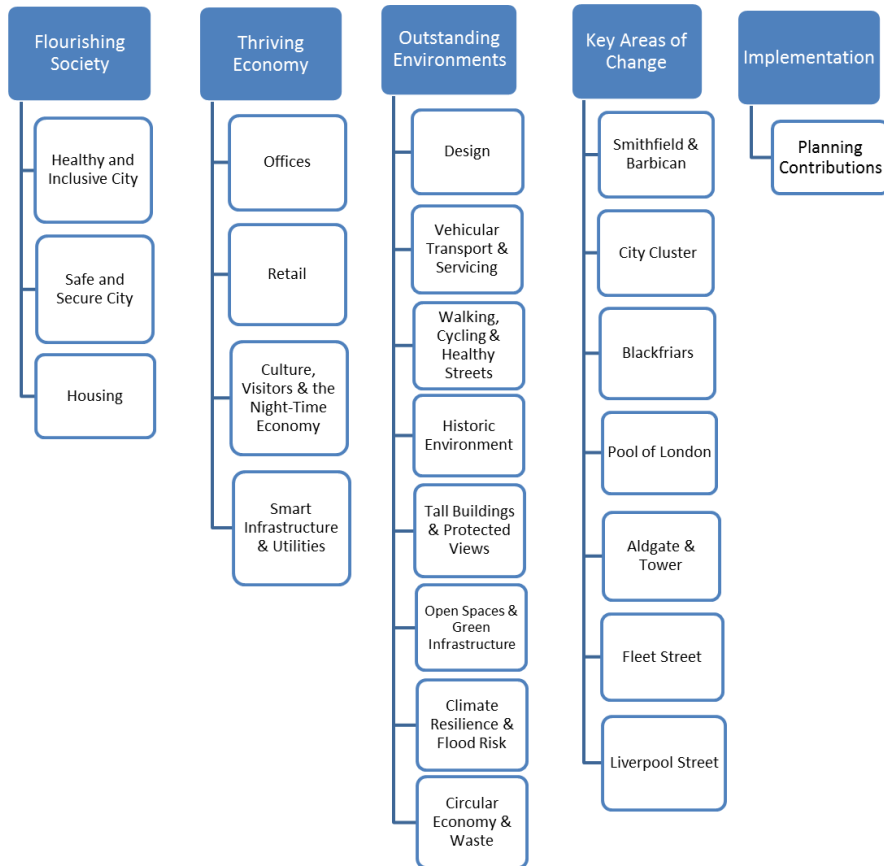
infrastructure	infrastructure in the City	boroughs to meet social and community infrastructure needs			Inclusive City
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Additional options considered after I&O stage consultation

Issue arising from the Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the City Plan 2036
Employment floorspace targets	Retain existing pipeline of employment floorspace (1.2 million sqm)	Increase pipeline to meet the London Plan employment projections requirements (2 million sqm)	n/a	n/a	Thriving Economy Offices
Urban Greening	Continue to encourage greening associated with development	Apply Urban Greening Factor target for major new development	n/a	n/a	Outstanding Environment Open Space & Green Infrastructure

5.4. Structure of City Plan 2036

5.4.1. Between issues and options and draft local plan stage the structure of the City Plan 2036 was finalised. The City Plan 2036 focusses on the City Corporation's strategic aims of contributing to a flourishing society, supporting a thriving economy and shaping outstanding environments. The spatial planning issues in key areas of change within the City are addressed and implementation policies complete the plan.



5.5. Reason for selecting preferred option in the draft City Plan 2036 policies

5.5.1. For each policy in the draft City Plan 2036 a policy story has been prepared (appendix 6) showing how the policy was developed. How the reasonable alternatives were identified and assessed, why the preferred alternatives have been chosen, and why others were rejected; what changes to the plan have been made as a result of the IIA; what comments the statutory consultees and the public have made and how these have influenced the policy.

5.5.2. Table 7 summarises the reasons for choosing the preferred approach in light of the alternatives for each policy

Table 7 Preferred Approach

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
Flourishing Society			
Healthy & Inclusive City	The draft policy draws together a range of health and inclusivity aspects including City specific air quality requirements and partnership working to provide social & community facilities	Emphasis on a healthy and inclusive City not only impacts the residents but also City workers and visitors. The City Corporation is committed to leading on air quality improvement for central London. Sharing of social and community services enables the City and neighbouring boroughs to benefit from greater efficiency	Air quality policies which just follow London wide initiatives would not address some specific City issues such as the high density of delivery vehicles and building related NOx and particulates. Local provision of services just in the City would miss the opportunity to contribute to health and wellbeing in neighbouring boroughs
Safe & Secure City	Incorporate safety & security measures in development schemes & public realm, working with the City Police. Balanced approach to night-time economy & residential amenity	A collective approach to safety & security issues provides the most effective outcomes. Collaboration with building owners on security relies on suitable designs which are promoted through this policy. This encompasses the preferred tactic of balancing licensing and planning requirements to reduce issues of conflict.	The small geographic area of the City makes segregation of night time uses from residential areas impractical.
Housing	Commit to meeting the	The policy is in conformity with London Plan targets	Allowing housing throughout the City

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
	London Plan housing target, providing housing in established residential clusters and seeking 35% affordable housing	for the City on housing numbers and affordable housing. The siting of housing in residential clusters helps to protect residential amenity and assists in provision of services.	could result in restrictions on business operation and construction activities due to disturbance.
Thriving Economy			
Offices	Protect offices throughout the City, setting a target of 2 million sq m additional office floorspace during the plan period	The preferred approach provides sufficient floorspace to accommodate GLA employment projections. Protection of office floorspace throughout the City will ensure that only surplus office space is released for other uses	Protecting office floorspace only in the commercial core would have uncertain impacts and could result in insufficient office floorspace. The GLA has suggested deleting references to defining a commercial core in the City in their proposed minor changes to the draft London Plan.
Retailing	Promote the development of four Principal Shopping Centres direction major retail to PSCs. Allow smaller retail elsewhere, encouraging specialist retail uses and retail markets at suitable times and locations	Promoting major retail in 4 rather than 5 PSCs makes these PSCs more attractive as retail destinations. Smaller retail uses elsewhere serve the time constrained workers requirement for catering outlets close to office locations. Specialist retail and retail markets add to the City's vitality, subject to constraints that are set out in policy.	The option of restricting retail to the PSCs and retail links only was rejected because changing retail trends indicate that mixed use development with retail in ground floor locations throughout the City is viable and desirable.
Culture, visitors and night- time economy	Hotels are encouraged for business and leisure visitors,	This policy approach allows flexibility in the provision of visitor accommodation but sets out impacts that	Specifying particular types of visitor accommodation or areas where hotels should be

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
	where they will not conflict with the business City. Criteria are set out to guide hotel development.	would be unacceptable. This should result in suitable accommodation which does not conflict with other land uses.	focusses was rejected since visitor accommodation needs fluctuate and such an approach could be too restrictive/undeliverable.
Smart Infrastructure and Utilities	Minimise overall demands on the City's utility infrastructure, promoting engagement with utility providers and prioritising collective infrastructure and route sharing	This more collaborative approach to utility infrastructure provides the basis for efficient provision of services which minimises resource use. This approach provides greater resilience to the City as a whole.	There is a danger that a site by site approach could lead to conflicts between the demands of existing and new development and potential for waste in the provision of physical infrastructure and its products (electricity, water , gas etc)
Outstanding Environments			
Design	Sustainability standards are integrated into the design policy which carries forward the Local Plan design policy direction	Integration of sustainable design standards into this policy will ensure that these aspects are considered at an early stage and incorporated into the building design	Although the Design policy continues the site by site approach to energy planning and carbon offsetting this is set in the context of wider energy infrastructure (smart infrastructure & utilities)
Vehicular Transport & Servicing	Policy supports improvements to public transport capacity and proposes management of freight and servicing through consolidation and retiming	This approach addresses the issue of freight and service vehicle congestion as the City's office floorspace intensifies. Continued support for public transport is essential to accommodate the anticipated increase in workforce during the plan period	The option of addressing vehicular transport through a site by site approach was rejected because it would not address vehicle congestion and air quality issues facing the City

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
Walking Cycling & Healthy Streets	This policy places emphasis on delivering the Mayor's Healthy Streets approach, prioritising walking & cycling and restricting non-essential traffic	This approach addresses the issue of pedestrian and cycle congestion, improving air quality and promoting healthy lifestyles through active travel. Enhancement of the safety and appearance of the public realm is promoted taking account of the needs of people with disabilities	The option of addressing transport and public realm on a site by site basis was rejected since it would not tackle the strategic issues of pedestrian and cycle congestion facing the City.
Historic Environment	The policy approach is to protect designated and non-designated heritage assets and their settings	This approach reinforces the unique environment of the City where historic assets and listed buildings make a contribution to the primary business functions.	The approach of only protecting designated heritage assets would be contrary to London Plan
Tall Buildings & Protected Views	The draft plan will allow tall buildings in appropriate locations where they met other environmental, design and other related policies. Policy formalises the view of St Paul's from Fleet Street, which had previously been applied on an informal basis during negotiations with developers.	Tall buildings are promoted in the City Cluster as this is the area most suited for their development within the City of London. This policy is in line with the London View Management Framework. Tall buildings may be permitted elsewhere only if they meet the strict criteria set out in the policy.	The option of protecting additional views was rejected since it could impact on economic development. Formalising the view of St Paul's from Fleet Street was seen as reinforcing existing views protection for the dome of St Paul's Cathedral
Open spaces & Green Infrastructure	Policy seeks to promote a greener City through protection of	The preferred approach recognises the contribution that open space and urban greening makes to health and	The option of allowing development on some open space was rejected because of its detrimental impacts on

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
	existing open spaces, measures to enhance biodiversity and creating and maintaining a high-quality green infrastructure. A target Urban Greening Factor for development has been introduced	wellbeing, climate resilience, biodiversity and air quality improvement	the build environment and health and wellbeing. The option of requiring additional open space associated with development was rejected in favour of introducing a target Urban Greening Factor associated with development, although greater permeability in and around development sites is strongly promoted.
Climate Resilience & Flood Risk	Overheating, urban heat island effects and flood risk are identified as the main climate risks to be addressed. SuDS in all development and public realm, and flood resilience are required	The forward- looking approach to flood resistance and resilience, overheating and SuDS set out in this policy should ensure that the City remains resilient in the face of climate change. This approach to SuDS will have benefits in reducing flood risk beyond the City	The option of relying on building owners to install flood resistance and resilience measures was rejected since such measures are more effective as part of the design rather than as retrofit.
Circular Economy & Waste	The preferred approach is to promote circular economy principles promoting on site waste treatment for major sites. Continued reliance on waste sites outside the City is proposed	The preferred approach provides a mechanism for reducing the waste generated in the City. This would reduce the environmental impacts of waste transport and treatment elsewhere.	The option of developing local facilities for waste management was rejected due to the small geographic area and high land values in the City which would make such facilities unviable

Policy topic	Preferred approach	Reason for choosing the preferred approach	Reason for rejecting alternatives
Key Areas of Change			
These policies identify new areas where significant change is likely over the plan period	<p>Seven Key Areas of Change have been identified:</p> <ul style="list-style-type: none"> - Blackfriars - Pool of London - Aldgate & Tower - City Cluster - Fleet Street - Smithfield & Barbican - Liverpool Street 	<p>These Key Areas of Change were identified through</p> <ul style="list-style-type: none"> I&O consultation responses Internal consultation with City Corporation officers Discussion with Members of the Local Plans Sub-Committee Informal engagement with other stakeholders and partners Analysis of monitoring evidence and trend data. 	<p>The option of keeping the Key City Places from the adopted Local Plan was rejected since change will affect different areas in the period to 2036. The option of identifying Key City Places to cover the whole of the City was rejected because it would fail to focus on areas where most development is likely to take place and where the provision of new infrastructure will be prioritised.</p>
Implementation			
Planning contributions and viability	Policy sets out the City's approach and priorities regarding planning contributions and framework for viability assessments	This policy sets out the framework for the use of S106 planning obligations and Community Infrastructure Levy to mitigate the impact of development	The City's priorities for planning obligations have been carried forward from the adopted Local Plan.

5.5. Assessment findings – draft City Plan 2036 policies

- 5.5.1. The assessment identified that many of the draft City Plan 2036 policies would have significant positive impacts when assessed against the IIA objectives. The Key areas of change policies were significantly positive for economic growth and the built environment and public realm. The emphasis on healthy and inclusive City and open spaces and green infrastructure should have a significant positive impact on the health, open spaces and biodiversity objectives.
- 5.5.2. Some negative effects were identified but none were significant negative. The negative impacts relate to the commercial nature of development in the City and its impact on housing and the restrictions on tall buildings which protect views of historic landmarks.
- 5.5.3. A summary of the assessment findings is shown in table 8. The key to the symbols used in this summary table:








	Significant positive effect likely
	Minor positive effect likely
	Negligible effect likely
	Minor negative effect likely
	Significant negative effect likely
	Likely effect uncertain
	Mixed effect likely

Table 8 Summary of assessment findings

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Contribute to a Flourishing Society																
S1	Healthy & Inclusive City	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
S2	Safe & Secure City	Green	Blue	Green	Orange	Orange	Orange	Orange	Blue	Orange	Blue	Green	Orange	Green	Orange	Blue
S3	Housing	Blue	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Green	Green	Orange	Orange	Orange	Green
Support a Thriving Economy																
S4	Offices	Green	Blue	Orange	Blue	Yellow	Blue	Blue	Orange	Orange	Blue	Yellow	Orange	Orange	Green	Green
S5	Retail	Green	Green	Blue	Blue	Blue	Blue	Orange	Orange	Orange	Blue	Blue	Green	Orange	Orange	Green
S6	Culture, Visitors Night Economy	Green	Green	Green	Green	Blue	Blue	Orange	Green	Green	Blue	Blue	Green	Green	Green	Green
S7	Smart Utilities & Infrastructure	Green	Green	Green	Blue	Green	Orange	Green	Orange	Orange	Green	Orange	Orange	Orange	Orange	Orange
Shape Outstanding Environments																
S8	Design	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Green	Orange	Green
S9	Vehicle Transp. Servicing	Blue	Green	Green	Orange	Blue	Orange	Blue	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange
S10	Walking Cycling Healthy Streets	Blue	Blue	Green	Blue	Orange	Green	Green	Green	Orange	Blue	Orange	Orange	Green	Orange	Green
S11	Historic Environment	Blue	Green	Orange	Green	Orange	Orange	Orange	Orange	Green	Orange	Orange	Green	Orange	Green	Blue
S12	Tall Buildings	Yellow	Green	Green	Green	Orange	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Green
S13	Protected Views	Yellow	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
S14	Open Space Green Infrastructure	Green	Green	Blue	Blue	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green
S15	Climate resilience Flood Risk	Green	Green	Orange	Blue	Orange	Green	Blue	Orange	Green	Orange	Green	Green	Green	Orange	Orange
S16	Circular Economy and Waste	Green	Green	Orange	Orange	Orange	Green	Orange	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange
Key Areas of Change																
S17	Thames policy Area	Green	Green	Blue	Blue	Green	Green	Blue	Green	Green	Blue	Orange	Green	Green	Orange	Orange
S18	Blackfriars	Green	Green	Blue	Green	Blue	Green	Blue	Green	Green	Blue	Orange	Green	Orange	Orange	Orange
S19	Pool of London	Green	Green	Blue	Green	Blue	Green	Blue	Green	Green	Blue	Blue	Green	Orange	Green	Orange
S20	Aldgate & Tower	Green	Green	Blue	Blue	Orange	Blue	Blue	Blue	Blue	Orange	Blue	Orange	Orange	Orange	Orange
S21	City Cluster	Green	Blue	Green	Green	Orange	Blue	Orange	Orange	Orange	Blue	Orange	Orange	Orange	Green	Orange
S22	Fleet Street	Green	Green	Green	Blue	Orange	Orange	Orange	Green	Green	Blue	Orange	Orange	Orange	Orange	Orange
S23	Smithfield & Barbican	Green	Green	Blue	Green	Blue	Blue	Blue	Green	Green	Green	Blue	Blue	Blue	Green	Green
S24	Culture Mile	Green	Green	Blue	Green	Orange	Orange	Orange	Green	Green	Green	Blue	Blue	Blue	Green	Green
S25	Smithfield	Green	Green	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
S26	Liverpool Street	Green	Green	Blue	Orange	Blue	Orange	Orange	Orange	Green	Green	Orange	Green	Green	Orange	Green
Implementation																
S27	Planning contributions	Green	Green	Green	Orange	Orange	Orange	Green	Orange	Orange	Green	Green	Orange	Orange	Green	Orange

- 5.5.4. Healthy & Inclusive City – This range of policies incorporates inclusive buildings and spaces, environmental protection issues of air quality, noise and light pollution, contaminated land, social and community facilities, sport, play & recreation. These policies perform well against the IIA social and environmental objectives and there was some uncertainty as to whether provision of recreation facilities would conflict with biodiversity and greening. Against the economic objectives it was felt that this suite of policies could result in additional costs and conflict with the primary economic role of the City but were important in providing a high quality and attractive environment.
- 5.5.5. Safe & Secure City – This suite of policies promotes collective security measures and counter terrorism, consulting with the City of London Police on risk mitigation measures, designing egress and dispersal routes and other security measures into development so that it is sympathetic to the surrounding area. These policies performed well against the economic objectives and were seen as essential for a high profile area like the City. The main uncertainty was whether security measures would impact on accessibility.
- 5.5.6. Housing – these policies address the quantity and location of new housing, loss of existing housing, residential quality and amenity and different types of short term lets, student housing, hostels, self-build and older persons housing. The special residential / professional environment of the Temples is also covered in this policy topic. These policies had mainly positive assessments against the social IIA objectives although there was uncertainty as to the impact of older persons housing and short lets on mainstream housing capacity. Policies had little impact on the environmental IIA objectives but could be improved with more emphasis on open space and greening. Conflicts with the commercial role of the City were highlighted in the assessment against economic objectives but the City's small housing targets minimises this impact.
- 5.5.7. Offices – As the main land use in the City policies in this section of the City Plan 2036 will determine the quantity and type of office development through protection of existing offices, targets for new office floorspace and the use of vacant buildings and spaces for “meanwhile uses”. The office policies were seen to be positive for economic growth but with potential detrimental effect on the public realm through increased pedestrian and vehicle numbers. Protection of offices was seen as detrimental to housing capacity however the government has recognised the importance of offices through an Article 4 direction which prevents permitted development of offices to housing in the City. The increased development required to meet office floorspace targets could be detrimental in generating high levels of waste which must be transported elsewhere for treatment. Lack of clarity on the types of “meanwhile uses” that might be allowed led to uncertainty against environmental and social objectives for this policy.
- 5.5.8. Retailing – The retail policies define the quantity and quality of retail development, principle shopping centre designation and retail links, retail at ground floor level, specialist retail and markets. These policies were seen as positive for economic and social objectives, with some uncertainty over crime and antisocial behaviour. Potential negative impacts on environmental objectives such as waste and climate mitigation were identified, particularly associated with markets. Retailing was seen as mainly positive for the historic environment due to the emphasis on historic retail areas at Fleet Street and Leadenhall Market.

- 5.5.9. Culture visitors and night-time economy – This suite of policies seeks to promote a world class cultural environment, encouraging public art, protecting existing facilities and supporting open spaces for visitors, permitting hotels as long as they do not displace offices or harm amenity and limiting disturbance associated with the night – time economy. These policies were assessed as mainly positive for the economic and social IIA objectives. There was less certainty over their impact on waste, environmental protection and climate change mitigation and resilience due to noise, pollution and energy use associated with visitor accommodation and night time economy.
- 5.5.10. Smart Infrastructure and Utilities – These policies aim to ensure that sufficient utility infrastructure is available to support the level of development proposed in the City Plan 2036. Policies were assessed as having mainly positive effects with the only uncertainty being associated with heritage assets.
- 5.5.11. Design - These policies cover a wide range of design issues associated with new development and public realm. This includes sustainability standards, permeability, terraces and viewing galleries, advertisements and shopfronts, lighting, daylight and sunlight. Positive impacts were identified against most IIA objectives. Higher cost associated with some standards and restrictions due to daylight and sunlight requirements were seen as potential negatives for economic growth. Emphasis on appearance rather than function of the public realm was seen as an area where the policy could be improved.
- 5.5.12. Vehicular Transport & Servicing – these policies deal with the impact of development on transport needs, freight and servicing, vehicle parking, river transport and aviation landing facilities. The introduction of consolidation requirements for freight and waste has uncertain impacts against many of the IIA objectives. Impacts will need to be monitored closely on implementation to ensure that negative consequences do not arise either within or outside the City.
- 5.5.13. Walking, Cycling and Healthy Streets – these policies promote the Healthy Streets approach providing for increased pedestrian and cyclist numbers and improved facilities in buildings to support active travel. The potential conflict between vehicle and pedestrian / cyclists needs on the City’s streets shows up through the assessment and the space needed for active travel facilities is seen as detrimental in using space that could be let as commercial office space.
- 5.5.14. Historic environment – This policy protects the historic environment whilst managing change associated with heritage assets, ancient monuments and archaeology. Particular reference is made to the setting of the Tower of London. The impacts are assessed as mainly positive but possible negatives are associated with economic growth since protection could restrict business development. However, the City’s historic landmarks are seen as a unique selling point for the City.
- 5.5.15. Tall Buildings and Protected Views – these policies protect the views of historic landmarks by restricting the areas that are appropriate for tall buildings. The policies will have many positive impacts particularly at a regional scale but could restrict economic growth if insufficient office floorspace can be developed in the appropriate areas.
- 5.5.16. Open Spaces and Green Infrastructure - These policies promote a greener City, setting an Urban Greening Factor for new development and requiring measures to enhance biodiversity. Assessment shows significant positive impacts on the open spaces, built environment and health IIA objectives. Some uncertainty is associated

with heritage assets since historic parks and gardens were not initially mentioned in the plan.

- 5.5.17. Climate Resilience and Flood Risk – policies deal with the range of actions needed to ensure that the City remains safe and pleasant in a changing climate. This covers overheating, urban heat island effect, flood risk sustainable drainage and flood defences. Impact were found to be mainly positive but with uncertainty around heritage assets.
- 5.5.18. Circular Economy & Waste – this policy area addresses the City’s statutory duties as a Waste Planning Authority (WPA) setting out how the City will co-operate with other WPAs to ensure that facilities are available with capacity to manage the City’s waste arisings. Waste minimisation, circular economy principles and sustainable waste transport are covered along with criteria for provision of new waste management sites in the City. The concept of a Zero Waste City and associated requirements for on site waste treatment were assessed as uncertain against several economic and environmental objectives. But in the main these policies were seen as essential and beneficial.
- 5.5.19. Key Areas of Change – these policies identify where the greatest change is likely during the plan period. They interpret the City Plan topic policy approaches for these areas. The assessment shows uncertainties in line with other policies in the plan.
- 5.5.20. Planning contributions and viability – The inclusion of this technical policy is assessed as mainly positive in providing guidance on what will be expected on these topics.

5.6. Sustainability Appraisal findings

- 5.6.1. The sustainability appraisal has assisted in identifying where improvements can be made to the draft City Plan 2036. The Positive impact of this can be seen in table 8a

Table 8a Impacts of the draft City Plan 2036

Parameter	Effect of draft City Plan 2036 (significant effects are marked in bold text)
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna. Significant positive impacts on local biodiversity should result from implementation of the open spaces and green infrastructure policies.
Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health. Significant positive impacts on health and environmental protection will result from the healthy and inclusive City policies
Soil, Water and Air	Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement. Policies for the

	Thames riverside and the air quality, and contaminated land and water quality will have significant positive impacts on soil, water and air.
Climatic factors	Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City's carbon emissions. Flood Risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate. No significant climate impacts were identified from the implementation of the plan due to the small geographic area covered
Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2036 policies including safe and secure City, visitors arts and culture, open spaces. The City's Key Areas of Change policies reinforce this generating significant local positive impacts.
Cultural heritage and Landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from distant viewing points. Significant positive impacts on cultural heritage will result from culture mile, Smithfield and Barbican area policies

5.7. Health Impact Assessment findings

5.7.1. Screening assessment against the IIA Health objective "To improve the health of the City's resident, worker and student populations" shows that the draft policies will have a number of positive impacts:

- Healthy & Inclusive City policy promotes healthy buildings and public realm encouraging designs for both mental and physical wellbeing
- Housing policy clusters residential communities minimising social isolation and enabling provision of health and social services
- Culture, Visitors and Night-time Economy provides the environment for social and cultural activities
- Improved open spaces provide physical and mental health benefits
- The plan's approach to transport will improve air quality and opportunities for active travel
- The climate resilience and flood risk policy will combat overheating with health benefits as the climate changes
- Several policies protect residential amenity with benefits for residents' health

5.7.2. The Health Impact Assessment screening identified some uncertainties associated with night-time economy providing opportunities for alcohol misuse, potential air quality impacts through increased use of the river without the introduction of emissions standards for rivercraft and potential for on-site waste management to cause health impacts through noise or pollution. All of these uncertainties are controlled through legislation which is outside a Planning remit. However, it is important to highlight potential problems and ensure that monitoring identifies any emerging issues.

5.7.3. No negative impacts were identified through the Health Impact Assessment screening therefore a full Health Impact Assessment will not be necessary.

5.8. Equalities Impact Assessment findings

5.8.1. Screening assessment against the Equality and Inclusion objective “To enable social and economic inclusion in and around the City for workers residents and visitors” showed that the draft policies will have a number of positive impacts:

- Healthy and Inclusive City policy and Open Space policy promotes inclusive buildings, public realm and open spaces and access to services for all.
- Housing policy requires a proportion of accessible housing and clustering of housing development which improves access to local services.
- Housing policy places greater emphasis on on-site affordable housing, which will help to meet the needs of some City residents on lower incomes.
- The requirement for 35% of student housing to be affordable supports access to educational opportunities for all.
- Office policy promotes flexible and adaptable workspace reducing economic inequality
- Provision of more retail will increase the range of jobs at different levels available in the City providing opportunities for people with different skill levels
- Public art is accessible to all
- Design policy requires accessibility for all to buildings and public realm
- Restricted car parking provides for Blue Badge holders
- Promotion of walking and cycling environment provides for people with disabilities and improves access for those at an economic disadvantage

5.8.2. Uncertainties were identified regarding whether increased security measures and preservation of the historic environment would limit accessibility. Careful design in line with the Design policy requirements should mitigate this risk. The IIA identified that potential “meanwhile uses” would need to be screened for accessibility and social inclusion for those with protected characteristics.

5.8.3. No negative impacts were identified through the Equalities Impact Assessment screening therefore a full Equalities Impact Assessment will not be necessary

5.9. Cumulative Effects of draft City Plan 2036 and other plans on IIA Objectives

5.9.1. IIA assessment of the draft City Plan 2036 shows that the policies will have largely positive impacts. Where uncertain impacts were identified mitigation has been proposed often through other policies in the plan or through minor wording changes.

5.9.2. The effect of the draft City Plan 2036 as a whole, against each objective is summarised in this section.

5.9.3. **Economic Growth** – The draft City Plan 2036 will largely sustain economic growth and employment opportunities providing suitable commercial floorspace and supporting economic growth at a local regional national and international scale. The City Plan’s approach to office development and culture visitors and night-time economy are particularly beneficial. Some uncertainties remain mainly associated with additional costs of heritage protection, social responsibility and sustainability requirements. Increasingly, global and local businesses accept corporate social responsibility as an integral part of their business models therefore providing an environment which caters for this is paramount.

5.9.4. The cumulative impact of implementation of the Local Plan 2036 alongside other plans for London’s economy such as the Mayors Economic Development Strategy and the London Plan will enable the City to maintain its position as a global leader in

finance and business sectors with an internationally recognised agglomeration of offices. London Plan strategic objectives of “making the best use of land” and “growing a good economy” will reinforce the City’s policies to sustain economic growth and employment opportunities locally, nationally and internationally, maintaining the City’s status as leading international financial and business centre. The major uncertainty for the economy is the impact of the UK’s decision to leave the European Union. The impact of plans for the UK economy after it leaves the EU will be considered as they emerge, and any significant policy changes will be assessed against the IIA objectives.

- 5.9.5. **Built environment and public realm** – The IIA assessments showed that the proposed policies will have largely positive impact at a local level. Security measures have the potential to be negative for accessibility and public realm enhancement and must be sensitively designed. Improved vibrancy could change the character of some parts of the City but is supported by surveys and consultation responses from City workers.
- 5.9.6. The City Plan 2036 is aligned with the City’s draft Transport Strategy and public realm enhancement strategies which together take account of the London wide transport, cycling and infrastructure strategies and plans for the Central Activities Zone (CAZ). The London Plan’s strategic aims of “making best use of land”, “creating a healthy City” and “increasing efficiency and improving resilience” will contribute to achievement of an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities in the City.
- 5.9.7. **Safe Environment and Crime** – Some policies aimed at providing a livelier environment in the City could potentially increase anti-social behaviour, but increased vibrancy provides passive surveillance against low level crime.
- 5.9.8. The City Plan 2036 will provide the spatial implementation of actions in the City of London Policing Plan and the safer City Partnership strategic plan. This is strengthened by the Mayor’s Police and Crime Plan and national anti-terrorism programmes. The London Plan strategic aim of “building strong and inclusive communities” further supports the City’s objective of reducing crime and antisocial behaviour, managing and responding to the security challenges that the City faces.
- 5.9.9. **Heritage assets** - Policies strongly support the protection of heritage assets as a key part of the City’s environment. Infrastructure could have negative impacts and must be sensitively designed within conservation areas and near listed buildings.
- 5.9.10. National and London-wide heritage protection overseen by Historic England, Historic Royal Palaces and the GLA provide the framework for the City Plan 2036’s heritage protection policies and the London Plan’s heritage, culture and view management framework ensure wider protection where necessary. The cumulative impact of these plans will assist the city in conserving or enhancing the significance of heritage assets and their settings enabling public appreciation and access wherever possible.
- 5.9.11. **Waste management** – Offices, retail and markets policies have the potential for negative impacts on waste as do policies on hotels and night-time economy. However the process of development in the City where buildings are often demolished to make way for new ones creates the biggest impact on the IIA aspirations for waste. Circular economy principles and resource conservation will be essential during the period of the plan to address this.

- 5.9.12. The London Borough of Bexley's Local Plan provides capacity to manage the City's waste apportionment. Waste Planning Authorities outside London where the City's waste is deposited will need to continue accepting waste from the City. This will be helped by waste minimisation and circular economy principles which are promoted in the London Plan and the London Environment Strategy. Together these plans will help to decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings.
- 5.9.13. **Environmental Protection** - Many of the policies in the plan have positive impacts on environmental protection contributing to carbon emission reduction, air and water quality improvements and noise and light pollution abatement. However retail, night-time economy, river transport and short-term residential lets were seen as having potential negative impacts.
- 5.9.14. Environmental protection is strongly supported through the London Environment Strategy, the Mayor's Transport Strategy and the London Plan providing a wider drive to reduce pollution. Since pollution does not respect borough boundaries this will in turn assist the City's objective to maximise protection and enhancement of the natural environment.
- 5.9.15. **Climate mitigation and resilience** – Retail policies were seen as having the greatest potential for negative impacts on climate mitigation due to the heating and cooling requirements. The introduction of consolidation centres was assessed as uncertain since there is potential for longer overall journeys resulting in higher emissions and the lack of controls on emissions from river transport results in negative assessment for this approach although it takes vehicles off the roads.
- 5.9.16. Climate mitigation and resilience are strongly supported at national level through the BEIS Clean Growth Strategy and at regional level by the Mayor's Environment Strategy and London Plan. London Plan carbon targets form the basis of the carbon reduction policies in the City Plan 2036 supporting the IIA aim of mitigating climate change, assisting in maintaining energy security and promoting climate change resilience.
- 5.9.17. **Improved Open Spaces, Biodiversity and urban greening** – The impact of policies on the Open Space objective was mainly positive with protection for the City's green spaces and a drive for greening the City through an urban greening target. Flood risk and sustainable drainage policies have the potential to make a positive contribution depending on their design. Meanwhile uses, markets, sport and recreation were also seen as having potential negative effects depending on the frequency and character of the activity. The cumulative impact of these policies will be positive provided that short term uses are adequately managed.
- 5.9.18. The Mayor's Environment Strategy encourages biodiversity enhancement across London. Coupled with the London Plan, this assists in the City's objectives to enhance provision and enhancement of open spaces and improve opportunities for biodiversity. The City's aspiration to enable public access to privately owned spaces is supported by the London Plan aim to build strong and inclusive communities.
- 5.9.19. **Transport & Movement** – The radical changes in transport and healthy streets policies have the potential to create a positive impact against this objective but there remain uncertainties regarding the patterns of pedestrian movement and the impact of servicing. Changes in retail patterns and night time economy could also affect the efficiency and sustainability of transport. However the move to healthy streets with facility for active transport provides a positive impact.

- 5.9.20. Wider transport and spatial development plans for London will impact on the City's small geographic area. Neighbouring borough's plans for intensification are mitigated by plans to increase public transport capacity, promote active travel modes and improve air quality associated with vehicle emissions. Strategic transport policies for London and the City's emerging Transport Strategy provide the framework within which the City's IIA objective of improving the safety, sustainability, efficiency and attractiveness of transport; minimising the negative environmental and health impacts of travel in, to, from and through the City.
- 5.9.21. **Housing** - The City's role as a business district means that policies do not promote housing as other authorities' plans might. However the City's small size and proximity to other areas enables housing to be provided elsewhere in line with London Plan targets and the City contributes to this through S106 contributions for housing.
- 5.9.22. The City relies heavily on other areas of London and beyond to provide housing for its 480,000 workers. The City's contribution in providing jobs outweighs the need to provide more housing within the City. London Plan housing policies and effective transport policies are key to the functioning of the City. The London Plan aims to meet the assessed level of need for housing. The City's commitment to meeting its London Plan housing target will contribute to the IIA objective of delivering an environment that meets the needs and expectations of residents.
- 5.9.23. **Social and cultural facilities** - assessment shows mainly positive impacts on social and cultural facilities with provision of shared services and facilities benefiting neighbouring areas as well as the City.
- 5.9.24. The City's aspiration to develop a cultural hub for London centred around the Barbican Centre is recognised in the London Plan and the Mayor's CAZ SPG and supported by the Mayor's Culture and Night-time Economy SPG. This aspiration coupled with the protection of existing facilities will help to provide suitable social and cultural facilities for all the City's communities.
- 5.9.25. **Health** – the plan as a whole takes a positive pro-active approach to health which is reflected in the assessment. The health impact assessment screening has concluded that further health impact assessment is not necessary.
- 5.9.26. The City of London Joint Health and Wellbeing Strategy's aim of creating a healthy urban environment aligns with the City Plan 2036 which places a greater emphasis on healthy streets, healthy lifestyles and healthy places. The London Health Inequalities Strategy reinforces this need for healthy places all of which will help to achieve the IIA objective of improving the health of the City's resident, worker and student populations.
- 5.9.27. **Education** – the assessment has not identified any negative impacts on education.
- 5.9.28. The City's policy of joint provision of schools relies on neighbouring boroughs Local Plans for allocation of suitable sites and in turn supports the development of facilities such as Academies in neighbouring boroughs. In enabling provision of student accommodation for central London Universities the City Plan 2036 supports opportunities for education and training.
- 5.9.29. **Equality and inclusion**- No negative impacts were identified through the Equalities Impact Assessment screening therefore a full Equalities Impact Assessment will not be necessary. The Key Areas of Change for Aldgate & Tower and Smithfield & Barbican policies support a positive approach to training, skills, education

employment and cultural enrichment for all. Planning contributions are secured for training and skills to encourage local employment from disadvantaged communities close to the City.

5.9.30. The Mayor's Equality Diversity and Inclusion Strategy provides a framework for addressing these topics and the London Plan aim of building strong and inclusive communities supports this.

5.9.31. Further assessment will be carried out on any changes as a result of public consultation or new evidence, as the plan approaches submission stage.

6. Impact of the IIA

6.1. Changes made as a result of IIA

6.1.1. Each emerging policy was assessed by the relevant policy officer and at least one other planner, then discussed with the other policy team members providing a collaborative approach. Policy development was therefore informed by this iterative process and changes were made in the course of drafting each policy.

6.1.2. IIA assessments for the draft City Plan 2036 were carried out on policy versions as they were considered by the Local Plans Sub Committee. Subsequent changes resulting from the incorporation of suggested mitigation measures and consultation comments will be reassessed prior to submission stage.

6.1.3. Specific changes which can be attributed to the IIA process to date are as follows:

- The City Plan 2036 objectives were refined to encompass the need to minimise the environmental impacts of the City's activities and to include heritage protection within the Key Areas of Change objective.
- Alternatives which the IIA demonstrated to have negative impacts such as development of local waste management facilities and allowing development on some open space were rejected in the evolution of policy.

6.1.4. Where uncertainties were identified through the IIA mitigation measures have been identified and will be incorporated into policies along with any changes as a result of the draft City Plan 2036 consultation.

7. Mitigation

7.1.1. Where uncertainties were identified through the IIA mitigation measures have been identified, as set out in Appendix 5, and will be incorporated into policies along with any changes as a result of the draft City Plan 2036 consultation. Table 9 gives some examples of mitigation proposed along with an indication of which measures have been incorporated into the draft City Plan 2036 for consultation and which will be addressed subsequently or in a different way.

7.1.2. A few negative effects were identified but none of these were significantly negative. The negative impacts of office development relate to waste management and housing. The draft Plan promotes circular economy principles and measures to reduce the amount of waste in major developments but the intensity of commercial development in the City means that some negative impact on waste management is likely to be unavoidable, at least in the short to medium term. The City's London Plan waste apportionment is relatively low recognising the difficulty of providing waste management capacity within the City's confined geographic area. The City Corporation will work in partnership with other Waste Planning Authorities to help mitigate the negative impact of development on waste.

7.1.3. Due to the City's strategic importance to London's economy, the London Plan only allocates it a relatively small housing target. The draft Plan aims to meet the London Plan housing target, so no further mitigation is required.

7.1.4. The restrictions on tall buildings which protect views of historic landmarks were identified as having minor negative impacts on economic growth. This will be mitigated by exploiting development potential where it is available in parts of the City where views protection does not apply. The draft Plan identifies regeneration opportunities in the City Cluster, where tall buildings may be appropriate subject to certain criteria.

Table 9 Mitigation of uncertain impacts

Mitigation proposed in IIA	How addressed in Local Plan
Flourishing Society	
<ul style="list-style-type: none"> Inclusiveness in play facilities and areas should be promoted 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses. 	<ul style="list-style-type: none"> Dealt with elsewhere in the draft Plan, albeit no specific reference to these uses. Further consideration will be given to this in the light of consultation feedback.
<ul style="list-style-type: none"> Introduce consistency of approach on over concentration of student housing, hotels and short lets. 	<ul style="list-style-type: none"> Policy wording is consistent, albeit not very detailed. Further consideration will be given to this in the light of consultation feedback.
Thriving Economy	
<ul style="list-style-type: none"> Designs of new office and retail development will be key to their sustainability 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Policy needs to define what types of "meanwhile uses" would be acceptable 	<ul style="list-style-type: none"> Proposed mitigation considered to be too prescriptive because the acceptability of different meanwhile uses will vary according to site conditions and location. Further consideration will be given to this in the light of consultation responses.
Outstanding Environments	
<ul style="list-style-type: none"> A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible 	<ul style="list-style-type: none"> Will be addressed at next stage following adoption of the City's Transport Strategy
<ul style="list-style-type: none"> Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate. 	<ul style="list-style-type: none"> Dealt with elsewhere in the draft Plan so not included at this stage. Further consideration will be given to this in the light of consultation responses.
<ul style="list-style-type: none"> Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Reference should be made to other historic assets not just archaeology in flood risk & SuDS policy 	<ul style="list-style-type: none"> Incorporated into draft Plan
<ul style="list-style-type: none"> Safeguards should be included to ensure that on-site waste treatment facilities do not cause disturbance to neighbouring uses 	<ul style="list-style-type: none"> Will be addressed at next stage in the light of consultation feedback
Key Areas of Change	

<ul style="list-style-type: none"> • Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan. 	<ul style="list-style-type: none"> • No further mitigation required.
<ul style="list-style-type: none"> • Identification of heritage assets in the Thames Policy Area is recommended 	<ul style="list-style-type: none"> • Incorporated into draft Plan

7.1.5. The IIA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the IIA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan. Mitigation measures will be incorporated into policies alongside any changes made in response to consultation comments.

8. Monitoring framework

8.1.1. A monitoring framework will be developed to monitor the significant effects of implementing the City Plan 2036. This will ensure that where uncertainties exist any unintended adverse effects are picked up quickly. The monitoring framework will be published at Publication Stage (Reg 19) and finalised on adoption of the City Plan 2036

9. Next steps

This IIA report will be issued for public consultation alongside the draft City Plan 2036 in November 2018. Comments on the draft City Plan 2036 and this IIA will inform the submission version of the plan which will undergo public examination prior to adoption.

Appendices

Appendix 1 Other Plans & Programmes

Appendix 2 Baseline information

Appendix 3 IIA Scoping and I&O Commentary Consultation Report

Appendix 4 IIA Commentary I&O consultation

Appendix 5 IIA Assessments draft City Plan 2036

Appendix 6 Policy Stories

Appendix 7 Quality Assurance Audit