

ED-SUS10

City of London

# **Integrated Impact Assessment Environmental Report**

Local Plan Review

City Plan 2036 Proposed Submission Draft

March 2021



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# 1. Non-Technical Summary

## IIA Scope

The Integrated Impact Assessment (IIA) 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 as set out in section 4.1. 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 of London has been significantly impacted by the Covid-19 pandemic as a result of flexible and remote working, with major reductions in footfall. Prior to Covid-19, the City's workforce was predicted to grow by over 110,000 during the period of the plan. Although the speed at which this growth takes place may be reduced in the short-term, recent economic modelling by the GLA suggests a gradual return of economic activity and a return to economic and employment growth. Continued investor and developer interest in the City as a place in which to do business indicates that it will continue to prosper and, over the life of the City Plan 2036, will see further employment growth.

The likely reduction in office occupation densities due to Covid-19 presents an opportunity for City offices and businesses to reinvent themselves and the way they work. It is likely that many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be counteracted by a shift towards lower occupation densities within offices. The overall impact on floorspace demand may therefore be broadly neutral. Without a plan the City would be unable to provide suitable office space to accommodate its growing 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. Around 522,000 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.

Further details of the issues the City faces are set out in section 4.3.

### 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 (section 4.2). 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
- Lee Valley SPA and Ramsar site

A separate Habitats Regulations Assessment Screening has been carried out which concludes that

“the City of London Proposed Submission 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 likely effects of the policy options and draft policies of the City Plan 2036 were appraised by reference to a framework of social, environmental and economic objectives and supporting criteria, which include health and equalities objectives (Section 3.5). These were informed by a review of other plans and programmes and identification of sustainability issues and problems facing the City and were subject to consultation at the scoping stage.

## 6) Significant effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City’s IIA objectives (section 5.2) 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 Proposed Submission Draft City Plan 2036 policies, both alone against the IIA objectives (section 5.6) and in combination with other relevant plans (section 5.10), demonstrates that the impact of the plan will be largely positive as summarised below.

**Table NTS1: Commentary on effects of Proposed Submission Draft City Plan 2036 against IIA objectives**

| <b>IIA Objective</b> | <b>Total Effects</b>  | <b>Cumulative Effects</b>  |
|----------------------|---|--|
| 1) Economic growth   | The 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 | The cumulative impact of implementation of the City Plan 2036 alongside other plans for London’s economy such as the Mayor’s 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 a leading international financial and |

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|---|---|---|
|   | therefore providing an environment which caters for this is paramount.  | business centre. The major uncertainty for the economy is the impact of Covid-19 and the UK's departure from the European Union. The impacts of plans for the UK economy and the trade deal agreed with the EU in December 2020 will be considered as they emerge, and any significant policy changes will be assessed against the IIA objectives.  |
| 2) Built environment and public realm   | The IIA assessments showed that the proposed policies in the City Plan 2036 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. | The City Plan 2036 is aligned with the City's 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. |
| 3) Safe environment and crime reduction | Some City Plan 2036 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. The policy on tall buildings applies the Civil Aviation Authority's maximum height limit for the safety of international flights.  | 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.   |
| 4) Heritage assets                      | Policies in the City Plan 2036 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   | National and London-wide heritage protection overseen by Historic England 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  |

|                                      |  |  |
|--------------------------------------|--|--|
|                                      | conservation areas and near listed buildings.  | 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) Waste management                  | Offices, retail and markets policies in the City Plan 2036 have the potential for negative impacts on waste as do policies on hotels and the night-time economy. However, the process of redevelopment in the City where buildings are often demolished to make way for new ones creates the biggest impact on the IIA aspirations for waste. The transformation and adaptation of space, circular economy principles and resource conservation will be essential during the period of the Plan to address this. | The London Borough of Bexley's Local Plan provides capacity to manage the City's waste apportionment, within the framework of a wider partnership group involving 5 London boroughs and the City. Waste Planning Authorities inside and 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. |
| 6) Environmental protection          | Many of the policies in the City Plan 2036 have positive impacts on environmental protection, contributing to carbon emission reduction, air and water quality improvements and noise and light pollution abatement. However, some policies including retail, night-time economy, river transport and short-term residential lets were seen as having potential negative impacts.  | 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.   |
| 7) Climate mitigation and resilience | Office and retail policies within the City Plan 2036 were seen as having potential for negative impacts on climate mitigation due to the heating and cooling requirements. The introduction of consolidation centres was assessed as having mixed positive and negative impacts since emissions may reduce in the City but increase elsewhere, and the lack of current controls on emissions from  | 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   |



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|  | river transport results in uncertainty for this approach, although it takes vehicles off the roads.  | maintaining energy security and promoting climate change resilience.   |
| 8) Open spaces<br><br>9) Biodiversity and urban greening | The impact of City Plan 2036 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 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. | 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.   |
| 10) Transport and movement                               | The radical changes in transport and healthy streets policies within the City Plan 2036 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 freight and 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 facilities for active transport provides a positive impact.  | 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 Transport Strategy provide the framework for the City's IIA objective of improving the safety, sustainability, efficiency and attractiveness of transport and minimising the negative environmental and health impacts of travel in, to, from and through the City. |
| 11) Housing  | The City's role as a business district means that the City Plan 2036 policies do not focus on housing to the same extent as other authorities' plans might. However, the City's small size and proximity to other areas enables housing to be provided elsewhere (as well as within the City) in line with London Plan targets and the City  | The City relies heavily on other areas of London and beyond to provide housing for its 520,000 workers. The City's contribution in providing jobs outweighs the need to provide significantly 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  |

|                                    |  |  |
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|                                    | contributes to this through S106 contributions for affordable housing.   | 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.   |
| 12) Social and cultural facilities | Assessment shows mainly positive impacts from the City Plan 2036 on social and cultural facilities with provision of shared services and facilities benefiting neighbouring areas as well as the City.             | The City's aspiration to develop a world-class cultural destination centred around the Barbican Centre and Smithfield 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.                                    |
| 13) Health                         | The City Plan 2036 as a whole takes a positive pro-active approach to health which is reflected in the assessment. This is reinforced by the findings of the Health Impact Assessment scoping exercise at Annex 1. | 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. |
| 14) Education                      | The assessment of the City Plan 2036 has not identified any negative impacts on education.   | 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.   |
| 15) Equality and inclusion         | No negative impacts from the City Plan 2036 were identified through the Equalities Impact Assessment screening therefore a full Equalities Impact Assessment will not be necessary. The Key Areas of Change        | 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.   |

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|  | <p>for Aldgate, Tower and Portsoken and Smithfield &amp; Barbican (Culture Mile) 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.</p> |  |
|--|--|--|

The assessment identified that many of the Proposed Submission 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. 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 waste and the economic implications of restrictions on tall buildings to protect views of historic landmarks.

The detailed IIA findings are presented in Appendix 6 IIA Assessments: Proposed Submission Draft. A summary of the assessment findings is provided below.

**Table NTS2: Summary assessment of the impacts of Proposed Submission 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 attraction | 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               | ↑               | ↑                                  | -                                    | -               | -                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | ↑       | ↑                              | ↑↑     | ↑         | ↑↑                     |
| S2                                  | Safe & Secure City                     | ↑↑↑             | ↑↓                                 | ↑↑                                   | -               | -                | -                        | -                                 | ↓           | -                               | ↑↓                     | ↑       | -                              | ↑      | -         | ↓                      |
| S3                                  | Housing                                | ↑↓              | ↑                                  | -                                    | -               | -                | -                        | -                                 | -           | -                               | ↑↑                     | ↑       | -                              | -      | -         | ↑↑                     |
| Support a Thriving Economy          |  |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S4                                  | Offices                                | ↑↑↑             | ↑↓                                 | -                                    | ↑↓              | ↑↓               | ↑↓                       | ↑↓                                | -           | -                               | ↑↓                     | ↑↓      | -                              | -      | ↑↑        | ↑                      |
| S5                                  | Retail                                 | ↑               | ↑                                  | ↑↓                                   | ↑               | ↓                | ↓                        | ↓                                 | -           | -                               | ↑↓                     | ↑↓      | ↑                              | -      | -         | ↑                      |
| S6                                  | Culture, Visitors & Night-Time Economy | ↑↑              | ↑                                  | ↑                                    | ↑               | ↓                | ↑↓                       | ↓                                 | ↑           | ↑↓                              | ↑↓                     | ↑↓      | ↑                              | ↑      | ↑         | ↑                      |
| S7                                  | Smart Utilities & Infrastructure       | ↑↑              | ↑                                  | -                                    | ↑↓              | ↑                | ↑                        | ↑                                 | -           | -                               | ↑                      | -       | -                              | -      | -         | -                      |
| Shape Outstanding Environments      |  |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S8                                  | Design                                 | ↑               | ↑                                  | ↑                                    | ↑               | ↑                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | -       | -                              | ↑      | -         | ↑                      |
| S9                                  | Vehicular Transport & Servicing        | ↑↑<br>↓↓        | ↑                                  | ↑                                    | -               | ↓                | ↑                        | ↑↓                                | -           | -                               | ↑↑                     | -       | -                              | ↑      | -         | -                      |
| S10                                 | Active Travel & Healthy Streets        | ↓               | ↑↓                                 | ↑                                    | -               | -                | ↑                        | ↑                                 | ↑           | -                               | ↑↑<br>↓↓               | -       | -                              | ↑      | -         | ↑                      |
| S11                                 | Historic Environment                   | ↑↓              | ↑↑↑                                | -                                    | ↑               | -                | -                        | -                                 | ↑           | ↑                               | -                      | -       | -                              | -      | ↑         | ↓                      |
| S12                                 | Tall Buildings                         | ↑↑<br>↓↓        | ↑                                  | ↑                                    | ↑↑              | -                | ↑                        | -                                 | ↑           | -                               | -                      | -       | -                              | -      | -         | ↑                      |
| S13                                 | Protected Views                        | ↓↓              | ↑                                  | -                                    | ↑↑              | -                | -                        | -                                 | -           | -                               | -                      | -       | -                              | -      | -         | -                      |
| S14                                 | Open Spaces & Green Infrastructure     | ↑               | ↑                                  | ↑↓                                   | ↑↓              | -                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | -       | ↑                              | ↑      | -         | ↑                      |
| S15                                 | Climate Resilience & Flood Risk        | ↑               | ↑                                  | -                                    | ↓               | -                | ↑                        | ↑                                 | ↓           | ↑                               | -                      | ↑       | ↑                              | ↑      | -         | -                      |
| S16                                 | Circular Economy & Waste               | ↑↑              | ↑↑                                 | ↑↑                                   | -               | ↑↑               | ↑↑                       | ↑↑                                | -           | -                               | ↑↑                     | -       | -                              | ↑↑     | -         | -                      |
| Key Areas of Change                 |  |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S17                                 | Thames Policy Area                     | ↑↑              | ↑↑                                 | ↓                                    | ↑               | ↑↑               | ↑↑                       | ↑                                 | ↑           | ↑↑                              | ↓                      | -       | ↑                              | -      | -         | -                      |
| S18                                 | Blackfriars                            | ↑               | ↑                                  | ↓                                    | ↑               | ↑↑<br>↓↓         | ↑                        | ↓                                 | ↑           | ↑                               | ↑                      | -       | ↑                              | -      | -         | -                      |
| S19                                 | Pool of London                         | ↑               | ↑                                  | ↓                                    | ↑↑              | ↑↑<br>↓↓         | ↑                        | ↓                                 | ↑           | ↑                               | ↑                      | ↓       | ↑                              | -      | -         | -                      |
| S20                                 | Aldgate, Tower & Portsoken             | ↑               | ↑                                  | ↓                                    | ↑↑              | ↓                | ↓                        | ↓                                 | ↑           | ↑                               | ↑↓                     | ↑       | ↑                              | ↑      | ↑         | ↑                      |

| 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 |
|----------------|------------------------|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|-----------------------------------|-------------|---------------------------------|------------------------|---------|--------------------------------|--------|-----------|------------------------|
| S21            | City Cluster           | ↑↑↑             | ↓                                  | ↑                                    | ↓               | ↓                | ↑↓                       | ↑↓                                | ↓           | -                               | ↑↓                     | -       | ↑                              | ↑      | ↑         | -                      |
| S22            | Fleet Street & Ludgate | ↑               | ↑                                  | ↑                                    | ↑↑              | -                | -                        | -                                 | ↑           | ↑                               | ↑↑↓                    | ↓       | -                              | -      | -         | -                      |
| S23            | Smithfield & Barbican  | ↑↑              | ↑                                  | ↓                                    | ↑↑              | ↓                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | ↓       | ↑↑                             | -      | ↑         | -                      |
| S24            | Culture Mile           | ↑↑              | ↑                                  | ↓                                    | ↑               | ↓                | -                        | -                                 | -           | -                               | ↑                      | ↓       | ↑↑                             | -      | ↑         | ↑                      |
| S25            | Smithfield             | ↑↑              | ↑                                  | ↓                                    | ↑↑              | ↓                | -                        | -                                 | -           | -                               | ↑                      | ↓       | ↑↑                             | ↑↑     | -         | -                      |
| S26            | Liverpool Street       | ↑               | ↑                                  | ↑↓                                   | ↓               | ↓                | -                        | -                                 | ↑           | ↑                               | ↑↑                     | -       | ↑↑                             | ↑      | -         | -                      |
| Implementation |                        |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S27            | Planning contributions | ↑↑↑             | ↑                                  | ↑                                    | -               | -                | -                        | ↑                                 | -           | -                               | ↑↑                     | ↑↑      | -                              | -      | ↑↑        | ↑↑                     |

Key to Table NTS2:

|    |  |   |
|----|--|---|
| -  | 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 (minor rather than significant) | Consider policy wording changes and/ or mitigation and monitoring |
| ↓  | Negative impact  | Consider policy changes and/or mitigation                         |
| ↓  | Significant negative impact  | Consider changing the policy                                      |
| -  | Negligible Impact  | Negligible 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 |

## 7) Mitigation measures

A small number of negative effects and a larger number of uncertainties were identified. During the assessment process, certain mitigation measures were identified that could be used to deal with these uncertainties. The assessment tables in Appendix 6 set out in detail the mitigation measures identified for each set of policies and whether these were taken forward in the Proposed Submission 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.

## 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 consequences of the UK's departure from the EU after the expiry of the transition period in December 2020. Another difficulty is the uncertainty created by ongoing changes to the strategic planning context, including changes to national planning policy and guidance and the London Plan. In August 2020, the Planning White Paper was published for consultation. It proposes a number of reforms to the planning system but the details of these reforms are yet to be confirmed.

Uncertainty has also been created by the COVID-19 pandemic, which has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people's health and wellbeing, and economically. The longer term effects of the pandemic are uncertain and much depends on the evolution of the virus and society's ability to develop and rollout vaccines or treatments, together with potential longer term changes in behaviour such as remote vs. office-based working and online vs. high street-based shopping.

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 and other uses; infrastructure and security; river related uses and river transport; hotels and business accommodation; historic environment; tall buildings and views protection; energy & CO<sub>2</sub> emissions; air quality; transport; waste; flood risk; open spaces; retail; housing numbers, location and tenure; and 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 draft monitoring framework has been 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 finalised on adoption of the City Plan 2036.

## How to comment

### City Plan 2036

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

The City of London Corporation is consulting on its Proposed Submission version of the Local Plan which sets out the future development of the Square Mile. The City Plan 2036 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.

The consultation period will start on the 19<sup>th</sup> March 2021 and run until the 7<sup>th</sup> May 2021.

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

For more information visit our website: [www.cityoflondon.gov.uk/cityplan2036](http://www.cityoflondon.gov.uk/cityplan2036) or email [localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk).

To be kept updated on the City's consultations please email [localplan@cityoflondon.gov.uk](mailto: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 (SEA), 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 Proposed Submission Draft City Plan 2036 (Regulation 19) 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; and the assessment stage – developing and refining alternatives and assessing effects as the City Plan 2036 developed to this Proposed Submission version. The findings of the IIA and how this has influenced the Proposed Submission Draft City Plan 2036 are set out along with the next steps which will ensure that any changes recommended at examination are assessed and mitigation and monitoring is put in place.
- 2.1.3. The IIA was undertaken by the City of London Corporation with LUC undertaking an independent audit to ensure that both the City Plan 2036 and IIA comply with the relevant legal and statutory requirements, whilst also taking into account best practice guidance. As noted below, following the COVID-19 pandemic, changes to the Use Classes Order, and an advisory visit from a Planning Inspector, final changes were made to the Proposed Submission Draft City Plan 2036. The final IIA was updated to reflect these changes with help from LUC.

### 2.2 The 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 15 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 and virtually 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, culture, 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 just over 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, the London Plan and government guidance shaped the evolution of the draft City Plan 2036 which underwent consultation in November 2018 (regulation 18). Further changes have been incorporated into the Proposed Submission version of the City Plan 2036 taking account of consultation responses, legislative changes, new evidence and the findings of the IIA. The Proposed Submission Draft of the City Plan 2036 underwent an additional round of changes following the COVID-19 pandemic, changes to the Use Classes Order, and an advisory visit from a Planning Inspector. Submission is expected in summer 2021 followed by examination and adoption in 2022.

## 2.3 Policy context

- 2.3.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 set 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 Proposed Submission Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for

Housing, Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).

2.3.2. The National Planning Policy Framework (February 2019) 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 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 well advanced, with the Mayor publishing an Intend to Publish version on 9th December 2019 followed by a revised Publication version on 21<sup>st</sup> December 2020, which responds to directions

issued by the Secretary of State in March and December 2020. Account has been taken of the emerging policies in the new London Plan, which have increasing weight as adoption approaches.

- 2.3.7. In August 2020, the Planning White Paper entitled 'Planning for the future' was published for consultation over a period of 12 weeks. The document proposes a number of reforms of the planning system, with the details yet to be confirmed. The Ministry for Housing, Communities & Local Government is currently working through the consultation responses received on the Planning White Paper.
- 2.3.8. The Government's planning reform agenda has resulted in a number of changes to national legislation and guidance. In August 2020, a new permitted development right was introduced that allows the demolition and rebuilding of vacant and redundant office and light industrial buildings into dwellings, without planning permission, subject to various conditions and criteria. New permitted development rights also now enable the upward extension of existing post-war built homes by two storeys.
- 2.3.9. In September 2020, a new Use Classes Order was introduced that includes a new Class E use, which encompasses commercial, business and services uses. These uses can be converted to other Class E uses without planning permission. In addition, some uses which were previously given their own class have been moved into the 'sui generis' category, meaning they will no longer belong to a specific class. These changes and the changes outlined above have been reflected throughout the Proposed Submission Draft of the City Plan 2036.

## 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 describes 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 Regulations and where each element is covered in this report.

**Table 1: Meeting the requirements of the SEA Regulations**

| SEA Regulations requirements   | Where covered in the IIA report   |
|--|---|
| <p><b>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):</b></p>   |   |
| <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>   | <p>Sections 2.2-2.3, Section 4.1, Sections 5.1-5.2, Section 5.4 and Appendix 1 Other Plans and Programmes</p> |
| <p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>   | <p>Section 4.2 and Appendix 2 Baseline information</p>  |
| <p>c) The environmental characteristics of areas likely to be significantly affected.</p>  | <p>Sections 4.2-4.3 and Appendix 2 Baseline information</p>   |
| <p>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.</p>  | <p>Section 4.3</p>  |
| <p>e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</p>   | <p>Section 3.5, Section 4.1, and Appendix 1 Other Plans and Programmes</p>                                    |
| <p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).</p> | <p>Section 5 and Appendix 6 IIA Assessments (Proposed Submission City Plan 2036)</p>                          |
| <p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>  | <p>Section 7</p>  |
| <p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of</p>  | <p>Section 3</p>  |

|  |  |
|--|--|
| how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.   |  |
| i) A description of measures envisaged concerning monitoring in accordance with Reg. 17.   | Section 8  |
| j) A non-technical summary of the information provided under the above headings.   | Section 1  |
| The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)). | Addressed throughout the IIA report  |
| <b>Consultation requirements</b>   |  |
| <ul style="list-style-type: none"> <li>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).</li> </ul>  | <ul style="list-style-type: none"> <li>Scoping consultation with statutory consultees carried out 11/1/2016-29/2/2016; comments and responses set out in Appendix 3</li> </ul>   |
| <ul style="list-style-type: none"> <li>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</li> </ul>   | <ul style="list-style-type: none"> <li>Issues and Options consultation carried out 19/9/2016-31/10/2016; comments on the IIA and responses set out in Appendix 3</li> <li>Draft City Plan consultation carried out November 2018; no comments were received on the IIA</li> <li>Proposed Submission City Plan consultation is the current stage</li> </ul> |
| <ul style="list-style-type: none"> <li>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>  | The Local Plan is not expected to have significant effects on other EU Member States.  |
| <b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b>  |  |
| <b>Provision of information on the decision:</b><br>When the plan or programme is adopted, the public and any countries consulted under Reg.   | To be confirmed in the Adoption Statement after the Local Plan is adopted. However, draft information is   |

|   |   |
|---|---|
| <p>14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted;</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring.</li> </ul> | <p>included in the IIA at Proposed Submission stage as follows:</p> <p>Reasons for choosing the plan in the light of the reasonable alternatives – Section 5.5</p> <p>How the environmental report was taken into account - Section 6</p> <p>Monitoring framework - Section 8</p> |
| <p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>  | <p>To be addressed after the Local Plan is adopted.</p>   |
| <p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>  | <p>The IIA report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met. LUC's conclusions on quality are provided in a separate Audit Statement.</p>              |

## 2.5 How to comment on this report

2.5.1. This IIA report has been issued for consultation alongside the Proposed Submission Draft of the City Plan 2036 (Reg 19) in March 2021. For more information visit our website: [www.cityoflondon.gov.uk/cityplan2036](http://www.cityoflondon.gov.uk/cityplan2036) or email [localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk).

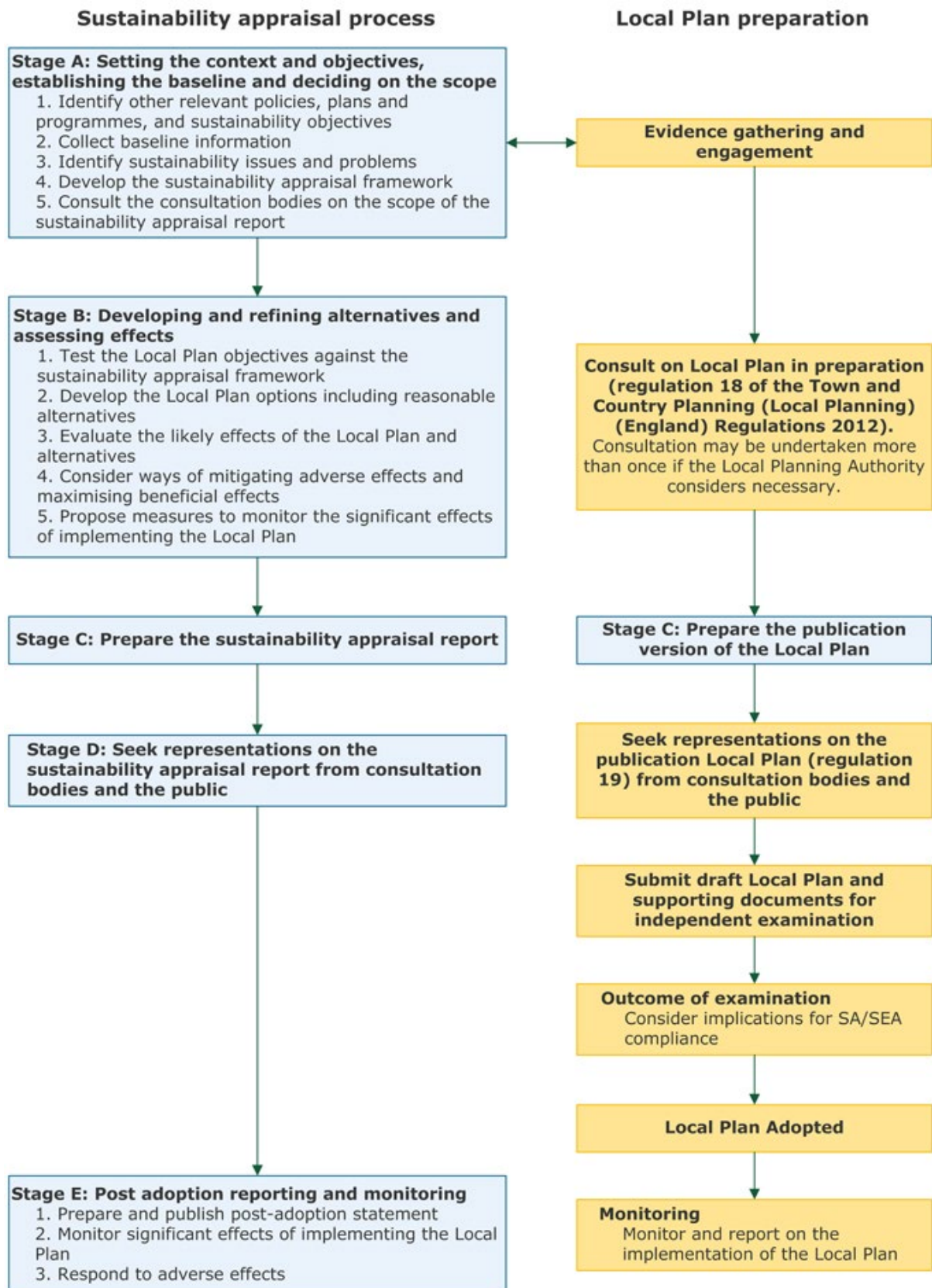
## 3. Approach to IIA

### 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. Figure 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

Figure 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, the draft and Proposed Submission 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 1) 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. A Health Impact Assessment scoping, assessing the policies against the City's health objectives, is included as an annex to this report.

## 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. An Equalities Impact Assessment scoping, assessing the policies against the 9 protected characteristics, is included as an annex to this report.

## 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><b>1) Economic growth</b></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><b>Global financial centre, financial &amp; business services, tech &amp; IT, supporting businesses – hotels, retail.</b></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><b>2) Attractive built environment and public realm</b></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><b>Built environment, public realm, digital connectivity, well designed, smart cities, supporting infrastructure.</b></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> |
| <p><b>3) Safe environment and crime reduction</b></p> <p>To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.</p>  | <p><b>Crime reduction, antisocial behaviour, fear of crime, security, anti-terrorism</b></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>  |

| Objective  | Criteria  |
|--|---|
|  | <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><b>4) Heritage Assets</b></p> <p>To conserve or enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.</p>       | <p><b>Historic environment, conservation areas, listed buildings, scheduled monuments, historic parks and gardens, world heritage sites, archaeological remains</b></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> |
| <p><b>5) Improved Waste management</b></p> <p>To decouple waste generation from economic growth enabling a circular economy<sup>1</sup> in the City that minimises waste arisings.</p> | <p><b>Decoupling waste generation from economic growth, materials efficiency, water efficiency, circular economy.</b></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>   |

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<sup>1</sup> 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>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>   |
| <p><b>6) Improved environmental protection</b></p> <p>To maximise protection and enhancement of the natural environment.</p> | <p><b>Air quality, water quality and resources, land contamination, light &amp; noise.</b></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> |

| Objective   | Criteria  |
|---|---|
| <p><b>7) Climate change mitigation and resilience</b></p> <p>To mitigate climate change, assist in maintaining energy security and promote climate change resilience.</p> | <p><b>Climate change mitigation, carbon emission reduction, energy security, climate change resilience, urban heat island</b></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>  |
| <p><b>8) Improved Open Spaces</b></p> <p>To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.</p>               | <p><b>Open space provision, design for inclusivity and accessibility, multiple uses.</b></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><b>9) Improved Biodiversity and Urban Greening</b></p> <p>To improve opportunities for biodiversity and increase the</p>   | <p><b>Biodiversity, habitats and species</b></p> <p>Will the policy increase protection and improve opportunities for biodiversity in particular black redstarts, sparrows, bats and stag beetles?</p>  |

| Objective  | Criteria  |
|--|---|
| provision of natural environments.   | <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>   |
| <p><b>10) Transport &amp; Movement</b></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><b>Efficient public transport, low emissions CO2, NOx, particulates, air quality exposure, road safety, promote active transport, delivery vehicles, reduce need to travel.</b></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><b>11) Housing</b></p> <p>To deliver an environment that meets the needs and expectations of residents.</p>   | <p><b>Housing, residential amenity</b></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><b>12 Social and cultural facilities</b></p> <p>To provide suitable social and cultural facilities for all the City's communities</p>   | <p><b>Vibrant social environment, leisure, cultural opportunities</b></p> <p>Will the policy protect and enhance social, community and cultural facilities which meet the expectations of City workers and residents?</p>   |

| Objective   | Criteria   |
|---|--|
|   | <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>   |
| <p><b>13) Improved Health</b></p> <p>To improve the health of the City's resident, worker and student populations</p> | <p><b>Healthy lifestyles, health facilities, access to healthy food, mental health.</b></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><b>14) Improved Education</b></p> <p>To enable excellence in education for all the City's communities.</p>         | <p><b>Education facilities preschool to higher education and professional development.</b></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>   |



| Objective  | Criteria   |
|--|--|
|  | Will the policy provide training and job opportunities for City residents and City Fringe residents?   |
| <p><b>15) Equality and inclusion</b></p> <p>To enable social and economic inclusion in and around the City for workers resident and visitors</p> | <p><b>Equality, social integration and wellbeing, poverty reduction, opportunity for all.<sup>2</sup></b></p> <p>Will the policy contribute to the elimination of unlawful discrimination, harassment &amp; victimisation?</p> <p>Will the policy advance equality of opportunity between people who share a protected characteristic<sup>3</sup> and those who don't?</p> <p>Will the policy foster good relations between people who share a protected characteristic and those who don't?</p> <p>Will the policy reduce economic inequality for individuals and communities in and around the City?</p> |
| <p><b>Key</b></p>  | <p>Equality Impact Assessment (EqIA) screening criteria</p> <p><a href="#">Health Impact Assessment (HIA) screening criteria</a></p> <p>All criteria are important as Sustainability Appraisal (SA) criteria</p>   |

3.5.5. The IIA 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.

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<sup>2</sup> 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."

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

**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<br>(minor rather than significant) | Consider policy wording changes and/ or mitigation and monitoring |
| ↓ | Negative impact   | Consider policy changes and/or mitigation                         |
| ↓ | Significant negative impact   | Consider changing the policy                                      |
| - | Negligible Impact   | Negligible 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 |

3.5.6. 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          |
| 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 general 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 in 2015
- 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.

3.6.4. At draft plan stage, under Policy S4 Offices additional alternatives were assessed to determine the appropriate level of office development. Assessment concluded that a medium level of growth (2 million square metres) over the Plan period would be the overall most beneficial against the IIA objectives. This level of development has been included in Policy S4.

### 3.7 Difficulties encountered

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

3.7.2. The City Corporation prepared a Transport Strategy alongside preparation of the City Plan 2036. While this brings benefits in terms of policy alignment, it 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 City Plan 2036 has been prepared against the background of national reforms to the planning system including a new NPPF and 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 and has responded to changes as London Plan policies have changed. It is now aligned with the Publication version of the London Plan. This has created uncertainties for the City's Local Plan review as the strategic planning context is subject to considerable ongoing change.

3.7.4. In August 2020, the Planning White Paper entitled 'Planning for the future' was published for consultation. The document proposes a number of reforms of the planning system but many of the details are yet to be confirmed, which has caused a level of uncertainty in the IIA. However, impacts of the changes will be closely monitored to ensure that any unintended adverse effects are picked up quickly.

3.7.5. Uncertainty has also been created by the COVID-19 pandemic, which has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people's health and wellbeing, and economically. The longer term effects of the pandemic are uncertain and much depends on the evolution of the virus, society's ability to develop and rollout effective vaccines or treatments, together with potential longer term changes in behaviour such as remote vs. office-based working and online vs. high street-based shopping.

## 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

4.1.2. Following the United Kingdom's (UKs) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Relevant EU legislation has still been referred to in this report unless the corresponding UK legislation has been amended.

#### 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 2012
- City of London Waste Strategy 2013-2020
- City of London Air Quality Strategy 2019-2024
- City of London Noise Strategy 2016-2026
- City of London Climate Action Strategy 2020-2027
- 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 2021-2027
- City of London Housing Strategy 2019-2023
- City of London Housing Asset Management Strategy 2015-20

- City of London Joint Health and Wellbeing Strategy, 2017 – 2020
- City of London Education Strategy 2019-2023
- City of London Cultural and Creative Learning Strategy 2019-23
- City of London Skills Strategy 2019-23
- City of London Transport Strategy 2019
- City of London Road Danger Reduction and Active Travel Plan 2018-2023
- City of London Local Implementation Plan 3 2019/20 – 2021/22
- City of London Thames Strategy SPD 2015
- City of London Cultural Strategy 2018-22
- City of London Visitor Destination Strategy 2019-2023
- City of London Police Policing Plan 2020-2023
- Safer City Partnership Strategic Plan 2019-2022
- City of London Statement of licensing policy 2017
- The City Cluster Vision 2019
- Culture Mile Look and Feel Strategy 2018
- Fenchurch & Monument Area Enhancement Strategy 2013
- Bank Area Enhancement Strategy 2013
- Chancery Lane Area Enhancement Strategy 2009
- Cheapside & Guildhall Area Enhancement Strategy 2015
- Barbican & Golden Lane Area Strategy 2015
- Fleet Street Courts and Lanes Design Strategy 2003
- Riverside Walk Enhancement Strategy 2015
- Aldgate and Tower Area Enhancement Strategy 2012
- Liverpool Street Area Enhancement Strategy 2013
- West Smithfield Area Enhancement Strategy 2013
- City of London Lighting Strategy 2018
- City of London Historic Environment Strategy 2017
- City of London Sport and Physical Activity Strategy 2015-2020

#### Other Regional Plans and Programmes

- The London Plan 2015 consolidated with alterations since 2011
- London Plan – Publication 2020
- London Environment Strategy 2018
- The Mayor's Transport Strategy 2018
- Mayor of London River Action Plan 2013
- The London Health Inequalities Strategy 2018
- The Mayor's Cultural Strategy; Culture for all Londoners 2018
- Mayor's Economic Development Strategy for London 2018
- Smarter London Together 2018
- London Infrastructure Plan 2050 (Update Report) 2015
- London Housing Strategy 2018
- Mayor's Police and Crime Plan 2017-2021

- Thames Estuary 2100 Plan
- Thames River Basin Management Plan 2015
- Westminster City Plan adopted 2016, being reviewed
- Camden Local Plan adopted 2017
- Islington Core Strategy and Development Management policies adopted 2011 and 2013, being reviewed
- Bunhill and Clerkenwell Area Action Plan (London Borough of Islington) Draft 2019
- Hackney Local Plan adopted 2020
- Tower Hamlets Local Plan adopted 2020
- Southwark Core Strategy adopted 2011 and saved policies from the 2007 Southwark Plan, being reviewed
- Lambeth Local Plan adopted 2015, being reviewed
- Bexley Local Plan – Core Strategy adopted 2012, being reviewed
- London View Management Framework SPG 2012
- London's World Heritage Sites - Guidance on settings SPG 2012
- Tower of London - World Heritage Site Management Plan 2016
- Tower of London - Local Setting Study 2010
- Mayor of London Character and Context SPG 2014
- Mayor of London CAZ SPG 2016
- Accessible London: Achieving an Inclusive environment 2014
- Mayor's Housing SPG 2016
- Mayor's Affordable Housing and Viability SPG 2017
- Mayors Culture and Night-Time Economy SPG 2017
- Mayor's Sustainable Design and Construction SPG 2014
- Mayor's Strategy for Equality, Diversity and Inclusion 2018
- Mayor's Social Infrastructure SPG 2015
- Mayor's Skills for Londoners Strategy 2018
- Green infrastructure and Open Environments – The All London Green Grid 2012
- Safeguarded Wharves Review 2018-2019

#### Other National Plans and Programmes

- National Planning Policy Framework (NPPF) 2019
- National Planning Practice Guidance (NPPG)
- Resources and Waste Strategy for England 2018
- National Planning Policy for Waste 2014
- BEIS Clean Growth Strategy 2018
- The National Adaptation Programme - 2018-2023
- Historic England Advice Note 4 Tall Buildings 2015
- Historic England Good Practice Advice note - the Historic Environment in Local Plans (GPA1) 2015

- Historic England Good Practice Advice note - Managing significance in decision taking in the Historic Environment (GPA2) 2015
- Historic England Good Practice Advice note: The setting of heritage assets (GPA3) 2017
- Historic England Advice note 1: Conservation area appraisal, designation and management 2019
- Historic England Advice note 2: Making changes to heritage assets 2016
- 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 2018
- Fair Society, Healthy Lives, The Marmot Review 2010
- A Green Future: Our 25 Year Plan to Improve the Environment 2018
- Housing and Planning Act 2016
- Housing White Paper: Fixing our Broken Housing Market 2017
- Industrial Strategy: Building a Britain fit for the Future 2017
- Clean Air Strategy 2019
- Wildlife and Countryside Act (as Amended) 1981
- Energy Act 2013
- The Conservation of Habitats and Species Regulations 2018
- Flood and Water Management Act 2010

#### Other International Plans and Programmes

- UN Strategic Plan for Biodiversity 2011-2020, including Biodiversity Targets
- EU Biodiversity Strategy for 2030
- EU Environment Action Programme to 2030
- 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 2015
- 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 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 2011
- 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 2008
- Habitats Directive 92/43/EEC 1992

## 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. Employment has risen steadily from 332,000 in 2009 to 522,000 in 2018, while the City's output rose about 5% per year in the five years up to 2018, slightly above the figure of 4% for the UK. However, the Covid-19 pandemic has impacted this trend. Financial and business services employment has fallen by 1.1% in London. It is forecasted that this downward trend will continue throughout 2021 leading to an additional drop by 5%. 2022 is predicted to experience a growth of 3.4%. It was estimated that as of 31st March 2020 there was 9.3 million m<sup>2</sup> of gross office floor-space within the City (City of London Corporation, Office Floorspace in the City of London). Changes in working practices as a result of Covid-19 are likely to result in lower occupation densities in the City's office buildings with a corresponding need for supporting breakout space.

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. Although the City of London has been significantly impacted by the COVID-19 pandemic, economic modelling by the GLA suggests a gradual return of economic activity and a return to economic and employment growth. London and the City could lose out to other



centres either elsewhere in the UK or further afield affecting the UK economy. In appraising the effects of the City Plan 2036 against the likely future baseline in the absence of the Plan, no major changes to the current baseline have been assumed with regard to the UK's departure from the EU. As the effects emerge of the UK's departure from the EU, including future trade arrangements, they will be considered by the City Corporation and any necessary adjustments to planning policy made via review of the City Plan and accompanying further sustainability appraisal at that time. 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 was a net increase of open space from 31.35 hectares in 2013/14 to 32.13 hectares in 2018/19. This is complemented by 42,600m<sup>2</sup> total green roof area supporting biodiversity (Local Plan monitoring report green roofs, March 2018). 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<sub>x</sub> and particulates. The City remains free from contaminated land. There has been a significant 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. Water quality in the Thames is likely to improve once the Thames Tideway Tunnel is completed. As Nationally Significant Infrastructure this will go ahead in the absence of the City Plan 2036, however associated public realm improvements will be implemented in line with the Local Plan. 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 have diminished 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 522,000 with a young age profile and 60/40 male/female gender balance. Social deprivation is relatively 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 as a result of Covid-19 and political uncertainty may result in the need for more flexible workspace and appropriate supporting services.

4.3.4. **Transport and movement** – Additional public transport is planned however less reliance on public transport as a result of Covid-19 and social distancing measures 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 employment growth 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, particularly following the shift to remote working as a result of the COVID-19 pandemic. 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 contribute a relatively 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 and more extreme weather events, must be incorporated into the design of buildings and public spaces if the City is to remain comfortable in future climate conditions.
- 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 is in place for the City's conservation areas, listed buildings and historic parks and gardens. The heritage assets within the City form part of a wider network of listed buildings and conservation areas, which illustrate London's rich history, extending into neighbouring boroughs and beyond. The Local Plan must respond to the future plans for cultural and heritage assets within and outside the City for example considering the impact of increased visitor numbers and access routes through the City. Development within the City must not detract from the historic significance and setting of assets elsewhere. Of particular importance in this context is the Tower of London World Heritage Site which lies just beyond the City's boundary to the east.
- 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 key landmark buildings, such as St Paul's Cathedral and the Tower of London, 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 usual residents and 1,400 second home owners<sup>4</sup> 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 and 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 and mental health problems, alcohol, drugs, smoking and air quality related health issues. The promotion and facilitation of healthy lifestyles for the City’s workers, residents and visitors must sit alongside the provision of health facilities for these communities. The health facilities at St Bartholomew’s hospital have recently undergone transformation as a cardiac and cancer centre of excellence and will continue to play a major regional role. The City provides 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 and 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

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<sup>4</sup> GLA 2016-based Demographic Projections – SHLAA DCLG based

of the City may change from its previous 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 and 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 counter terrorism, road safety, public order offences, antisocial behaviour, economic and cyber-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 and 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 (known as Culture Mile) 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 unduly compromised by the drive to intensify the north west of the City as a cultural destination. Visitor numbers are likely to increase from the current levels of 21.5 million trips 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.

**Table 4: Evolution of the City Plan 2036 objectives.**

| Objectives at I&O Stage  | Objectives at Proposed Submission Draft City Plan 2036 stage   |
|--|--|
| To maintain the City's position as the world's leading international financial and business centre;  | <b>Thriving Economy</b> - 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;   | <b>Key Areas of Change</b> - 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 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 | <b>Outstanding Environments</b> - To shape the future City, ensuring that it is physically and virtually well connected, sustainable and responsive, resilient 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;                              | <b>Outstanding Environments</b> - 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.  | <b>Flourishing Society</b> - 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 aspirations for the City and the objectives of the City Plan 2036 (Table 5).

**Table 5: Comparison of City Plan 2036 Objectives with IIA Objectives**

Key

|    |   |
|----|---|
| √  | IIA objectives align with City Plan 2036 objectives                 |
| NA | No association between IIA objectives and City Plan 2036 objectives |

| Plan objectives →                  | <b>Contribute to a Flourishing Society</b><br>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. | <b>Support a Thriving Economy</b><br>To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture. | <b>Shape Outstanding Environments</b><br>To shape the future City, ensuring that it is physically and virtually well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets | <b>Key Areas for Change</b><br>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 ↓                   | IIA objectives ↓  | IIA objectives ↓   | IIA objectives ↓   | IIA objectives ↓   |
| Economic growth                    | √   | √  | √  | √  |
| Attractive built environment       | √   | √  | √  | √  |
| Safe environment & crime reduction | √   | NA   | √  | NA   |
| Heritage assets                    | NA  | NA   | √  | √  |
| Improved waste management          | NA  | NA   | √  | NA   |
| Environmental protection           | NA  | NA   | √  | NA   |
| Climate change                     | NA  | NA   | √  | NA   |
| Open space                         | √   | NA   | √  | √  |
| Biodiversity and greening          | NA  | NA   | √  | NA   |
| Transport & movement               | √   | √  | √  | √  |
| Housing                            | √   | NA   | √  | NA   |
| Social and cultural facilities     | √   | √  | √  | √  |
| Improved health                    | √   | NA   | √  | NA   |
| Improved education                 | √   | √  | NA   | √  |
| Equality & inclusion               | √   | NA   | √  | NA   |

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 Contribute 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.

### 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 general 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 were taken forward into the draft and Proposed Submission versions of the City Plan 2036. Table 6 shows the alternatives considered with the preferred approach highlighted in green.

**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 and Proposed Submission City Plan 2036 |
|--------------------------------------|---|--|--|---------------------------------|---|
| Office protection                    | Protect offices in commercial core only   | Protect offices throughout the City  | NA   | NA                              | Thriving Economy Offices  |
| Balance of land uses                 | Maintain City's B1 office employment focus  | Diversify to allow more mixed-use serviced 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 instigating a more collaborative approach to implementation and funding | Promote infrastructure improvements associated with each site in line with current planning policy | NA   | NA                              | Thriving Economy Smart infrastructure and Utilities                       |
| Safety and 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 | NA                              | Flourishing Society Safe and 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 | NA   | 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                | NA  | NA   | Outstanding Environment Vehicular Transport and 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 considerations | NA  | NA   | Key Areas of Change Thames Policy Area                    |
| 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                         | NA  | NA   | 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 | NA | Outstanding Environment Tall Buildings and Protected Views                                  |
| Energy and CO2 emissions            | Assist developers to achieve zero carbon by strategic planning for energy                    | Continue the current practice of site by site energy planning | NA   | NA | Outstanding Environment Design  |
| Air quality                         | Implement local solutions such as reassignment of vehicle space and stricter emission limits | Employ London-wide initiatives only                           | NA   | NA | Flourishing Society Healthy and Inclusive City  |
| Transport and public realm          | Site by site approach to transport & public realm  | Local Plan strategic approach to transport and public realm   | NA   | NA | Outstanding Environment Vehicular Transport and servicing Active Travel and Healthy Streets |

|             |  |   |  |    |   |
|-------------|--|---|--|----|---|
| Transport   | Prioritise public transport  | Prioritise pedestrian and cycle movement  | Manage vehicle movement through restrictions and consolidation centres             | NA | Outstanding Environment<br>Vehicular Transport and servicing<br>Active Travel and 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                                     | NA | Outstanding Environment<br>Circular Economy and Waste   |
| Flood risk  | Require flood resilience measures in development schemes at risk of flooding                             | Rely on building owners to install flood resilience measures                          | NA   | NA | Outstanding Environment<br>Climate Resilience and Flood Risk                                      |
| Open spaces | Protect all existing open space  | Allow development on some open space  | Require additional open space to be provided with development                      | NA | Outstanding Environment<br>Open Space and 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 | NA | Thriving Economy<br>Retail  |

|                                     |   |   |   |    |  |
|-------------------------------------|---|---|---|----|--|
| Housing numbers                     | Plan to meet London Plan target only (146 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 | NA | 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                      | NA  | NA | Flourishing Society Housing                  |
| Affordable housing                  | Retain current affordable housing targets                     | Increase level of affordable housing required   | NA  | NA | Flourishing Society Housing                  |
| Social and community infrastructure | Meet need for social and community infrastructure in the City | Work with partners in neighbouring boroughs to meet social and community infrastructure needs | NA  | NA | Flourishing Society Healthy & Inclusive City |

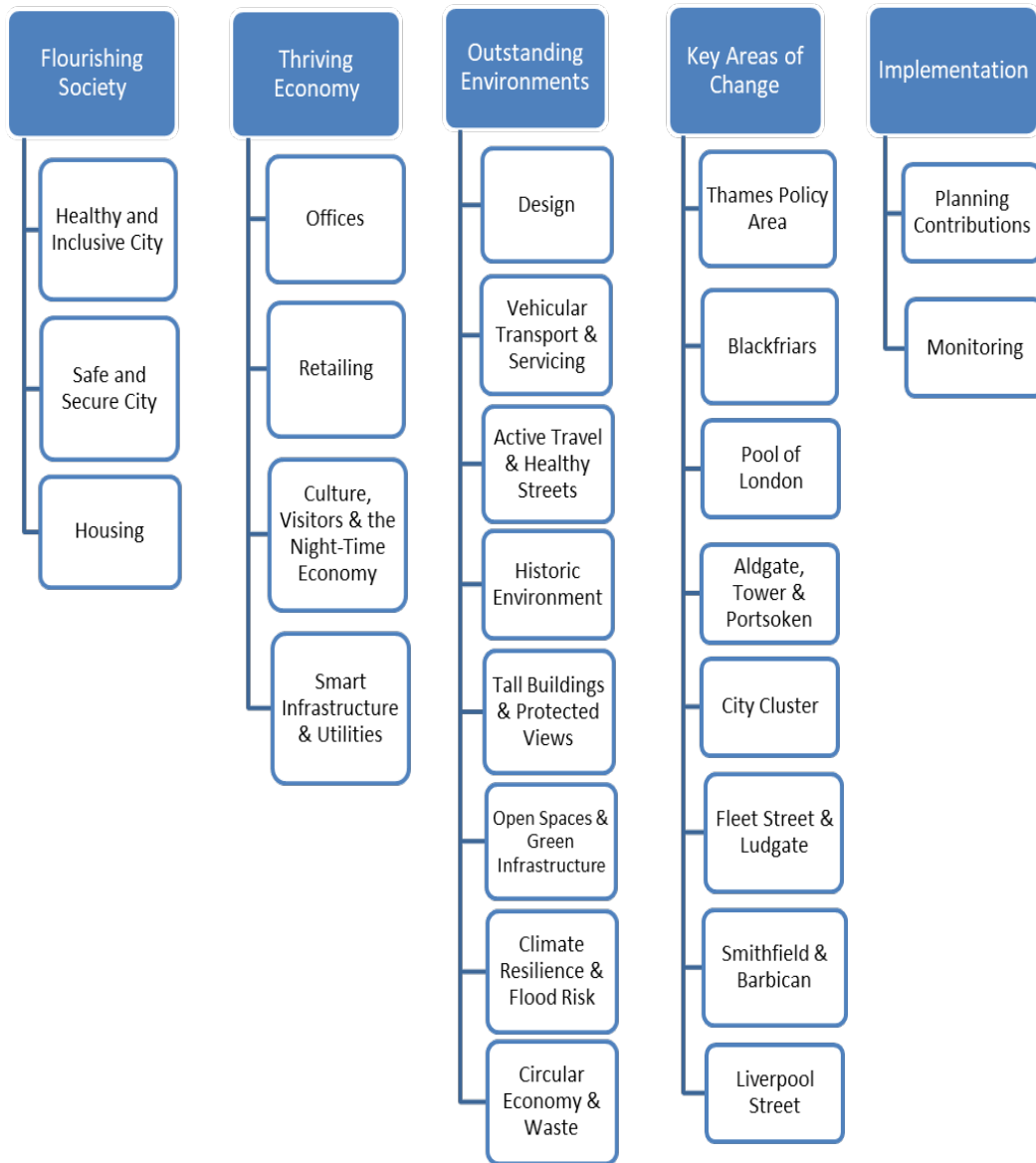
### Additional options considered after Issues and Options stage consultation

| Issue arising from the Local Plan 2015 | Alternative 1   | Alternative 2   | 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) | Thriving Economy Offices                                    |
| Urban greening                         | Continue to encourage greening associated with development          | Apply Urban Greening Factor target for major new development                                  | Outstanding Environment Open Space and 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.

**Figure 2: Structure of City Plan 2036**





## 5.5 Reason for selecting preferred option in the Proposed Submission Draft City Plan 2036 policies

5.5.1. For each policy in the Proposed Submission City Plan 2036 a policy story has been prepared (appendix 7) summarising 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: Reasons for the preferred approach**

| Policy topic | Proposed approach | Reason for choosing the proposed approach | Reason for rejecting alternatives |
|--------------|-------------------|---|-----------------------------------|
|--------------|-------------------|---|-----------------------------------|

### Flourishing Society

|                            |  |   |   |
|----------------------------|--|---|---|
| Healthy and Inclusive City | The policy draws together a range of health and inclusivity aspects including City specific air quality requirements and partnership working to provide social and 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 and Secure City       | Incorporate safety and security measures in development schemes and public realm, working with the City Police.  | A collective approach to safety and security issues provides the most effective outcomes. Collaboration with building owners on security relies on suitable designs which   | The small geographic area of the City makes segregation of night-time uses from residential areas impractical.  |

|         |  |   |   |
|---------|--|---|---|
|         | Balanced approach to night-time economy and residential amenity.   | are promoted through this policy. This encompasses the preferred approach of balancing licensing and planning requirements to reduce issues of conflict.  |   |
| Housing | Commit to meeting the London Plan housing target, providing housing in established residential clusters and seeking 35% affordable housing (50% on public land). | The policy is in conformity with London Plan targets 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. | Allowing housing throughout the City 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, although there is some flexibility regarding change to certain types of residential use within identified residential areas. | Protecting office floorspace only in the commercial core would have uncertain impacts and could result in insufficient office floorspace. The GLA has deleted references to defining a commercial core in the City in their Publication London Plan. |
|---------|--|--|--|

|   |   |  |   |
|---|---|--|---|
| Retailing                                 | Promote the development of four Principal Shopping Centres directing 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. While the role of PSCs as a focus for comparison and convenience shopping will be retained, changes to the Use Classes Order have diminished the ability of the Local Plan to prioritise these uses. 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. | 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, where they will not conflict with the business City. Criteria are set out to guide hotel development.  | This policy approach allows flexibility in the provision of visitor accommodation but sets out impacts that would be unacceptable. This should result in suitable accommodation which does not conflict with other land uses.  | Specifying particular types of visitor accommodation or areas where hotels should be focussed 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   | This more collaborative approach to utility infrastructure provides the basis for efficient provision of   | There is a danger that a site by site approach could lead to conflicts between the demands of existing and new development and  |

|  |  |  |   |
|--|--|--|---|
|  | with utility providers and prioritising collective infrastructure and route sharing. | services which minimises resource use. This approach provides greater resilience to the City as a whole. | 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 and 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.                     |
| Active Travel and 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                       | 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.           |

|                                    |  |  |  |
|------------------------------------|--|--|--|
|                                    |  | account of the needs of people with disabilities.  |  |
| Historic Environment               | The policy approach is to protect designated and non-designated heritage assets and their settings, albeit differentiating between the tests that apply to designated and non-designated heritage assets in line with the NPPF.  | 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 the London Plan.   |
| Tall Buildings and Protected Views | The Proposed Submission plan will allow tall buildings in appropriate locations where they meet 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 in 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 Views 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 St Paul's Cathedral. |

|                                      |   |   |  |
|--------------------------------------|---|---|--|
| Open Spaces and Green Infrastructure | Policy seeks to promote a greener City through protection of existing open spaces and trees, measures to enhance biodiversity and creating and maintaining a high-quality green infrastructure. A target Urban Greening Factor for development has been introduced. | The preferred approach recognises the contribution that open space, trees and urban greening makes to health and wellbeing, climate resilience, biodiversity and air quality improvement.   | The option of allowing development on some open space was rejected because of its detrimental impacts on the built 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 and 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 and Waste           | The preferred approach is to promote circular economy principles, promoting on site waste treatment for major sites. Continued reliance on  | 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.   |

|  |   |  |  |
|--|---|--|--|
|  | waste sites outside the City is proposed. |  |  |
|--|---|--|--|

## Key Areas of Change

|  |  |  |  |
|--|--|--|--|
| These policies identify new areas where significant change is likely over the plan period. | Seven Key Areas of Change have been identified: <ul style="list-style-type: none"> <li>- Blackfriars</li> <li>- Pool of London</li> <li>- Aldgate, Tower &amp; Portsoken</li> <li>- City Cluster</li> <li>- Fleet Street &amp; Ludgate</li> <li>- Smithfield &amp; Barbican</li> <li>- Liverpool Street</li> </ul> | These Key Areas of Change were identified through: <p>I&amp;O consultation responses</p> <p>Internal consultation with City Corporation officers</p> <p>Discussion with Members of the Local Plans Sub- Committee</p> <p>Informal engagement with other stakeholders and partners</p> <p>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. |
|--|--|--|--|

## 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. |
|--------------------------------------|--|--|---|

### 5.6 IIA findings – Proposed Submission Draft City Plan 2036 policies

5.6.1. The assessment identified that many of the Proposed Submission 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.

5.6.2. 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 waste and the economic implications of restrictions on tall buildings to protect views of historic landmarks. Mitigation for these and for the uncertain effects identified by the IIA are discussed in Section 7.

5.6.3. The detailed IIA findings are presented in Appendix 6 IIA Assessments:

Proposed Submission Draft. A summary of the assessment findings is provided below. Table 8 sets out the IIA scores for each of the City Plan 2036 strategic policies. This is followed by a narrative summary of the IIA findings for both these strategic policies and the suite of more detailed policies that supports each of them, focussing on those effects that are expected to be significant. The key to the symbols used in Tables 8 and 9 is as follows:

Key:

| -                 | Impact of implementing policy                                     | Response to IIA assessment                                       |
|-------------------|---|--|
| ↑ or ↑↑<br>or ↑↑↑ | Significant positive effect                                       | Consider whether further enhancement is possible                 |
| ↑ or ↑↑<br>or ↑↑↑ | Positive effect   | Consider whether further enhancement is possible                 |
| ⊠                 | Uncertain effect  | Consider policy wording changes and/or mitigation and monitoring |
| ↑↓                | Both positive and negative effect (minor rather than significant) | Consider policy wording changes and/or mitigation and monitoring |
| ↓ or ↓↓<br>or ↓↓↓ | Negative effect   | Consider policy changes and/or mitigation                        |
| ↓ or ↓↓<br>or ↓↓↓ | Significant negative effect                                       | Consider changing the policy                                     |
| -                 | Negligible effect   | Negligible effect  |

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



**Table 8: Summary of IIA findings for the Proposed Submission Draft City Plan 2036**

| 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 |
|--|--------------------------------------|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|-----------------------------------|-------------|---------------------------------|------------------------|---------|--------------------------------|--------|-----------|------------------------|
| <b>Contribute to a Flourishing Society</b> |                                      |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S1   | Healthy and Inclusive City           | ↑               | ↑                                  | -                                    | -               | -                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | ↑       | ↑                              | ↑↑     | ↑         | ↑↑                     |
| S2   | Safe and Secure City                 | ↑↑↑             | ↑↓                                 | ↑↑                                   | -               | -                | -                        | -                                 | ↓           | -                               | ↑↓                     | ↑       | -                              | ↑      | -         | ↓                      |
| S3   | Housing                              | ↑↓              | ↑                                  | -                                    | -               | -                | -                        | -                                 | -           | -                               | ↑↑                     | ↑       | -                              | -      | -         | ↑↑                     |
| <b>Support a Thriving Economy</b>          |                                      |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S4   | Offices                              | ↑↑↑             | ↑↓                                 | -                                    | ↑↓              | ↑↓               | ↑↓                       | ↑↓                                | -           | -                               | ↑↓                     | ↑↓      | -                              | -      | ↑↑        | ↑                      |
| S5   | Retail                               | ↑               | ↑                                  | ↑↓                                   | ↑               | ↓                | ↓                        | ↓                                 | -           | -                               | ↑↓                     | ↑↓      | ↑                              | -      | -         | ↑                      |
| S6   | Culture, Visitors Night Economy      | ↑↑              | ↑                                  | ↑                                    | ↑               | ↓                | ↑↓                       | ↓                                 | ↑           | ↑↓                              | ↑↓                     | ↑↓      | ↑                              | ↑      | ↑         | ↑                      |
| S7   | Smart Infrastructure and Utilities   | ↑↑              | ↑                                  | -                                    | ↑↓              | ↑                | ↑                        | ↑                                 | -           | -                               | ↑                      | -       | -                              | -      | -         | -                      |
| <b>Shape Outstanding Environments</b>      |                                      |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S8   | Design                               | ↑               | ↑                                  | ↑                                    | ↑               | ↑                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | -       | -                              | ↑      | -         | ↑                      |
| S9   | Vehicle Transport and Servicing      | ↑↓              | ↑                                  | ↑                                    | -               | ↓                | ↑                        | ↑↓                                | -           | -                               | ↑↑                     | -       | -                              | ↑      | -         | -                      |
| S10  | Active Travel and Healthy Streets    | ↓               | ↑↓                                 | ↑                                    | -               | -                | ↑                        | ↑                                 | ↑           | -                               | ↑↑↓                    | -       | -                              | ↑      | -         | ↑                      |
| S11  | Historic Environment                 | ↑↓              | ↑↑                                 | -                                    | ↑               | -                | -                        | -                                 | ↑           | ↑                               | -                      | -       | ↑                              | -      | ↑         | ↓                      |
| S12  | Tall Buildings                       | ↑↑              | ↑                                  | ↑                                    | ↑↑              | -                | ↑                        | -                                 | ↑           | -                               | -                      | -       | -                              | -      | -         | ↑                      |
| S13  | Protected Views                      | ↓↓              | ↑                                  | -                                    | ↑↑              | -                | -                        | -                                 | -           | -                               | -                      | -       | -                              | -      | -         | -                      |
| S14  | Open Spaces and Green Infrastructure | ↑               | ↑                                  | ↑↓                                   | ↑↓              | -                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | -       | ↑                              | ↑      | -         | ↑                      |
| S15  | Climate Resilience and Flood Risk    | ↑               | ↑                                  | -                                    | ↓               | -                | ↑                        | ↑                                 | ↓           | ↑                               | -                      | ↑       | ↑                              | ↑      | -         | -                      |
| S16  | Circular Economy and Waste           | ↑↑              | ↑↑                                 | ↑↑                                   | -               | ↑↑               | ↑↑                       | ↑↑                                | -           | -                               | ↑↑                     | -       | -                              | ↑↑     | -         | -                      |
| <b>Key Areas of Change</b>                 |                                      |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S17  | Thames Policy Area                   | ↑↑              | ↑↑                                 | ↓                                    | ↑               | ↑↑               | ↑↑                       | ↑                                 | ↑           | ↑↑                              | ↓                      | -       | ↑                              | -      | -         | -                      |
| S18  | Blackfriars                          | ↑               | ↑                                  | ↓                                    | ↑               | ↑↑               | ↑↑                       | ↓                                 | ↑           | ↑                               | ↑                      | -       | ↑                              | -      | -         | -                      |
| S19  | Pool of London                       | ↑               | ↑                                  | ↓                                    | ↑↑              | ↑↑               | ↓                        | ↓                                 | ↑           | ↑                               | ↑                      | ↓       | ↑                              | -      | -         | -                      |
| S20  | Aldgate, Tower and Portsoken         | ↑               | ↑                                  | ↓                                    | ↑↑              | ↓                | ↓                        | ↓                                 | ↑           | ↑                               | ↑↓                     | ↑       | ↑                              | ↑      | ↑         | ↑                      |
| S21  | City Cluster                         | ↑↑↑             | ↓                                  | ↑                                    | ↓               | ↓                | ↑↓                       | ↑↓                                | ↓           | -                               | ↑↓                     | -       | ↑                              | ↑      | ↑         | -                      |
| S22  | Fleet Street and Ludgate             | ↑               | ↑                                  | ↑                                    | ↑↑              | -                | -                        | -                                 | ↑           | ↑                               | ↑↑↓                    | ↓       | -                              | -      | -         | -                      |

| 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 |
|----------------|-------------------------|-----------------|------------------------------------|--------------------------------------|-----------------|------------------|--------------------------|-----------------------------------|-------------|---------------------------------|------------------------|---------|--------------------------------|--------|-----------|------------------------|
| S23            | Smithfield and Barbican | ↑↑              | ↑                                  | ↓                                    | ↑↑              | ↓                | ↑                        | ↑                                 | ↑           | ↑                               | ↑                      | ↓       | ↑↑↑                            | -      | ↑         | -                      |
| S24            | Culture Mile            | ↑↑              | ↑                                  | ↓                                    | ↑               | ↓                | -                        | -                                 | -           | -                               | ↑                      | ↓       | ↑↑↑                            | -      | ↑         | ↑                      |
| S25            | Smithfield              | ↑↑              | ↑                                  | ↓                                    | ↑↑              | ↓                | -                        | -                                 | -           | -                               | ↑                      | ↓       | ↑↑↑                            | ↑↑     | -         | -                      |
| S26            | Liverpool Street        | ↑               | ↑                                  | ↓                                    | ↓               | ↓                | -                        | -                                 | ↑           | ↑                               | ↑↑                     | -       | ↑↑                             | ↑      | -         | -                      |
| Implementation |                         |                 |                                    |                                      |                 |                  |                          |                                   |             |                                 |                        |         |                                |        |           |                        |
| S27            | Planning contributions  | ↑↑↑             | ↑                                  | ↑                                    | -               | -                | -                        | ↑                                 | -           | -                               | ↑↑                     | ↑↑      | -                              | -      | ↑↑        | ↑↑                     |

5.6.4. Healthy and 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 including public toilets, sport, play & recreation, and requirements for health impact assessment. These policies perform well against the IIA social and environmental objectives with significant positive effects identified in relation to environmental protection, climate mitigation & resilience, health, and equality and inclusion. 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, resulting in mixed effects against the economic growth IIA objective.

5.6.5. Safe and Secure City – This suite of policies were seen as essential for a high profile area like the City and promote 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 were therefore expected to result in significant positive effects in relation to the safe environment & crime reduction IIA objective, as well as minor positive effects against a range of other IIA objectives, including the economic objectives. The main uncertainty was whether security measures could negatively impact on accessibility.

5.6.6. 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. A significant positive effect was identified in relation to the

equality & inclusion IIA objective as a result of affordable housing provision. More generally, 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 term 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.

5.6.7. 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 commercial, business and service buildings or sites for “meanwhile uses”. Although the new Use Classes Order introduced in September 2020 enables existing offices to be converted to other Class E commercial, business and service uses without planning permission, conditions may be attached to permissions to prevent this. The office policies were seen to be significantly positive for economic growth with all other effects, including mixed positive and negative effects, being assessed as minor or uncertain. Mixed effects on the public realm were identified through increased pedestrian and vehicle numbers. Protection of offices was assessed as mixed minor positive and minor negative to housing capacity, reflecting changes to this policy at Proposed Submission stage which enable conversion of offices to certain types of residential use (e.g. Build to Rent and Co-living) within identified residential areas. Lack of clarity on the types of “meanwhile uses” that might be allowed led to uncertainty against environmental and social objectives for this policy.

5.6.8. Retailing – The retail policies define the quantity and quality of retail development, principal shopping centre designation and retail links, retail at ground floor level, specialist retail and markets. One of these policies, Strategic Policy S5 (Retailing), was seen as significantly positive for the economic growth objective. The policies also had minor positive effects on other economic and social objectives, with mixed effects on crime and anti-social behaviour due to the increased risk of minor crime and anti-social behaviour but increased surveillance in the more vibrant environment. Uncertain or minor 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.

5.6.9. Culture, Visitors and the 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. This included significant

positive effects in relation to the economic growth, built environment and public realm, heritage assets and social and cultural facilities 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 the night-time economy.

- 5.6.10. 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 uncertainties being associated with heritage assets and climate mitigation and resilience objectives. None of the effects identified were judged to be significant, including for assessments where mixed effects were identified.
- 5.6.11. Design - These policies cover a wide range of design issues associated with new development and public realm. This includes sustainability standards, pedestrian 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. None of the effects identified were judged to be significant, including for assessments where mixed effects were identified.
- 5.6.12. Vehicular Transport and 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 mixed or 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. The assessment found a number of positive impacts on the built environment, movement, environmental protection and climate mitigation, particularly in relation to policies on vehicle parking, aviation and the impact of development on transport. None of the effects identified were judged to be significant, including for assessments where mixed effects were identified.
- 5.6.13. Active Travel 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 or 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 relation to the economic growth objective by using space that could be let as commercial office space. However, the provision of facilities for active travel has many positive impacts on the built environment, environmental protection, climate change mitigation, health and equalities,

particularly following the Covid-19 pandemic and social distancing measures. None of the effects identified were judged to be significant, including for the assessments where mixed effects were identified.

- 5.6.14. 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. Significant positive effects are therefore identified in relation to the heritage assets IIA objective. More generally, the impacts are assessed as mainly positive. Together with minor positive effects associated with economic growth, minor negative impacts are also identified since protection could restrict business development. However, the City’s historic landmarks are seen as a unique selling point for the City, with the positive impacts outweighing the negatives.
- 5.6.15. Tall Buildings and Protected Views – these policies protect the views of historic landmarks by restricting the areas that are appropriate for tall buildings. Significant positive effects were therefore identified in relation to the safe environment and crime reduction IIA objective, in addition to the heritage assets IIA objective. More generally, the policies will have many positive impacts particularly at a regional scale but could restrict economic growth if sufficient office floorspace cannot be developed in the appropriate areas.
- 5.6.16. 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 and biodiversity and urban greening IIA objectives. Mixed minor positive and minor negative effects are identified in relation to heritage assets since certain types of greening could impinge on protected viewing corridors and vistas but protection of green spaces could improve the setting of historic buildings. Mixed effects are also identified in relation to creating a safe environment because open space and GI enhances the public realm whilst generating passive surveillance, but open spaces might increase opportunities for anti-social behaviour. Historic parks and gardens are not mentioned in this part of the Plan but are protected through Historic Environment policies.
- 5.6.17. Climate Resilience and Flood Risk – policies deal with the range of actions needed to ensure that the City remains safe and comfortable in a changing climate. This covers overheating, urban heat island effect, flood risk, sustainable drainage and flood defences. Impacts were found to be mainly positive but with some minor positive and minor negative impacts in relation to the built environment and public realm and heritage assets IIA objectives due to the protection these policies afford from climate impacts such as flooding compared with the potential detriment to the setting of heritage assets of poorly designed flood defences. None of the effects identified were judged to be significant.

5.6.18. Circular Economy and 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 mixed against several economic and environmental objectives since there would be short term costs but long term benefits as we move towards a green economy and potential environmental impacts depending on design and management of waste facilities. But in the main these policies were seen as essential and beneficial, with significant positive effects identified in relation to the built environment and public realm IIA objective, in addition to the waste management IIA objective.

5.6.19. 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 mainly positive effects, including significant positive effects in relation to the following IIA objectives, in line with other policies in the Plan:

- Thames Policy Area, Blackfriars and Pool of London – these policies were assessed to have significant positive impacts on the built environment and public realm IIA objective. With the exception of Pool of London, they were also assessed as having significant positive impacts on the environmental protection IIA objective.
- Aldgate, Tower and Portsoken – this policy was assessed as having significant positive impacts against the economic growth and built environment IIA objectives, but some uncertainty or mixed effects were identified in relation to environmental objectives. Minor negative effects were identified in relation to the waste management IIA objective as development and visitor numbers will generate increased levels of construction and operational waste.
- City Cluster – this policy will significantly benefit economic development with some uncertainty or mixed effects identified in relation to environmental objectives due to the scale of commercial development envisaged. Minor negative effects were identified in relation to the waste management IIA objective as the significant level of development activity will generate increased construction and operational waste.
- Fleet Street and Ludgate – this policy was assessed as having a significant positive impact on the built environment and public realm IIA objective, while the extension to include Ludgate Hill has significant positive impacts on the heritage assets objective through protection of views of St Paul’s Cathedral and enhancements to the character and appearance of the

ancient processional route. Uncertain or mixed effects were identified in relation to the transport and movement and housing IIA objectives.

- Smithfield and Barbican; Culture Mile; and Smithfield – these policies will have significant positive impacts on the built environment, heritage assets and social and cultural facilities IIA objectives, with Culture Mile Implementation policy also significantly positive for economic growth due to the visitor economy and support for digital and creative industries.
- Liverpool Street – this policy will have significant positive impacts on economic growth and transport and movement. Minor negative effects were identified in relation to the waste management IIA objective as increased development will generate increased levels of construction and operational waste. Other effects identified were minor, mixed or uncertain.

5.6.20. Planning Contributions and Viability Assessments – The inclusion of this technical policy is assessed as mainly positive in providing guidance on what will be expected on these topics. These positive effects were judged to be significant in relation to the transport and movement, housing, education, and equality and inclusion IIA objectives. Negligible effects were identified for the Viability Assessments policy because it outlines how viability assessments must be undertaken in accordance with the NPPF, which already forms the baseline against which the policies are appraised. The guidance on viability assessments is not expected to result in any notable effects against the IIA objectives.

## 5.7 Assessment of significant changes made between the Draft Plan and Proposed Submission stages of the Local Plan

5.7.1. The significant changes made to the Local Plan between draft and Proposed Submission versions of the Plan are summarised below in Plan order, together with a summary of how this has affected the IIA assessment of relevant policies:

### Policy HL2 (Air Quality)

- Further strengthening of the policy to reflect the City Corporation's new Air Quality Strategy and changes to the London Plan. The draft policy had already been assessed as positive against a large number of IIA objectives, so the changes made little difference to the overall scoring. The impact on economic growth was revised from uncertain to minor positive on the basis that the new Air Quality Strategy provides more clarity and the benefits in attracting businesses and skilled workers on balance outweigh the additional costs for developers.

### Policy HL9 (Health Impact Assessment)

- A new policy to embed the consideration of health impacts within the planning process. As this is a new policy, there is no comparative draft Plan assessment. The new policy was assessed as significantly positive for health

and positive against other IIA objectives, with a mixed minor positive and minor negative impact on economic growth.

#### Strategic Policy S3 (Housing)

- A commitment to deliver 50% affordable housing on public sector land in accordance with the London Plan policy approach. This change resulted in the scoring of the equality and inclusion IIA objective being upgraded from a minor positive to a significant positive because of the potential additional delivery of affordable housing.

#### Policy OF2 (Protection of Existing Office Floorspace)

- A more flexible approach to the loss of office floorspace to residential use in or near residential areas, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be complementary to the business City. This change resulted in the impact on housing being assessed as mixed minor positive and minor negative, whereas the draft Plan policy had been assessed as detrimental to housing.

#### Policy RE5 (Markets)

- Additional wording has been added to this policy, stating that proposals for markets and temporary pop-ups will be permitted where they would not involve the permanent loss of open space or harm the character of that space. This change resulted in the impact on open space being assessed as minor positive instead of uncertain.

#### Strategic Policy S6 (Culture, Visitors and the Night-Time Economy)

- The addition of a requirement for major development to include Cultural Plans to help enrich and enhance the City's cultural offer. This new policy requirement has led to the assessment of the social and cultural impacts of the policy being upgraded from minor positive to significant positive. Scoring against other IIA objectives remained largely unchanged.

#### Various policies including design and tall buildings

- Greater emphasis on the use of 3D modelling technology to assist in the determination of planning applications. This is a technical detail on how applications will be assessed rather than a policy change so IIA assessment is not necessary.

#### Policy HE1 (Managing Change to Heritage Assets)

- Differentiation between the policy approach to designated and non-designated heritage assets. Although significant in terms of policy and consistency with the NPPF, this change did not alter the IIA scoring from the draft Plan stage as it is only one element of a multi-criteria policy and non-designated heritage assets will still be afforded policy protection.

#### Strategic Policies S12 (Tall Buildings) and S13 (Protected Views)

- Refinements to the policies on tall buildings and protected views, including recognition that the background to the Tower of London on the eastern fringe of the City is an area inappropriate for tall buildings. The impact of the tall buildings policy on economic growth has been revised from minor negative to



mixed minor negative and minor positive, reflecting changes to the policy wording which are more supportive of tall buildings on suitable sites notwithstanding the identification of the eastern fringe of the City as an area inappropriate for tall buildings. The assessment of the impact of the Protected Views policy on heritage assets has been upgraded from minor positive to significant positive, in part due to the additional protection given to the protected silhouette of the Tower of London and in part because the significance may have been underestimated in the original assessment.

#### Policy OS4 (Trees)

- A new policy on trees, which was an omission from the draft Plan. As this is a new policy, there is no comparative draft Plan assessment. The new policy was assessed as significantly positive for biodiversity and urban greening and minor positive against a wide range of other IIA objectives.

#### Strategic Policy S22 (Fleet Street and Ludgate)

- Extend the Fleet Street Key Area of Change to include Ludgate Hill and to rename it the Fleet Street and Ludgate Key Area of Change. This change has resulted in the built environment and heritage assets objectives being assessed as significant positive (compared to minor positive and mixed respectively) reflecting the emphasis given to protecting and enhancing the view of St Paul's and the character and appearance of this historic processional route between Westminster and the City of London. The extended area would include more residential properties and an uncertainty has been identified regarding the impact of the proposed extension of retail activity into the evenings and weekends on residential amenity (housing objective).

## Covid-19

5.7.2. In response to the Covid-19 pandemic, a number of updates were made to the text throughout the City Plan 2036, in addition to Policies HS4 (Housing Quality Standards) and RE5 (Markets). Policy HS4 now requires the provision of amenity space for individual units and where possible, outdoor space. Policy RE5 now places an increased emphasis on pop-up and meanwhile uses to minimise vacancies of retail premises whilst a long-term occupier is sought. These changes were considered minor and did not result in any changes to the IIA findings.

5.7.3. The effects of Covid-19 in the longer term are uncertain and much depends on the evolution of the virus and society's ability to develop and rollout vaccines or treatments. As stated in the City Plan 2036, the Plan is looking beyond the current pandemic to a period when a vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation. Therefore, although there has been a shift to remote working, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly with a blended approach of in-office and remote working.

## Use Classes Order

- 5.7.4. The changes to the Use Classes Order introduced in September 2020 also resulted in a number of updates to the text in the City Plan 2036, in addition to Policies S1 (Healthy and Inclusive City), S4 (Offices), OF3 (Temporary 'Meanwhile' Uses), S5 (Retailing), RE1 (Principal Shopping Centres), RE2 (Retail Links) and S22 (Fleet Street and Ludgate). These changes were mainly focused on the new Class E commercial, business and service use, whereby Class E uses can be converted to other Class E uses without planning permission. Policy OF3 (Temporary 'Meanwhile' Uses) now references the new Class E use, whilst Policies S1 (Healthy and Inclusive City) and S4 (Offices) state that conditions will be attached to permissions to ensure their future retention where necessary. Reference to A1 uses has been replaced by 'comparison and convenience' uses in Policies S5 (Retailing), RE1 (Principal Shopping Centres), RE2 (Retail Links) and S22 (Fleet Street & Ludgate) because Class A1 was revoked when the new Use Classes Order came in.
- 5.7.5. With the exception of Strategic Policy S4 (Offices), the changes outlined above did not result in any changes to the IIA findings. In addition to the new Class E use, Strategic Policy S4 now includes reference to the transformation of space to support new uses. Ensuring that new floorspace is designed to enable transformation of space, will reduce the need for redevelopment and associated construction waste. Therefore, the negative effect recorded against the waste management IIA objective was changed to a mixed minor positive and minor negative effect.

## Visit from Planning Inspector (PINS)

- 5.7.6. The City of London had a virtual advisory visit from a Planning Inspector in 2020 and updated the City Plan 2036 in response to advice received. Minor amendments were made to the wording throughout the Plan, in addition to Policies HL2 (Air Quality), S2 (Safe and Secure City), S3 (Housing), HS8 (Older Persons Housing), S20 (Aldgate, Tower and Portsoken), S23 (Smithfield and Barbican). The changes were generally considered minor and with the exception of Strategic Policy S23 (Smithfield and Barbican), did not result in any changes to the IIA findings.
- 5.7.7. Strategic Policy S23 (Smithfield and Barbican) now refers to residential development so that it is consistent with the distribution of development set out in the Spatial Strategy. Therefore, the uncertain effect against the housing IIA objective was changed to a mixed minor positive and minor negative effect.
- 5.7.8. The detailed assessments for each of the Plan policies can be found in Appendix 5 (Draft City Plan 2036) and Appendix 6 (Proposed Submission City Plan 2036).

## 5.8 Health Impact Assessment findings

5.8.1. 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 and 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 and the promotion of city greening 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 seek to protect residential amenity with benefits for residents’ health

5.8.2. The Health Impact Assessment screening identified some uncertainties associated with the 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.

5.8.3. While no negative impacts were identified through the IIA health objective, a full Health Impact Assessment scoping exercise has been undertaken for completeness and is attached as Annex 1 to the IIA.

5.8.4. As mentioned previously, the City Plan 2036 is looking beyond the current pandemic to a period when a vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation. As such the Plan policies are not intended to address public health during pandemic conditions. However, there is one instance whereby the City Plan 2036 has been adjusted to respond to Covid-19. Policy HS4 (Housing Quality Standards) now requires the provision of amenity space for individual units and where possible, outdoor space. The Health Impact Assessment screening focuses on the strategic policies and already recognises positive effects in relation to Key Theme 3: Healthy Environment as a result of strategic policies that provide or improve access to open space.

## 5.9 Equalities Impact Assessment findings

5.9.1. 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.

5.9.2 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.

5.9.3. While no negative impacts were identified through the IIA equalities and inclusion objective, a full Equalities Assessment scoping exercise has been undertaken for completeness and is attached as Annex 2 to the IIA.

## 5.10 Cumulative Effects of Proposed Submission Draft City Plan 2036 and other plans on IIA Objectives

5.10.1. IIA of the Proposed Submission 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.

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

- 5.10.3. **Economic growth** – The 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.
- 5.10.4. The cumulative impact of implementation of the City Plan 2036 alongside other plans for London’s economy such as the Mayor’s 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 a leading international financial and business centre. The major uncertainty for the economy is the impact of Covid-19 and the UK’s departure from the European Union. The impacts of plans for the UK economy and the trade deal agreed with the EU in December 2020 will be considered as they emerge, and any significant policy changes will be assessed against the IIA objectives.
- 5.10.5. **Built environment and public realm** – The IIA assessments showed that the proposed policies in the City Plan 2036 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.
- 5.10.6. The City Plan 2036 is aligned with the City’s 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.
- 5.10.7. **Safe environment and crime reduction** – Some City Plan 2036 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. The policy on tall buildings applies the

Civil Aviation Authority's maximum height limit for the safety of international flights.

- 5.10.8. 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.
- 5.10.9. **Heritage assets** – Policies in the City Plan 2036 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.
- 5.10.10. National and London-wide heritage protection overseen by Historic England 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.
- 5.10.11. **Waste management** – Offices, retail and markets policies in the City Plan 2036 have the potential for negative impacts on waste as do policies on hotels and the night-time economy. However, the process of redevelopment in the City where buildings are often demolished to make way for new ones creates the biggest impact on the IIA aspirations for waste. The transformation and adaptation of space, circular economy principles and resource conservation will be essential during the period of the Plan to address this.
- 5.10.12. The London Borough of Bexley's Local Plan provides capacity to manage the City's waste apportionment, within the framework of a wider partnership group involving 5 London boroughs and the City. Waste Planning Authorities inside and 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.
- 5.10.13. **Environmental protection** – Many of the policies in the City Plan 2036 have positive impacts on environmental protection, contributing to carbon emission reduction, air and water quality improvements and noise and light pollution abatement. However, some policies including retail, night-time economy, river transport and short-term residential lets were seen as having potential negative impacts.

- 5.10.14. 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.
- 5.10.15. **Climate mitigation and resilience** – Office and retail policies within the City Plan 2036 were seen as having potential for negative impacts on climate mitigation due to the heating and cooling requirements. The introduction of consolidation centres was assessed as having mixed positive and negative impacts since emissions may reduce in the City but increase elsewhere, and the lack of current controls on emissions from river transport results in uncertainty for this approach, although it takes vehicles off the roads.
- 5.10.16. 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.
- 5.10.17. **Open spaces, biodiversity and urban greening** – The impact of City Plan 2036 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.
- 5.10.18. 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.
- 5.10.19. **Transport and movement** – The radical changes in transport and healthy streets policies within the City Plan 2036 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 freight and 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 facilities for active transport provides a positive impact.
- 5.10.20. 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 Transport Strategy provide the framework for the City's IIA objective of improving the safety, sustainability, efficiency and attractiveness of transport and minimising the negative environmental and health impacts of travel in, to, from and through the City.

- 5.10.21. **Housing** – The City's role as a business district means that the City Plan 2036 policies do not focus on housing to the same extent as other authorities' plans might. However, the City's small size and proximity to other areas enables housing to be provided elsewhere (as well as within the City) in line with London Plan targets and the City contributes to this through S106 contributions for affordable housing.
- 5.10.22. The City relies heavily on other areas of London and beyond to provide housing for its 520,000 workers. The City's contribution in providing jobs outweighs the need to provide significantly 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.
- 5.10.23. **Social and cultural facilities** – Assessment shows mainly positive impacts from the City Plan 2036 on social and cultural facilities with provision of shared services and facilities benefiting neighbouring areas as well as the City.
- 5.10.24. The City's aspiration to develop a world-class cultural destination centred around the Barbican Centre and Smithfield 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.
- 5.10.25. **Health** – The City Plan 2036 as a whole takes a positive pro-active approach to health which is reflected in the assessment. This is reinforced by the findings of the Health Impact Assessment scoping exercise at Annex 1.
- 5.10.26. 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.
- 5.10.27. **Education** – The assessment of the City Plan 2036 has not identified any negative impacts on education.



- 5.10.28. 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.
- 5.10.29. **Equality and inclusion** – No negative impacts from the City Plan 2036 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 Portsoken and Smithfield & Barbican (Culture Mile) 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.
- 5.10.30. 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.

## 6. Impact of the 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. Appendix 7 outlines the progression of each policy through its "Policy Story" including policy changes that were made as a result of the IIA.
- 6.1.3. Policy officers have developed their expertise in sustainability appraisal over the last decade. This has improved policy drafting skills so that unacceptable impacts are recognised at an early policy drafting stage and are less likely to be included in the Plan.
- 6.1.4. Specific changes which can be attributed to the IIA process to date include:
- 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 the high office growth scenario, development of local waste management facilities and allowing development on some open space were rejected in the evolution of policy.
  - The decision to widen the Fleet Street KAOC policy to include Ludgate Hill was influenced by the IIA assessment findings which suggested that the original policy would have uncertain impacts on heritage assets including views of St Paul's Cathedral.

- Policy HE2 was amended to refer to inclusive access to historic sites as a result of uncertainty identified against the equality and inclusion objective.
- 6.1.5. Where uncertainties were identified through the IIA, mitigation measures have been identified and incorporated into the Proposed Submission version where feasible.

## 7. Mitigation

- 7.1.1. Where negative uncertain or mixed effects were identified through the IIA of the draft City Plan 3026, mitigation measures were proposed. The assessment tables in Appendix 6 set out in detail the mitigation measures identified for each set of policies and whether these were taken forward in the Proposed Submission Draft Plan.
- 7.1.2. 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 or in the London Plan. Mitigation measures have been incorporated into policies alongside any changes made in response to consultation comments.
- 7.1.3. A few negative effects were identified but none of these were significantly negative. The negative impacts of office development originally related primarily to waste management and housing, but policy changes have led to these being reassessed as mixed minor negative and positive. Policy OF2 now allows office floorspace in or near identified residential areas to be lost where this would create additional housing, while Strategic Policy S4 now includes reference to the transformation of space to support new uses. Ensuring that new floorspace is designed to enable transformation of space will reduce the need for redevelopment and associated construction waste. Minor negative impacts on waste remain for the Key Areas of Change policies that promote significant office development. 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.
- 7.1.4. The restrictions on tall buildings which protect views of historic landmarks were identified as having minor negative impacts on economic growth. While minor negative effects are likely to be unavoidable, significant negative effects will be avoided by exploiting development potential where it is available in parts of the City where views protection does not apply. The City Plan 2036 identifies renewal opportunity sites in the City Cluster, where tall buildings will be appropriate subject to certain criteria.

## 8. Monitoring framework (proposed)

- 8.1.1. Table 11 shows the proposed framework of indicators which aims to monitor the significant sustainability effects of implementing the City Plan 2036. This

monitoring will also ensure that where uncertainties exist any unintended adverse effects are picked up quickly, allowing any appropriate remedial action to be implemented. The monitoring framework will be finalised on adoption of the City Plan 2036

**Table 9: Proposed IIA monitoring framework**

| Parameter                          | Effect of City Plan 2036 (significant effects are marked in <b>bold text</b> )  | IIA objectives   | Monitoring indicators   | Source of info  |
|------------------------------------|---|--|---|---|
| Biodiversity<br>Fauna and<br>Flora | The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna. <b>Significant positive impacts on local biodiversity should result from implementation of the open spaces and green infrastructure policies.</b>   | 8 Improved open spaces<br><br>9 Improved biodiversity & urban greening   | Hectares of open space, green roofs and walls<br><br>Number of bird species<br><br>Numbers of marine mammals, fish, invertebrates and marine algae in the Thames at Blackfriars   | Local Plan monitoring reports<br><br>Rooftop birds survey<br><br>Thames Tideway tunnel monitoring   |
| 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. <b>Significant positive impacts on health and environmental protection will result from the healthy and inclusive City policies.</b> | 3 Safe environment and crime reduction<br><br>11 Housing<br><br>13 Improved health<br><br>14 Improved education<br><br>15 Equality & inclusion | Crimes committed.<br><br>Data on trends in population, age structure, ethnicity, household structure, residential units permissions and completions, affordable housing, special needs housing<br><br>Data on health facilities permissions and completions<br><br>Data on perception of health<br><br>Pollution data<br><br>Data on educational facilities permissions and completions<br><br>Data on workforce population<br><br>Data on educational qualifications | City of London crime statistics<br><br>Local Plan monitoring reports and development schedules<br><br>Public Health Survey<br><br>Air quality monitoring by Environmental Health<br><br>Census<br><br>Education statistics<br><br>Equalities reports<br><br>Census<br><br>Indices of Deprivation<br><br>City of London employment trends monitoring<br><br>ONS Business Register and Employment Survey (BRES) |

|                     |  |   |  |   |
|---------------------|--|---|--|---|
|                     |  |   | Data on age and gender of workforce<br><br>Data on deprivation<br><br>Number of persons per socio-economic grouping of workforce   |   |
| 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. <b>Policies for the Thames riverside, air quality, and contaminated land and water quality will have significant positive impacts on soil, water and air.</b>                           | 6 Improved environmental protection   | Air quality – including in areas where consolidation centres serving the City are located<br><br>River Thames water quality<br><br>Contaminated land in the City                               | Air Quality Strategy annual monitoring report<br><br>London-wide air quality data from the GLA<br><br>Environment Agency monitoring<br><br>City of London environmental protection monitoring |
| 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. <b>No significant climate impacts were identified from the implementation of the Plan due to the small geographic area covered</b> | 7 Climate change mitigation and resilience<br><br>10 Transport and movement | BEIS sub national annual carbon emission statistics for the City of London<br><br>Average Urban Greening Factor associated with major developments<br><br>SuDS in development and public realm | BEIS national statistics<br><br>Urban Greening factor monitoring<br><br>SuDS monitoring   |
| Material assets     | The quality of the City's buildings and spaces is secured through a range of City  | 1 Economic growth   | Office and commercial floorspace permissions and completions   | Local Plan monitoring reports and development schedules   |

|                                 |  |   |   |  |
|---------------------------------|--|---|---|--|
|                                 | Plan 2036 policies including safe and secure City, culture, visitors and the night-time economy and open spaces and green infrastructure. <b>The City's Key Areas of Change policies reinforce this generating significant local positive impacts.</b>   | 2 Attractive built environment and public realm   | Number of VAT registered businesses<br>Spatial distribution of employment<br>Scores of Global Financial Centres<br>Hotel bedrooms<br>Wi-Fi coverage<br>Public realm enhancement schemes   | ONS - Business Register and Employment Survey (BRES)<br>Global Financial Centres Index<br>COL infrastructure monitoring<br>Public realm enhancement strategies   |
| 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 identified viewing points. <b>Significant positive impacts on cultural heritage will result from Culture Mile, Smithfield and Barbican area policies</b> | 2 Attractive built environment and public realm<br>4 Heritage Assets<br>12 Social and cultural facilities | Number and type of designated heritage assets<br>Number and type of designated heritage assets that are identified as being at risk<br>Data on social and cultural facilities permissions and completions.<br>Development in conservation areas | The Land Use of Listed Buildings in the City of London report<br>City of London Churchyards Statement of Significance report<br>Historic England's Heritage at Risk Register<br>Local Plan monitoring report and development schedules |
| Waste                           | Implementation of the Waste and Circular Economy policies will result in minimisation of waste arisings from the City. <b>This will have significant positive environmental impacts on the movement and disposal of waste.</b>   | 5 Improved waste management   | Dataset of locations that waste is sent to, including type of waste and tonnage.<br>Management of the City of London's waste apportionment  | Waste Interrogator - data.gov.uk<br>South-East London Joint Waste Planning Group membership. Technical report produced by South-East London Joint Waste Planning Group.  |

## 9. Next steps

9.1.1. This IIA report will be issued for public consultation alongside the Proposed Submission Draft of the City Plan 2036 in March 2021 and will accompany the City Plan 2036 at submission. Any significant changes suggested at Examination will be assessed for their impacts and any necessary mitigation proposed prior to adoption of the City Plan 2036. The draft monitoring framework will be finalised on adoption and confirmed in the Adoption Statement.

## Appendices

Appendix 1 Other Plans & Programmes

Appendix 2 Baseline Information

Appendix 3 IIA Consultation Responses

Appendix 4 IIA Commentary I&O Consultation

Appendix 5 IIA Assessments (Draft City Plan 2036)

Appendix 6 IIA Assessments (Proposed Submission Draft City Plan 2036)

Appendix 7 Policy Stories

Appendix 8 Quality Assurance Audit

Annex 1 – Equalities and Health Impact Scoping Assessment