City of London

Integrated Impact Assessment

Scoping Report

Local Plan Review

Consultation Draft

January 2016

CITY
OF
LONDON

Consultation

The City of London Corporation (City Corporation) is consulting on a draft Integrated Impact Assessment Scoping Report between 11th January 2016 and 22nd February 2016

Consultation on this draft will be undertaken in accordance with the procedures set out in The Town and Country Planning (Local Planning) (England) Regulations 2012, The Environmental Assessment of Plans and Programmes Regulations 2004 and the requirements of the City Corporation's Statement of Community Involvement 2012.

Copies of the documents are available:

Online at: City of London Website

From the Department of the Built Environment in the Guildhall London EC2V 7HH

Please send any comments by 22nd February 2016 to:

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All comments will be made public.

If you would like to receive a copy of this publication in an alternative format such as Braille, large print, or audio tape, or would like to receive it in an alternative language, please contact the Development Plans Team on telephone number 020 7332 1710, minicom number 020 7332 3929 or email localplan@cityoflondon.gov.uk

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1. Introduction

1.1. This Scoping Report represents the first stage in the Integrated Impact Assessment (IIA) of the review of the City of London Local Plan. The Local Plan review will set out the City Corporation's vision, strategy, objectives and policies for planning in the City of London to 2036. It will provide a spatial framework which brings together and co-ordinates a range of plans and strategies prepared by the City Corporation, its partners and other agencies. It will take account of projected changes in the economy, employment, technology, population and transport demand seeking to maintain a high quality urban environment whilst protecting historic assets.

2. Purpose of Integrated Impact Assessment

2.1. Integrated Impact Assessment brings together Sustainability Appraisal (SA), Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulation Assessment Screening (HRA) into a single framework. This comprehensive assessment will be carried out as an iterative process considering the impacts of emerging policy and proposing policy alterations or mitigation for any adverse impacts that are identified.

2.2. Sustainability appraisal is the process by which the Local Plan is tested to ensure that it will promote sustainable development in line with the National Planning Policy Framework (NPPF). The sustainability appraisal must meet the requirements of the European Directive on strategic environmental assessment (Directive 2001/42/EC). The process takes account of social, environmental and economic aspects of sustainability.

2.3. Equality Impact Assessment evaluates how the Local Plan will contribute to the elimination of discrimination, promotion of equality of opportunity and fostering good relations between those who have protected characteristics and those who don't. This will be carried out in line with the Equality Act 2010 Public Sector Equality Duty and will assist in demonstrating compliance with the NPPF requirement to promote community cohesion.

2.4. Health Impact Assessment will assess the impacts of implementation of Local Plan policies on the health of the City's communities and identify any adverse local or regional health impacts. Although HIA is not a statutory requirement, this process will assist in demonstrating compliance with NPPF section 8 "Promoting Healthy Communities".

2.5. Habitats Regulation Assessment Screening must be carried out in line with the Habitats Directive (92/43/EEC) to assess whether the Local Plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects.

2.6. These assessments will be integrated into a single process following the sustainability appraisal methodology.

3. Integrated Impact Assessment Process

3.1. The Integrated Impact Assessment process is an iterative process which informs the development of plan policies considering reasonable alternatives and evaluating them to establish the most sustainable option for final policy. The methodology to be used is based on the sustainability appraisal process. For equality impacts, health impacts and habitats regulation assessment this will form a screening stage and any adverse impacts identified will be assessed separately through the relevant detailed assessment.

3.2. The initial scoping stage sets the context and baseline, identifies other relevant plans and programmes, defines the IIA objectives and defines the framework for the assessments.
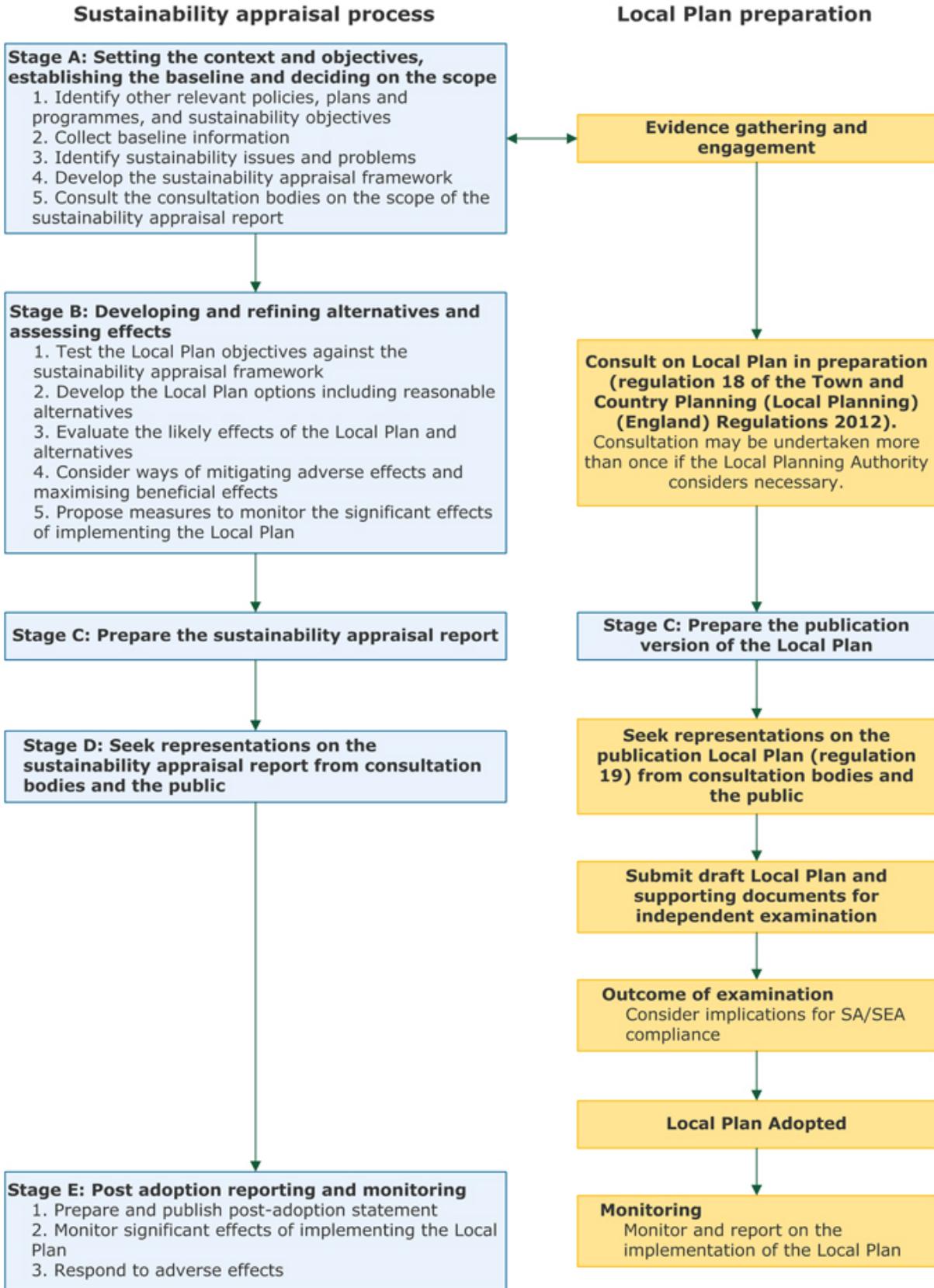
Sustainability appraisal process

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

Stage B: Developing and refining alternatives and assessing effects
1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

Stage C: Prepare the sustainability appraisal report

Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public

Stage E: Post adoption reporting and monitoring
1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

Local Plan preparation

Evidence gathering and engagement

Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

Stage C: Prepare the publication version of the Local Plan

Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public

Submit draft Local Plan and supporting documents for independent examination

Outcome of examination Consider implications for SA/SEA compliance

Local Plan Adopted

Monitoring Monitor and report on the implementation of the Local Plan

Fig 1: IIA will follow the Sustainability Appraisal Methodology

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4. Stage A1 Other Plans and programmes

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

4.2. Local Plans and Programmes

- City of London Local Plan 2015

- City of London Statement of Community Involvement 2012 (under review)

- City of London Open Spaces Strategy 2015

- City of London Biodiversity Action Plan 2010-2015

- City of London Tree Strategy 2012

- City of London Waste Strategy 2013-2020

- City of London Air Quality Strategy 2011-2015

- City of London Noise Strategy 2012-16

- City of London Contaminated Land Strategy 2001

- City of London Strategic Flood Risk Assessment 2012

- City of London Local Flood Risk Management Strategy 2014- 2020

- City of London Housing Strategy 2014

- City of London Joint Health and Wellbeing Strategy 2012-16

- City and Hackney Joint Strategic Needs Assessment City Supplement 2014

- City of London Rail Strategy 2009

- City of London Cycle Parking Strategy 2011

- City of London Road Danger Reduction Plan 2013

- City of London Local Implementation Plan 2012

- City of London Thames Strategy 2015

- City of London Cultural Strategy 2012-17

- City of London Visitor Strategy 2013-17

- City of London Policing Plan 2015-2018

- City of London Statement of licensing policy 2013

- City of London Community Infrastructure Levy 2014

- City of London Planning Obligations SPD 2014

- City of London Office Use SPD 2015

- City of London Protected Views SPD 2012

- Standard Highways and servicing requirements for developments in the City of London Planning Advice note 2007

- Conservation Area Strategy SPDs (various dates)

- Environmental Enhancement Strategies (various dates)

4.3. Regional Plans and Programmes

- The London Plan 2015 consolidated with alterations since 2011

- The Mayor's Transport Strategy 2010

- The Mayor's Vision for Cycling and Mayor's Cycling Strategy 2015

- Mayor of London River Action Plan 2013

- Mayor's Air Quality Strategy 2010

- Mayor's Water Strategy 2011

- Mayor's Municipal Waste Management Strategy 2011

- Mayor's Business Waste Management Strategy 2011

- Mayor's Climate Change Mitigation and Energy Strategy 2011

- Mayor's Climate Change Adaptation Strategy 2011

- The London Health Inequalities Strategy 2010

- The Mayor's Cultural Strategy 2014

- Mayor's Economic Development Strategy 2010

- Smart London Plan 2013

- Mayor's Digital Inclusion Strategy 2015

- London Infrastructure Plan 2050 (draft)

- London Housing Strategy 2014

- Mayor's Police and Crime Plan 2013-2016

- Thames Estuary 2100 Plan

- Cultural Tourism Vision for London 2015-2017

- London Office Policy Review 2012 (Ramidus consulting for the GLA)

- GLA Working Paper: Borough Employment Projections

- London View Management Framework SPG 2012

- London's World Heritage Sites - Guidance on settings SPG 2012

- Tower of London World Heritage Site Management Plan 2007

- Tower of London Local Setting Study 2010

- Mayor of London Community Infrastructure Levy Charging Schedule 2012

- Mayor of London Use of Planning Obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy SPG 2013

- Westminster City Plan Strategic Policies 2013

- Camden Core Strategy and Development Management Policies 2010

- Islington Core Strategy and Development Management Policies 2011

- Hackney Core Strategy and Development Management Policies 2010

- Tower Hamlets Core Strategy and Managing Development 2010

- Southwark Core Strategy 2011 and Southwark Plan saved policies 2007

- Lambeth Local Plan 2015

- London and regional Waste Plans (various dates)

4.4. National Plans and Programmes

- National Planning Policy Framework (NPPF)2012

- National Planning Practice Guidance (NPPG)Living draft

- Infrastructure Act 2015

- Growth and Infrastructure Act 2013

- Localism Act 2011

- Planning Act 2008

- Planning and Compulsory Purchase Act 2004

- Planning (Listed Buildings and conservation Areas) Act 1990

- Biodiversity 2020: A strategy for England's wildlife and ecosystem services

- Waste Management Plan for England 2013

- National Planning Policy for Waste 2014

- The Air Quality Strategy for England Scotland Wales and Northern Ireland 2007

- The Carbon Plan - delivering our low carbon future 2011

- The National Adaptation Programme 2013

- Historic England Advice Note 4 Tall Buildings 2015

4.5. International Plans and Programmes

- 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 renewed 2009

- Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020

- Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives: (1999, 2000 & 2002) - New Air Quality Directive 2008/50/EC

- EU Water Framework Directive (2000/60/EC)and amendments

- Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration

- Directive on the Assessment and Management of Flood Risks 2007/60/EC

- The Waste Framework Directive (2008) Directive 2008/98/EC on waste

- The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste

- EU Environmental Noise Directive (2002) Directive 2002/49/EC relating to the assessment and management of environmental noise

- EU Biodiversity Strategy to 2020

- EU Habitats Directive 92/43/EEC

- 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 for 2010: A Time to Decide (European Commission, 2001)

- 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)

- Directive on Integrated Pollution Prevention and Control (96/61/EC)

5. Stage A2 Baseline information

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

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

5.3. The SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004 lists a number of elements that should be considered including biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationships between these factors. This list incorporates health, equalities and habitats aspects therefore it is appropriate to use these topic headings to define the Integrated Impact Assessment baseline.

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

6. Stage A3 Sustainability Issues and problems

6.1. The baseline information, analysis of trends against the SA objectives from the previous sustainability appraisal in 2006 and other evidence have been used to inform the identification of sustainability issues and problems which could be addressed through the Local Plan.

7. Economic Issues

7.1. Employment

7.1.1. The City is a compact central London district covering just over one square mile, which provides employment for over 400,000 people and contributes 3.1% of the UK's GDP. It is important that the employment space in the City keeps pace with the needs of businesses particularly in the face of changing work patterns. In order to achieve economic growth and provide additional employment opportunities for a rising population in London and the South East, suitable flexible employment space will be needed to facilitate new and expanding businesses. To accomplish this, the City's working population is predicted to increase by up to 100,000

over the period 2009- 2036[1]. This must be achieved without compromising the City's environment and heritage assets. In addition to offices, which are the predominant land use, complementary uses such as retail, hotels, health and leisure facilities must cater for the needs of workers as well as the 9,000 residents, 27,000 students and 8.8 million visitors per year.

7.2. Transport and Movement

7.2.1. The majority of City workers commute using public transport from the rest of London and beyond, using the City's streets to complete their journeys as pedestrians or cyclists. Increasing numbers are cycling, putting pressure on the City's cycling infrastructure. A major component of the traffic in the City consists of buses, taxis and delivery and servicing vehicles. Ensuring that the transport network can support the predicted growth in the City's working and resident populations is challenging. Provision of additional public transport such as Crossrail and upgrades of the underground, overground and Thameslink networks will accommodate additional passengers but will put further pressure on the City's pedestrian environment. Provision of capacity for active transport modes such as cycling and adequate highway space for essential vehicles will present potential conflicts. A particular issue is the servicing of new tall buildings in the highly constrained street environment of the eastern cluster. This must be achieved whilst improving air quality, minimising energy consumption and improving the health of the City's communities.

7.3. Utilities Infrastructure

7.3.1. Provision of capacity in the utility infrastructure network in terms of electricity, gas, water supply, sewerage, decentralised energy networks and telecommunications is essential for the functioning of the City. Increased development and changes in working practices will impact on the type and quantum of utility infrastructure required. Demand management must make a major contribution to reducing the environmental impact of energy and water use and minimising pressure on the sewerage network.

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[1] GLA Borough employment projections 2013

7.3.2. The timely implementation of utility upgrades, new infrastructure such as heating and cooling networks, and SuDS and drainage infrastructure, requires co-ordination at a scale that is wider than individual development sites. This must be achieved without any negative impacts on the environment, and where possible incorporating environmental improvements such as reduced flood risk and improved air quality.

7.4. Digital connectivity

7.4.1. During the period of the Local Plan to 2036 there will be a further increase on employment floorspace and changes in the way people work and live. This will include more flexible and agile working with a likelihood of increased reliance on digital technology from all quarters. The challenge is to provide suitable digital connectivity for the changing needs and work patterns of workers, residents and visitors without increasing energy consumption or carbon emissions. In addition this must be achieved without compromising the City's historic environment, public realm or security.

7.5. Security

7.5.1. The high profile nature of City premises, businesses and events means that terrorism and security are constant threats. It is important that the City remains an open and welcoming place and that necessary security infrastructure, principally in buildings but also in the public realm is kept as unobtrusive as possible.

8. Environmental Issues

8.1. Open spaces & biodiversity

8.1.1. Although the City is densely developed, open spaces form an important function for relaxation and recreation. They also provide pockets of space for wildlife, forming corridors for the movement of species, improving air quality and providing urban cooling benefits. The River Thames, which is a Site of Metropolitan Importance for Nature Conservation, brings wider benefits for migrating birds and fish species. There is intense pressure on all the City's open spaces particularly at lunchtimes, but flexible working patterns could result in this being spread more evenly throughout the day. New development provides an opportunity to create additional open space, which should be designed for multiple uses and resilient to future climate conditions.

8.2. Air Quality

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

8.3. Soil and water quality, water resources and flooding

8.3.1. There is the potential for land contamination in the City as a result of historic activity although there is no current danger to health from contaminated land. It is necessary to continue to monitor development sites to ensure that no new source-receptor contamination pathways are created by new development. Water pollution is a legacy of London's combined sewer infrastructure which discharges dilute sewage into the Thames, during periods of heavy rainfall. The Blackfriars Combined Sewer Outflow (CSO) is one of 32 CSOs that will be captured by the Thames Tideway Tunnel improving river water quality by 2019. Along with the rest of south east England the City is an area of water stress. Water conservation is an important consideration and this can be coupled with sustainable drainage (SuDS) to make better use of the water resources available to the City. The City's Strategic Flood Risk Assessment (SFRA) identifies that limited areas of the City are at risk of flooding however climate change could alter the current risk.

8.4. Climate change mitigation and adaptation.

8.4.1. The City is a high energy user, where low and zero carbon energy sources only contribute a small proportion to this energy consumption. Evidence[2] suggests that expansion of district heating and cooling networks, from combined cooling heating and power (CCHP) facilities, is an effective way of reducing carbon emissions in high density urban environments. Demand management and other low carbon energy sources will be important, in order to avoid an overall increase in carbon emissions, given the projected increase in office floorspace during the period of the Local Plan.

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

8.5. Waste

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

8.6. Heritage assets (architectural and archaeological)

8.6.1. As the historic core from which London developed the City has a wealth of heritage assets including listed buildings, archaeological sites, scheduled ancient monuments historic parks and gardens and conservation areas. Pressure for development is intense therefore it is important that these heritage assets contribute to the functioning of the City, through the conversion of underused space to satisfy commercial or social needs. This must be achieved without detracting from the significance of the historic features either within the buildings or in their surrounding settings.

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[2] Community Energy – Urban planning for a low carbon future TCPA & CPHA 2008

8.7. Landscape – protected views

8.7.1. Views of landmark buildings such as St Paul's Cathedral and the Tower of London must be protected alongside modern City developments. Additional tall buildings will be needed to satisfy the need for additional employment space however these buildings must be located so that they do not detract from the protected views of the City's landmark buildings from viewing points within and beyond the City's boundaries.

9. Social Issues

9.1. Population

9.1.1. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important fraction. Provision of some services for the 8,000 people whose usual residence is in the City and the 1,400 with second homes in the City (source: GLA 2014 Demographic Projections – SHLAA DCLG based) entails partnership working with neighbouring boroughs, to ensure that cost effective health, education and social services can be provided. The resident population will increase over the period of the plan but the balance between permanent residents and those with second homes for weekday occupation will need to be monitored so that suitable services can be provided.

9.1.2. The working population is set to increase by up to 100,000 by 2036 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.

9.2. Equality

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

9.3. Housing

9.3.1. The City has a relatively low population of permanent residents (8,000 source GLA 2014 Demographic Projections – SHLAA DCLG based). This is supplemented by 1,400 weekday residents with second homes in the City. 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.

9.3.2. 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.

9.4. Health & wellbeing

9.4.1. The health of the City's workers and residents is generally better than average.

9.4.2. Particular health issues in the City include stress & mental health problems, alcohol, drugs, smoking and air quality related health issues. The promotion and facilitation of healthy lifestyles for the City's workers, residents and visitors must sit alongside the provision of health facilities for these communities. The health facilities at St Bartholomew's hospital have recently undergone transformation as a cardiac and cancer centre of excellence, and will continue to play a major regional role.

9.5. Education & Skills

9.5.1. Educational achievement amongst City residents and workers is relatively high with City businesses demanding a highly skilled workforce. In order to retain this workforce, many of whom have global options, the City must remain an attractive working environment offering professional development opportunities and training. The City has a significant student population including a specialist medical school with a presence at St Bartholomew's Hospital, performing arts at the Guildhall School of Music and Drama in the Barbican and a campus of the London Metropolitan University. The proposed cultural hub in the north of the City could bring challenges and benefits for these institutions. The student population of the City may change from its current level (27,000)

as educational institutions such as the London Metropolitan University consolidate their operations and provincial universities seek satellite space in central London.

9.6. Crime and antisocial behaviour

9.6.1. Crime levels in the City are low making it one of the safest places in the country. The priorities for the City of London Policing Plan include road safety, public order offences, antisocial behaviour, economic crime and fraud. The design of buildings and the public realm can assist in reducing the potential for crime. Co-operation between the planning and licensing functions of the City Corporation can also assist in reducing the potential for anti-social behaviour associated with the growing night time economy in the City.

9.7. Culture & leisure

9.7.1. Leisure and culture form an important part of the balance required between work and personal life for the City's communities and provide potential benefits for London as a whole. The City provides numerous opportunities for fitness, sport and recreation both in sports facilities and in informal settings such as the City's open spaces.

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

10. Stage A4 Integrated Impact Assessment Framework

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

10.2. Table 1 Integrated Impact Assessment Objectives and Criteria

Objective	Criteria
1) Economic growth To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City's status as a leading international financial and business centre.	**Global financial centre, financial & business services, tech & IT, supporting businesses – hotels, retail.** Will the policy provide the business environment to attract and retain global financial, business services and TMT companies? Will the policy provide employment in supporting businesses and services providing a range of job opportunities? Will the policy enable the City to grow and compete with other global financial and business centres? Will the policy help to sustain and increase the City's contribution to the London and UK economies? Will the policy facilitate state-of-the-art digital connectivity and utility infrastructure to support the business City?

Objective	Criteria
2) Built environment and public realm To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities.	**Built environment public realm, digital connectivity, well designed, smart cities, supporting infrastructure**. Will the policy provide an attractive public realm? Will the policy secure high-quality design that enhances the built environment and character of the City? Will the policy enable the efficient use of land? Will the policy enable accessibility for everyone? Will the policy enable high speed digital connectivity? Will the policy facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes? Will the policy enable effective enforcement of planning conditions to reduce adverse impacts of development? Will the policy sustain and enhance the positive contribution made by built heritage to the City's environment?
3) Safe environment and crime reduction To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.	**Crime reduction, antisocial behaviour, fear of crime, security, anti-terrorism** Will the policy reduce crime and fear of crime? Will the policy tackle anti-social behaviour through design, use and management of buildings and spaces? Will the policy provide effective security features within buildings including high profile sites? Will the policy provide effective security in the public realm beyond individual buildings?

Objective	Criteria
4) Heritage Assets To conserve or enhance heritage assets and enable public appreciation and access wherever possible.	**Historic environment, conservation areas, listed buildings, scheduled monuments, historic parks and gardens, world heritage sites, archaeological remains** Will the policy conserve or enhance 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? Will the policy preserve archaeological remains and other heritage assets in situ and allow access for viewing? Will the policy encourage investigation, recording, publication and archiving of historic buildings, archaeological monuments and remains? Will the policy protect the views of historically important landmarks and buildings? Will the policy improve understanding and appreciation of heritage assets including those that are concealed from view? Will the policy successfully balance access, energy efficiency and digital connectivity requirements with the need to conserve and enhance heritage assets?

Objective	Criteria
5) Waste management To decouple waste generation from economic growth enabling a circular economy[3] in the City that minimises waste arisings.	**Decoupling waste generation from economic growth** **materials efficiency, water efficiency, circular economy.** Will the policy reduce waste, including construction and deconstruction waste, food and household waste? Will the policy enable waste to be managed further up the waste hierarchy? Will the policy make efficient use of resources including water? Will the policy facilitate disposal or treatment of waste within or close to the City? Will the policy facilitate sustainable waste transport? Will the policy provide opportunities for businesses to benefit from the circular economy?

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[3] 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
6) Environmental protection To maximise protection and enhancement of the natural environment.	**Air quality**, **water quality, land contamination, light & noise**. Will the policy improve air quality? Will the policy improve water quality and prevent contamination? Will the policy reduce waste water volumes and the risk of sewer flooding, for example through the use of SuDS? Will the policy prevent land contamination and facilitate clean-up of existing contaminated land? Will the policy result in minimisation of noise and light pollution and nuisance? Will the policy provide suitable levels of daylight and sunlight for the City's buildings and open spaces?

Objective	Criteria
7) Climate change mitigation and resilience To mitigate climate change, assist in maintaining energy security and promote climate change resilience.	**Climate change mitigation, carbon emission reduction, energy security, climate change resilience, urban heat island** Will the policy improve energy efficiency or reduce carbon emissions associated with buildings or transport? Will the policy enable the use of low and zero carbon technologies including decentralised energy networks? Will the policy improve energy security for City premises? Will the policy make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)? Will the policy improve the microclimate and ameliorate the heat island effect? Will the policy assist in reducing vulnerability beyond the City (e.g. by supporting TE2100 plan)?

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

Objective	Criteria
9) Biodiversity and Urban Greening To improve opportunities for biodiversity and increase the provision of natural environments.	**Habitats and species, Natura 2000 sites outside the City.** Will the policy increase protection and improve opportunities for biodiversity? Will the policy affect the River Thames as a Site of Metropolitan Importance for Nature Conservation? Will the policy affect any other Sites of Importance for Nature Conservation? Will the policy protect existing trees and increase tree planting? Will the policy increase green roofs, green walls and soft landscaping? **Will the policy affect any Natura 2000 sites?**

Objective	Criteria
10) Transport and Movement To improve the safety, sustainability, efficiency and attractiveness of transport; minimising the negative environmental and health impacts of travel in, to, from and through the City.	**Efficient public transport, low emissions CO2, NOx, particulates, air quality exposure, road safety, promote active transport, delivery vehicles, reduce need to travel.** Will the policy reduce the need to travel? Will the policy improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)? Will the policy encourage active transport (walking and cycling)? Will the policy improve the accessibility of the City's transport network? Will the policy encourage safe, convenient, accessible, economic and efficient public transport? Will the policy reduce the negative impacts of servicing and freight? Will the policy make better use of the river for transport? Will the policy reduce harmful emissions from transport?
11) Housing To deliver an environment that meets the needs and expectations of residents.	**Housing, residential amenity** Will the policy address housing challenges for City residents and workers? (availability and affordability) Will the policy contribute to meeting housing needs in London? Will the policy protect or improve residential amenity?

Objective	Criteria
12 Social and cultural facilities To provide suitable social and cultural facilities for all the City's communities	**Vibrant social environment, leisure, cultural opportunities** Will the policy protect and enhance social, community and cultural facilities which meet the expectations of City workers and residents? Will the policy encourage a vibrant social environment which attracts workers to the City whilst respecting the needs of residents? Will the policy decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport? Will the policy enhance cultural opportunities attracting workers and global businesses to the City? Will the policy ensure the City's historic environment continues to contribute significantly to social and cultural life in the square mile?

Objective	Criteria
13) Health To improve the health of the City's resident, worker and student populations	**Healthy lifestyles, health facilities, access to healthy food, mental health.** Will the policy enable and encourage healthy lifestyles – exercise, healthy food, social interaction etc.? Will the policy maintain or improve access to health facilities? Will the policy reduce exposure to poor air quality? Will the policy provide opportunities for stress reduction? Will the policy reduce problems associated with alcohol and smoking? Will the policy reduce intrusive noise levels? Will the policy improve health and wellbeing through the provision of cultural facilities and activities? Will the policy have negative health impacts beyond the City?

Objective	Criteria
14) Education To enable excellence in education for all the City's communities.	**Education facilities preschool to higher education and professional development.** Will the policy provide educational facilities for nursery pre-school and school age groups, to meet the needs of residents? Will the policy encourage crèche/ nursery facilities to accommodate workers' children? Will the policy encourage appropriate further and higher education opportunities to support local, London wide and national needs? Will the policy provide professional training opportunities for the City's workforce? Will the policy provide training and job opportunities for City residents and City Fringe residents?
15) Equality and inclusion To enable social and economic inclusion in and around the City for workers resident and visitors	**Equality, social integration and wellbeing, poverty reduction, opportunity for all.[4]** Will the policy contribute to the elimination of discrimination, harassment & victimisation? Will the policy advance equality of opportunity between people who share a protected characteristic[5] and those who don't? Will the policy foster good relations between people who share a protected characteristic and those who don't? Will the policy reduce economic inequality for individuals and communities in and around the City?

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[4] 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.

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

10.3. An integrated impact assessment will be carried out to ensure that sustainability is considered alongside equality, health and habitats regulation assessment requirements. Colour coding has been used to indicate where each aspect is being considered within this appraisal framework.

- Equality Impact Assessment (EqIA) criteria

- Health Impact Assessment (HIA) criteria

- Habitats Regulation Assessment (HRA) criteria

- Sustainability Appraisal (SA) criteria

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

↑	Green up arrow - Beneficial Impact
↕	Blue double headed arrow – Uncertain Impact
↑↓	Blue arrow up and down – Both beneficial and negative impacts
↓	Red down arrow – Negative Impact
	Blank – No impact

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

10.5.   IIA objectives compatibility matrix

IIA Objective															
1)Economic growth															
2)Attractive environment	√	√													
3)Crime reduction	√	√	√												
4)Historic assets	x (1)	√	-	√											
5)Waste	x (5)	√	-	-	√										
6)Environmental protection	√	√	-	√	√	√									
7)Climate	√	√	-	√	√	√	√								
8)Open Space	√	√	-	√	-	√	√	√							
9)Biodiversity	-	√	-	-	-	√	√	√	√						
10)Travel & Transport	x (4)	√	√	√	√	√	√	√	-	√					
11)Housing	x (4)	√	√	-	-	√	-	x (2)	-	√	√				
12)Social & cultural facilities	√	√	√	√	-	√	-	√	-	x (3)	√	√			
13) Health	√	√	√	-	√	√	√	√	√	-	√	√	√		
14)Education	√	-	√	√	√	√	√	√	√	-	√	√	√	√	
15)Equality	√	√	√	-	-	-	√	√	-	√	√	√	√	√	√
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

33

√ Compatible

× Conflict

- No impact

(1) The protection of heritage assets could constrain opportunities for additional development but on the other hand an attractive environment including heritage assets could be a factor that helps to attract and retain businesses

(2) Provision of amenity space for housing development could impact on public open spaces

(3) Major cultural facilities are likely to put greater pressure on transport infrastructure including the street environment

(4) The provision of additional office space to meet the need for economic growth is likely to put greater pressure on transport infrastructure, including the street environment

(5) If additional housing is provided close to commercial buildings, this will introduce residential amenity issues that might jeopardise the ability to expand or redevelop commercial premises.

(6) Economic growth could result in greater waste generation however application of circular economy principles could assist in addressing this.

11.   Stage A5 Consultation on the scope of the SA

11.1.   The SEA Directive requires that statutory environmental consultation bodies designated in the SEA regulations are consulted on the scope and level of detail of the information contained within the Scoping Report. The relevant consultation bodies are:

- Environment Agency

- Natural England

- Historic England.

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

- Mayor of London

- Neighbouring Boroughs

- City and Hackney Health and wellbeing board

- City of London Police