



**City of London Corporation**  
**City Plan 2040 — Examination in Public**  
**Matters Statement**

**Main Matter 10 – Healthy and Inclusive City**  
**(Policies S1 and HL1 to HL9)**

## Main Matter 10 – Healthy and Inclusive City (Policies S1 and HL1 to HL9)

- **Are the requirements for a Health and Inclusion set out in Policies S1 and HL1 to HL9 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in ‘general conformity’ with the London Plan?**

Yes, the requirements of the policies in the CP relating to health, inclusion and safety are justified by appropriate available evidence and have regard to national guidance, local context and the London Plan.

The City Plan has been informed by the City Plan 2040 Health Impact Assessment 2024 (ED-HIS1) and the City Plan 2040 Equality Impact Assessment 2023 (ED-HIS2). These documents consider the potential health and equalities impacts in relation to the proposed policies of the City Plan 2040. Their main objective is to provide the City of London Corporation with information to support its decision making process in progressing policies through the Local Plan process. The Plan has also been informed by the Infrastructure Delivery Plan (ED-INF1) which considers current and future needs for facilities and services that enable and support healthy lifestyles.

Paragraph 96 of the NPPF states that buildings and spaces should be inclusive and safe places which promote social interaction and enable and support healthy lifestyles. CP policy (HL1) responds by seeking to ensure the City is inclusive. This is achieved by encouraging major applications to develop and submit equality impact assessments demonstrating how social interaction and safe and healthy places can be achieved. Policy (HL1) also states that the design and use of buildings should meet the highest standards of accessibility and inclusiveness and should foster diversity and social inclusion. The CP enables and supports healthy lifestyles through policies (S1(8)) encouraging and protecting health facilities, (HL8) encouraging play facilities in open spaces, (HL7) encouraging sports and recreation facilities and (HL2) improving air quality.

Paragraph 98 of the NPPF seeks to ensure plans provide for the cultural; (see Matters Statement 6) social and recreational facilities and services the community needs. The CP responds to this requirement by ensuring that existing social and community facilities are replaced and protected policy (S1(12)) and encouraging new facilities, particularly where development results in additional need for facilities policy (HL5(2)).

NPPF paragraph 100 aims to ensure a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. CP policy (S1(7)) seeks to protect and enhance existing schools, educational facilities and higher education providers. The City Corporation works in partnership with neighbouring boroughs to deliver

additional educational facilities in appropriate locations. CP policy (S1(9)) responds by requiring that developments provide training and skills development for young local people while CP policy (S1(11)) encourages nursery and early years educational opportunities for the early years age group.

The CP responds to paragraph 101 in the NPPF that requires planning for required public service infrastructure such as libraries, adult education and health facilities by supporting higher education (S1(7)) and enabling libraries to provide social and educational activities for the community (S1(10)). Policies (S1(7)) and (S24(1)) seek to protect and enhance St. Bartholomew's Hospital.

London Plan Good Growth Objective GG3 seeks to create and maintain a healthy and inclusive environment for all London's communities. The CP policies in Chapter 3 accord with the following London Plan policies.

In accordance with LP Policy S2 which seeks to ensure health and community needs are met in local areas, CP policy (HL5(1)) seeks to secure replacement and protects existing social and community facilities that are subject to development proposals and (HL5(2)) encourages new facilities. Paragraph (3.6.1) states existing social and community facilities will be protected in situ, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities. Paragraph (3.6.2) explains that where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable.

In accordance with LP Policy S3, which seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer sufficient educational opportunities, CP policy (S1) advises that the City Corporation will work with a range of partners to enable all communities to access a wide range of educational opportunities. CP policy (S1(7)) encourages further educational facilities and CP policy (S1(11)) encourages nursery provision and additional childcare facilities. CP policy (S1(10)) supports facilities for the provision and improvement of educational services through the City's libraries.

Encouraging play and informal recreation opportunities is encouraged by LP policy S4. CP policy (HL8) responds by encouraging play and recreation facilities in appropriate locations and where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or provide financial contributions to enable the provision of facilities elsewhere (HL8(d)). Paragraph (3.9.2) advises that public realm improvements and the creation of new open spaces should be designed imaginatively to serve the needs of all the City's communities but also offer informal play opportunities. Where the opportunity arises, the City Corporation will enable appropriate sensory play areas in the City for disabled children, young people and adults and those with special educational needs and disabilities (paragraph 3.9.2).

LP Policy S5 encourages and seeks to protect recreational facilities in London. In line with this aim CP policy (HL7) promotes the expansion of the City’s sport and recreation offer, by encouraging sport and recreation provision as part of appropriate new developments and helping to deliver a network of free outdoor sporting facilities in the City. CP policy (HL7(2a)) seeks to protect existing facilities in situ unless replacement facilities of at least equivalent quality, quantity and accessibility are provided on-site or within the vicinity that meets existing and predicted future needs for this type of facility.

LP Policy S6 promotes free publicly-accessible toilet provision and free ‘Changing Places’ as well as participation in the community toilet scheme. The City Corporation accordingly recognises that adequate provision of toilets is important for the health and well-being of all City communities. CP policy (HL6) encourages a wide spread distribution of publicly accessible toilets, ‘changing places’ for disabled people and their carers (HL6(1)) and participation in the Community Toilet Scheme (HL6(3)). CP Paragraph (3.7.2) states that developers will be expected to provide publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the City’s Community Toilet Scheme, and will seek their provision where appropriate in other major developments such as office and hotel schemes.

LP Policy SI1 advises that development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality. In response, CP policy (HL2) states developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for air quality impact assessments (AQIAs). CP paragraph (3.8.1) and paragraph (3.3.4) requires developers to manage the impact of their proposals on air quality, which should, as a minimum, be air quality neutral. Large-scale developments that are subject to EIA procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City’s air quality.

In accordance with LP policy D14, which seeks to reduce, manage and mitigate noise to improve health and people’s quality of life, CP policy (HL3) sets out the requirements for the reduction and mitigation of noise from construction works, servicing of buildings and licensed premises. Paragraph (3.4.4) states that the City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation’s Code of practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

- **Are the policies relating to Health and Inclusion positively prepared in a way that is aspirational but deliverable’?**

Yes, the policies in the CP relating to health and inclusion are positively prepared in a way that is aspirational but deliverable. The policies will enable facilities such as medical centres, educational, community and sports facilities to be developed, improve air quality and reduce noise nuisance as well as allow opportunities for community and spiritual interaction to be delivered for residential communities as well as the City’s large working population, students and visitors.

CP strategic policy (S1) sets out a high-level vision for improving the health of the City’s communities by providing a broad range of facilities and improving the environment. The vision is clearly expressed through policies (HL1-HL9) which are considered to be capable of delivering the necessary facilities and improvements. This will be achieved through requirements for assessments and statements, compliance with requirements to comprehensively consult neighbouring properties and engage with local communities, follow health impact and equalities guidance, conform with noise and air quality standards and produce design and access statements.

CP (S1) is in accordance with CP Strategic Priority 1.3 in that it supports development that promotes healthy lifestyles and reduces health inequalities, aiming for land uses and facilities to provide access to health, social, educational, sports facilities and environments with good air quality and minimal nuisance. Policy (HL9) acts as an overarching policy to help deliver these elements, as applicants are required to carry out Health Impact Assessments (paragraphs 3.10.4-3.10.7) to assess and mitigate potential issues which may affect people’s health and well-being as well as provide design and access, noise and air quality statements.

The current health and inclusivity policies in the 2015 Local Plan have resulted in an appropriate level of health, sport, community and educational facilities to meet people’s needs and also resulted in improved air quality by reducing traffic and increasing greenery. Air quality in the City has improved since 2017 with a significant reduction of nitrogen dioxide and all particulate matter (City of London Air Quality Strategy 2025-30 paragraphs 2.1-2.3). The CP policies follow a similar approach to the policies in the 2015 LP and have been strengthened. It is therefore anticipated that the CP policies will continue to improve the health of the City’s communities with this successful approach.

- **Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

Yes, the policies in the CP are clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals. The City Corporation considers that Policies (S1) and (HL1 TO HL9) are, in accordance with paragraph (16) of the NPPF, which

requires that they are “...clearly written and unambiguous...” and drafted in such a manner that it is “...evident how a decision maker should react to development proposals”.

Policy clearly sets out relevant thresholds for the type of HIA’s required based on the size of development as well as assessments required for inclusivity, noise and air quality to give certainty to developers as to what they are required to do to maximise health and inclusivity.

To help deliver these elements, applicants are required to carry out health impact assessments to assess and mitigate potential issues which may affect people’s health and well-being. Developers will be expected to identify potential impacts on health resulting from all major developments in the City (paragraph 3.10.4), following the approach set out in the City Corporation’s Health Impact Assessment guidance note (ED-HIS1). A rapid HIA (paragraph 3.10.5) involves focused investigation of health impacts and would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London Healthy Urban Development Unit’s Rapid HIA Tool to reflect the City’s circumstances and will expect this to be used for major developments.

A full HIA (paragraph 3.10.6) will be required on those developments that are subject to an Environmental Impact Assessment. This involves a comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement.

Applicants are also expected to provide design and access statements (HL1 (para 3.2.2)), as well as noise assessments (HL3(1)) and air quality statements (HL2(1)) for major developments with floorspace of 1,000sqm or more.

The healthy and inclusive policies are worded positively with the expectation that the required assessments, statements and compliance with regulations will enable a healthy and inclusive environment. The policies are clear where thresholds and viability considerations apply, such as the requirement for health impact assessments. The policies clearly separate the policy from the supporting text which is divided into ‘Reason for the policy’ and ‘How the policy works’, for maximum clarity.

CP policy (HL1) requires plans for inclusive buildings and spaces to produce design and access statements to ensure accessibility is considered at an early design stage. Paragraph (3.2.2) requires developers to submit design and access statements which demonstrate a commitment to inclusive design and the promotion of equity, diversity and social inclusion. Applicants should engage with relevant user groups, including health and social care providers, at early stages to inform their approach. Design and access statements must include details both on how best practice standards have been complied with, and how inclusion will be maintained and managed throughout the lifetime of the building.

CP policy (HL2) requires Air Quality Impact Assessments to comply with the City of London Air Quality SPD and ensure good air quality. (HL2(1)) requires all developments to be at least air quality neutral and developments subject to an EIA should adopt an air quality positive approach. Major developments must maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>). Paragraph (3.3.3) advises that the Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile.

CP policy (HL3) requires noise impact assessments to comply with the City of London Noise SPD and create peaceful spaces and public realm. Paragraph (3.4.4) states that the City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

CP policy (HL9) requires all developments to consider the potential impact on the health of communities and mitigate adverse impacts where feasible. The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated. Paragraph (3.10.4) advises that developers will be expected to identify potential impacts on health resulting from all major developments in the City, following the approach set out in the City Corporation's HIA guidance note.