



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

Main Matter 13: Climate Resilience and Flood
Risk

Are the requirements for Climate Resilience and Flood Risk set out in Policies S15 and CR1 to CR4 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in ‘general conformity’ with the London Plan?

Policies S15 and CR1 to CR4 are justified by appropriate evidence. They have regard to local strategies, including the City of London Corporate Plan 2024-2029 (ED-COL1) which includes an action to ‘create a climate resilient City by reducing the risk of overheating and flooding’ (p. 48), and an Adaptive Pathways Study and Climate Risk Assessment which was conducted in 2020 (ED-CRE8). This considered six key risks as defined within the UK Committee on Climate Change (UK CCC) 2017 and applied them to the specific context of the Square Mile: flooding, overheating, water stress, biodiversity losses, emerging pests and diseases, and disruption to trade, food and infrastructure.

The City Corporation’s Thermal Comfort Guidelines 2020 (ED-CRE7) provide evidence that support the overheating and urban heat island effect approach in CR1. The City Corporation’s Strategic Flood Risk Assessment 2023 (ED-CRE4) and Local Flood Risk Management Strategy 2021-2027 (ED-CRE5) provide further context to and have informed Policy CR2. Paragraph 13.3.2 also makes clear how Flood Risk Assessments must take account of these strategies. The City Corporation’s Riverside Strategy (ED-CRE6) provides further context to Policy CR4. The City Corporation has put forward a proposed change (PC89, of LD26) to part 13.5.0 which justifies the need for flood protection and flood defence. The Planning for Sustainability SPD 2025 has been developed to provide further support in the implementation of the development plan on sustainability matters, and includes a chapter on Climate Resilience which provides detailed guidance for how developments should address the City’s six key climate risks and embed climate resilience principles through the design process. This detail and context will support the delivery of policies S15 and CR1 – CR4 in the City Plan.

The policies have regard to national planning policy. Paragraph 161 of the NPPF states that ‘*The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change.*’ Chapter 13 introduces proactive policies specifically aimed to improve resilience and to help ensure the City mitigates and adapts to future climate risks, including policies on overheating and the urban heat island effect, flood risk, flood protection and flood defences. Policy CR2 references, applies and supports NPPF paragraphs 170 – 181 on ‘Planning and Flood Risk’. Policy CR3 has been drafted to have regard to the National Standards for Sustainable Drainage Systems. Policy CR4 (paragraph .5.1) supports the Environment Agency’s Thames Estuary 2100 (TE2100) Plan and the Thames river basin district river basin management plan (2022).

The policies are in conformity with the London Plan (2021). Chapter 13 introduces policies to ensure buildings and infrastructure are designed to adapt to a changing climate (S8), make efficient use of water (CR3), reduce impacts from natural hazards like flooding (CR2,

CR3, CR4) and heatwaves (CR1), and mitigate and avoid contributing to the urban heat island effect (CR1), in accordance with Good Growth Policy GG6-B.

London Plan Policy SI 4 ‘Managing Heat Risk’ requires development proposals to minimise impacts on the urban heat island effect and includes a cooling hierarchy to reduce overheating. City Plan policy CR1 aligns to this by stating that building designs should minimise contribution to the urban heat island effect (CR1(2)) and includes measures to reduce the risk of over-heating (CR1 (1)).

London Plan policy SI 12 ‘Flood risk management’ requires Development Plans use the Mayor’s Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. In line with this, City Plan policy CR2 identifies areas of potential flood risk (paragraph 13.3.0 and Policies Map LD2), refers to the City of Corporation Strategic Flood Risk Assessment and Local Flood Risk Management Strategies (paragraph 13.3.2), provides guidance on suitable flood resistance measures (paragraphs 13.3.5 to 13.5.8), and clearly outlines the requirements of a flood risk assessment (CR2 (1) to (4)).

Are the policies relating to Climate Resilience and Flood Risk positively prepared ‘in a way that is aspirational but deliverable’?

Policies S15 and CR1 to CR4 aspire to address key climate-related risks, are supported by appropriate evidence and address strategic issues through conformity with the London Plan. The policies are clearly and positively worded to drive climate resilience and flood risk management. As the policies align to current national and London Planning Policy, and include local contextual factors, they have been prepared in a way that ensures they are deliverable. The flood risk policies build on current policies in the Local Plan 2015, further supporting their deliverability.

Policy CR1 is drafted to list a number of measures that a development should explore to address overheating, aligning to the London Plan cooling hierarchy (Policy SI 4). It is supported by policies in Chapter 12 which encourages the delivery of urban green infrastructure, known to reduce the risk of overheating and the urban heat island effect. The City Corporation considers that the policy is both ambitious to reduce the urban heat island effect but worded flexibly to ensure the design considers all measures, and does not prescribe that all measures must be achieved. The City Corporation’s own Climate Action Strategy (ED-DES4) has funded works through its Cool Streets and Greening program. This has delivered a number of green infrastructure projects that demonstrate what street scene greening measures are deliverable and can improve the resilience of Square Mile’s public realm to overheating and the urban heat island effect. This work has included trialling interventions that would be appropriate as part of development including avenue street tree planting and using climate resilient planting palettes.

A climate risk assessment, triggered by BREEAM credit Wst 05 ‘Adaption to climate change’ should be targeted under CR1 (see paragraph 13.2.3) for all major planning applications. The climate risk assessment should include climate risk identification, assessment, elimination, evaluation and management. The BREEAM credit Wst 05 is currently conditioned on major planning applications.

The City Corporation has proposed some minor amendments to the supporting text included in LD26 which could be implemented to further improve clarity on referenced policy documents and their requirements. PC88 includes reference to ‘positive pump or similar’ on plumbing to prevent sewer discharge (paragraph 13.3.7). PC89 includes reference to the ‘City of London Riverside Strategy’ and clarifies the need for the raising of flood defences by up to 0.5m by 2050 and ‘a further 0.5m’ by 2100 (paragraph 13.5.0). PC90 clarifies that ‘an appropriate and adequate minimum’ set back from flood defences should be discussed with the Environment Agency. PC91 clarifies that flood defence raising should be ‘in line with TE2100 requirements’ and riparian owners are responsible for ‘the maintenance of flood defences’.

Policy CR3 is positively drafted to ensure that all developments incorporate sustainable drainage principles and reduce the rate at which surface water discharges from sites. The policy acknowledges constraints specific to the City context, such as complex underground infrastructure and archaeological and heritage assets. The policy recognises biodiversity enhancements as part of an integrated Sustainable Drainage System (SuDS) approach (CR3-4). Planning application monitoring data demonstrates that since April 2016 when the Lead Local Flood Authority became a statutory consultee, 84 major developments incorporating SuDS measures have been consented, covering an area of 28.5 hectares. Analysis of these proposals demonstrate that water discharge rates increasingly being reduced to the maximum possible.

Do the policies give clear direction as to how a decision maker should react to a development proposal?

Policies S15 and CR1 to CR4 are drafted in accordance with NPPF paragraph 16, as such that they are clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal. Each policy clearly addresses a climate risk, ensuring developments are designed to be adaptable to future climate scenarios.

Policy S15 as the overarching strategic policy provides clear direction for the other non-strategic policies within the Chapter, for example S15(1) states that developments must minimise the risk of overheating and any adverse contribution to the urban heat island effect. This is supported by policy CR1 ‘Overheating and urban heat island effect’.

All of the policies are supported by two sections of supporting text. ‘Reason for the policy’ provides further context on the relevant climate risks and their potential impact on the Square Mile. ‘How the policy works’ outlines the document requirements, references relevant supplementary guidance and other policies in the City Plan that support its delivery and/or provide co-benefits. For example, Policy CR2 references the Policies Map (LD2) which identifies Flood Risk Areas, includes a table of ‘Flood risk vulnerability’ classifications from Annex 3 of the NPPF and references supplementary policies such as the Strategic Flood Risk Assessment (ED-CRE4) and Local Flood Risk Management Strategy (ED-CRE5). The references to supplementary guidance and other policies avoid unnecessary duplication of policies and supports their implementation.

Policies S15 and CR1 to CR4 and the supporting text clearly identify development requirements and document required to inform a decision maker. The policies set clear thresholds, for example, major developments are required to include details of adaptation and resilience measures in their Sustainability Statements, and target BREEAM Wst 05 credits for adaptation to climate change (paragraph 13.2.2). Minor developments should include details of climate resilience and adaptation measures in the Design and Access Statement (paragraph 13.2.3). Policy CR2 clearly identifies what developments must submit a Flood Risk Assessment. Policy CR3 requires major developments to submit a SuDS and Drainage plan and an operational maintenance plan, and minor developments should include an appropriate risk statement in the Design and Access Statement (paragraph 13.4.5). Policy CR4 identifies requirements for developments adjacent to flood defences, including discussions with the Environment Agency (paragraph 13.5.1).