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City of London Transport Strategy Integrated Impact Assessment

Non-Technical Summary

Prepared by LUC
March 2019

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Contents

1	Introduction	1
	The City of London Transport Strategy	1
2	Integrated Impact Assessment	3
	Methodology	10
	Consultation	11
	Difficulties encountered	11
3	Environmental Context	12
	Review of plans, policies and programmes	12
	Baseline information and key sustainability issues	13
4	IIA Findings for the Transport Strategy	19
	Economic growth	28
	Built environment and the public realm	28
	Safe environment and crime reduction	28
	Heritage assets	28
	Waste management	29
	Environmental protection	29
	Climate change mitigation and resilience	29
	Open spaces	29
	Biodiversity and urban greening	29
	Social and cultural facilities	30
	Health	30
	Education	30
	Equality and inclusion	30
	Reasonable alternatives	31
5	Conclusions and monitoring	32
	Conclusions	32
	Monitoring proposals	32

1 Introduction

- 1.1 This Non-Technical Summary relates to the Integrated Impact Assessment (IIA) Report for the City of London Transport Strategy. The City of London Strategy is being produced by the City Corporation and will set out the City's vision for all aspects of City transport in the future, setting the 25 year framework for the future management of the streets and for improvements to transport connections. The City of London Transport Strategy should be read in conjunction with its Delivery Plan, which comprises the draft Local Implementation Plan (LIP) and which, when finalised will incorporate the City's wider transport projects. The Delivery Plan LIP has been subject to a separate IIA.
- 1.2 Integrated Impact Assessment brings together Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process based on SA methodology. The City Corporation has commissioned independent consultants (LUC) to carry out the IIA of the Transport Strategy on its behalf. The IIA Scoping Report, IIA Report and this Non-Technical Summary incorporate all of the work undertaken by LUC.
- 1.3 This Non-Technical Summary relates to the full IIA for the Transport Strategy.

The City of London Transport Strategy

- 1.4 How people and goods travel to and around the City has a significant impact on the experience of living, working and studying in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and vehicles serving the City, alongside improving the quality of streets and public spaces, will be essential to the continued success of the City as a global centre for business and a cultural destination.
- 1.5 The City of London Transport Strategy provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion. It also sets out the City's aspirations for improvements to the Transport for London Road Network (TLRN, also known as 'Red Routes') and local, national and international transport connections. It details an ambitious approach to transport and the design and management of streets in response to the challenges arising from significant growth, fast moving technological development and changing travel habits.
- 1.6 Additionally, the City Corporation, along with the London Boroughs, is required to produce a Local Implementation Plan (LIP) that details how it will support the delivery of the Mayor's Transport Strategy (MTS). The City's draft LIP Delivery Plan will be published alongside the City of London Transport Strategy and highlights the alignment between the vision, aims and outcomes of the City of London Transport Strategy and the MTS. Delivery Plan for the City of London Transport Strategy also provides a breakdown of the projects that will be delivered over the next three years with Transport for London funding. The final Delivery Plan will incorporate all the City's transport projects. The LIP Delivery Plan has been subject to a separate IIA.
- 1.7 As stated above, the Transport Strategy includes detailed proposals for achieving a number of outcomes. The main outcomes of the document and proposals for achieving these are:
 - Healthy Streets Approach.
 - The Square Mile's Streets are great places to walk and spend time.
 - Street space is used more efficiently and effectively.
 - The Square Mile is accessible to all.
 - People using our streets and public spaces are safe and feel safe.

- A wide range of people choose to cycle.
- The Square Mile's air and streets are cleaner and quieter.
- Delivery and servicing needs are met more efficiently and impacts are minimised.
- Our street network is resilient to changing circumstances.
- Emerging transport technologies benefit the Square Mile.
- The Square Mile benefits from better transport connections.

2 Integrated Impact Assessment

- 2.1 IIA brings together Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process based on the SA methodology.
- 2.2 SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 2.3 SEA is also a statutory assessment process, required under SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA).
- 2.4 SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan, while SA includes a wider range of considerations, extending to social and economic impacts.
- 2.5 The requirement to undertake EqIA of plans was introduced in the Equality Act 2010, but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- 2.6 HIA is not a statutory requirement but can support decision making by identifying possible impacts of a plan on the health of a community.
- 2.7 In addition to complying with legal requirements, the approach taken to the IIA of the Transport Strategy is based on current best practice and guidance set out in the National Planning Practice Guidance. The following paragraphs describe the approach that has been taken to the IIA and provides information on the subsequent stages of the process.

Stage A: Scoping

- 2.8 The IIA process began in April 2018 with the production by LUC of a Scoping Report for the Transport Strategy and Local Implementation Plan (LIP).
- 2.9 The scoping stage involved collating information about the environmental baseline for the Transport Strategy area and the key environmental issues facing it, as well as information about the policy context for the preparation of the Strategy. The IIA Scoping Report presented the outputs of the following tasks:
 - Policies, plans and programmes of relevance to the Transport Strategy were identified and the relationships between them were considered. The policy, plan and programme review can be found in **Chapter 3** and **Appendix 2** of the main IIA report.
 - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, (including flora and fauna); population; human health; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage and landscape. This baseline information, (presented in **Chapter 3** and **Appendix 3** of the main IIA report), provides the basis for predicting and monitoring the likely effects of the Strategy and helps to identify alternative ways of dealing with any adverse effects identified.
 - Drawing on the review of relevant plans, policies and programmes and the baseline information, key environmental issues for the City were identified (including environmental

problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue if the Transport Strategy were not to be implemented. If, drawing on the baseline information and relevant plans, policies and programmes it was considered that the Transport Strategy was unlikely to have significant effects upon certain SEA topics, they were scoped out.

- An IIA 'framework' was then presented, setting out the IIA objectives against those which the proposals of the Transport Strategy would be appraised. The IIA framework provides a way in which the impacts of implementing a plan and reasonable alternatives (i.e. options) can be described, analysed and compared. The IIA framework comprises a series of sustainability objectives and associated questions that can be used to 'interrogate' options during the plan-making process. These IIA objectives define the long-term aspirations of the City with regard to sustainability issues. During the IIA, the performance of the options is assessed against these IIA objectives and questions.

2.10 **Table 2.1** presents the IIA objectives in the Transport Strategy IIA framework and shows how the SEA Regulations topics have been covered by these. It also shows which objectives relate to which element of the IIA (Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment).

Table 2.1 IIA Framework

IIA Objectives	SEA Regulations Topic(s) covered	Appraisal question	SA	EqIA	HIA
<p>Economic growth</p> <p>To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City’s status as a leading international financial and business centre and to help enable the continuing success of its historic visitor attractions.</p>	Population	Will the strategy / plan provide the business environment to attract and retain global financial, business services and TMT companies?	X		
		Will the strategy / plan provide the business environment to attract, retain and support SMEs?	X		
		Will the policy provide employment in supporting businesses and services providing a range of job opportunities?	X		
		Will the strategy / plan enable the City to grow and compete with other global financial and business centres?	X		
		Will the strategy / plan help to sustain and increase the City’s contribution to the London and UK economies?	X		
		Will the strategy / plan enable the successful management of pedestrian and visitor movements and support the continuing growth of the tourism sector and visitor attractions?	X		
		Will the strategy / plan unlock heritage-led regeneration opportunities?	X		
<p>Built environment and public realm</p> <p>To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities that respects and enhances local character and distinctiveness.</p>	Landscape Population Human health Material assets	Will the strategy / plan provide an attractive public realm?	X		
		Will the strategy / plan secure high-quality design that enhances the built environment and character of the City?	X		
		Will the strategy / plan enable the efficient use of land?	X		
		Will the strategy / plan enable accessibility for everyone?	X	X	X
		Will the strategy / plan facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes?	X		
		Will the strategy / plan enable effective enforcement of planning conditions to reduce adverse impacts of development?	X		
		Will the strategy / plan make better use of the river for transport?	X		
<p>Safe environment and crime reduction</p> <p>To reduce crime and antisocial behaviour and to manage and respond to the security challenges</p>	Population Human health	Will the plan / strategy reduce crime and fear of crime?	X		X
		Will the plan / strategy tackle anti-social behaviour through design, use and management of buildings and spaces?	X		
		Will the plan / strategy provide effective security in the public realm beyond individual buildings?	X		

IIA Objectives	SEA Regulations Topic(s) covered	Appraisal question	SA	EqIA	HIA
that the City faces.		Will the plan / strategy help to reduce moped crime in the City?	X		X
Heritage assets To conserve and enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.	Cultural heritage Landscape	Will the plan / strategy 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?	X		
		Will the plan / strategy preserve archaeological remains and other heritage assets in situ and allow access for viewing?	X		
		Will the strategy / plan protect the views of historically important landmarks and buildings?	X		
		Will the strategy / plan successfully balance access, energy efficiency and digital connectivity requirements with the need to conserve and enhance heritage assets?	X		
		Will the strategy / plan contribute to the better management of heritage assets and tackle heritage at risk?	X		
Waste management To decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arising.	Material assets	Will the policy enable waste to be managed further up the waste hierarchy?	X		
		Will the strategy / plan facilitate sustainable waste transport?	X		
		Will the strategy / plan provide opportunities for businesses to benefit from the circular economy?	X		
		Will the strategy / plan encourage the transport of materials by rail or river where possible?	X		
		Will the strategy / plan safeguard existing wharves, particularly Walbrook Wharf?	X		
Environmental protection (pollution) To maximise protection and enhancement of the natural environment.	Biodiversity, flora and fauna Water Soil	Will the strategy /plan improve air quality?	X		X
		Will the strategy / plan improve water quality and prevent contamination?	X		X
		Will the strategy / plan improve water quality by reducing diffuse urban pollution?	X		X
		Will the strategy / plan reduce waste water volumes and the risk of sewer flooding, for example through the use of SuDS?	X		X

IIA Objectives	SEA Regulations Topic(s) covered	Appraisal question	SA	EqIA	HIA
		Will the strategy / plan result in minimisation of noise and light pollution and nuisance?	X		X
		Will the strategy / plan reduce harmful emissions from transport?	X		X
Climate change mitigation and resilience To mitigate climate change, assist in maintaining energy security and promote climate change resilience.	Climatic factors Air	Will the strategy / plan improve energy efficiency or reduce carbon emissions associated with buildings or transport?	X		
		Will the strategy / plan enable the use of low and zero carbon technologies including decentralised energy networks?	X		
		Will the strategy / plan improve energy security for City premises?	X		
		Will the strategy / plan make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)?	X		X
		Will the strategy / plan improve the microclimate and ameliorate the heat island effect?	X		X
		Will the strategy / plan assist in reducing vulnerability to flood risk within and beyond the City (e.g. by supporting TE2100 plan)?	X		X
Open spaces To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.	Landscape Population Human health	Will the strategy / plan protect existing open spaces and streets?	X		X
		Will the strategy / plan increase the amount of publicly accessible open space?	X	X	X
		Will the strategy / plan improve the quality and design of existing open spaces and streets?	X	X	X
		Will the strategy / plan enhance tranquillity of open spaces and streets?	X		X
		Will the strategy / plan encourage multiple uses for open spaces such as sport, recreation, relaxation, food growing, public and private events (subject to local byelaws)?	X		X
		Will the strategy / plan ensure that open spaces reflect and interpret the local distinctiveness of an area, particularly in historic places?	X		
		Will the strategy / plan provide new or improve existing amenity space?	X		X
		Will the strategy / plan improve access for all to the City's public realm and open spaces?	X	X	X

IIA Objectives	SEA Regulations Topic(s) covered	Appraisal question	SA	EqIA	HIA
Biodiversity and urban greening To improve opportunities for biodiversity and increase the provision of natural environments.	Biodiversity, flora and fauna	Will the strategy / plan increase protection and improve opportunities for biodiversity in particular black redstarts, sparrows, bats and stag beetles?	X		
		Will the strategy / plan 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)?	X		
		Will the strategy / plan affect any other Sites of Importance for Nature Conservation?	X		
		Will the strategy / plan protect existing trees and increase tree planting?	X		
		Will the strategy / plan increase green roofs, green walls and soft landscaping and lead to their positive management for biodiversity?	X		
		Will the strategy / plan affect any Natura 2000 sites?	X		
		Will the strategy / plan protect or improve residential amenity?	X		X
Social and cultural facilities To provide suitable social and cultural facilities for all the City's communities.	Population	Will the strategy / plan encourage a vibrant social environment which attracts workers to the City whilst respecting the needs of residents?	X		
		Will the strategy / plan decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport?	X	X	X
		Will the strategy / plan ensure the City's historic environment continues to contribute significantly to social and cultural life in the square mile?	X		
Health To improve the health of the City's resident, worker and student populations.	Human health	Will the strategy / plan enable and encourage healthy lifestyles – exercise, healthy food, social interaction etc.?	X		X
		Will the strategy / plan maintain or improve access to health facilities?	X		X
		Will the strategy / plan reduce exposure to poor air quality?	X		X
		Will the strategy / plan provide opportunities for stress reduction?	X		X
		Will the strategy / plan reduce intrusive noise levels?	X		X
		Will the strategy / plan improve health and wellbeing through the provision of cultural facilities and activities?	X		X
		Will the strategy / plan have negative health impacts beyond the City?	X		X
Will the strategy / plan improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)?	X	X	X		

IIA Objectives	SEA Regulations Topic(s) covered	Appraisal question	SA	EqIA	HIA
		Will the strategy / plan encourage active transport (walking and cycling)?	X		X
Education To enable excellence in education for all the City's communities.	Population	Will the strategy / plan enable access to educational facilities in the City?	X	X	
Equality and inclusion To enable social and economic inclusion in and around the City for workers, residents and visitors.	Population Human health	Will the strategy / plan contribute to the elimination of discrimination, harassment & victimisation?	X	X	
		Will the strategy / plan advance equality of opportunity between people who share a protected characteristics and those who don't, particularly the disabled and elderly?	X	X	
		Will the strategy / plan reduce economic inequality for individuals and communities in and around the City?	X	X	
		Will the strategy / plan improve the accessibility of the City's transport network?	X	X	
		Will the strategy / plan encourage safe, convenient, accessible, economic and efficient public transport?	X	X	X

Stage B: Developing and refining options and assessing effects

- 2.11 Developing options for a plan is an iterative process, which can involve a number of rounds of consultation with stakeholders and the public. Consultation responses and the IIA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Transport Strategy, options include different proposals for improving transport and public realm within the City.
- 2.12 Alternative options have been considered for proposals 9, 10, 16, 20, 22, 29, 30 and 36 and include: the continuation of current measures; the use of traditional road safety approaches; and the banning of all motor vehicles in a zone. The alternatives for proposals 9 and 10 were unachievable and so were not considered reasonable alternatives and were not assessed.
- 2.13 The City of London Corporation's reasons for either taking forward each reasonable alternative in the Transport Strategy or for rejecting it are described in **Appendix 4** of the main IIA Report.

Stage C: Preparing the Integrated Impact Assessment Report

- 2.14 The IIA report describes the process that has been undertaken in carrying out the IIA of the Transport Strategy. It sets out the findings of the appraisal of the Transport Strategy's outcomes / proposals. Where any significant negative effects are identified, recommendations are made for preventing, reducing or offsetting these.

Stage D: Consultation on the Transport Strategy

- 2.15 The City of London invited comments on the draft Vision, Aims and Outcomes for the Transport Strategy and the accompanying IIA commentary in June / July 2018. No comments were received on the IIA commentary.
- 2.16 The draft Transport Strategy and the accompanying IIA were consulted on between November 2018 and January 2019. Again, no comments were received on the IIA, and this IIA has been updated only to reflect the minor changes made to the Transport Strategy.

Stage E: Monitoring implementation of the Transport Strategy

- 2.17 Monitoring of the significant sustainability effects of implementing the Strategy should be carried out after its adoption. Initial suggestions for monitoring are presented in **Chapter 5** of the main IIA Report.

Methodology

- 2.18 The reasonable alternative proposals and the selected proposals set out in the Transport Strategy have been appraised against the IIA objectives in the IIA framework with scores being attributed to each option to indicate its likely effects on the baseline in relation to achievement of each objective as set out in **Figure 2.1**.

Figure 2.1 Key to symbols and colour coding used in the IIA

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
?	Likely effect uncertain
+/-	Mixed effect likely

- 2.19 The dividing line in making a decision about the significance of an effect is often quite small. Where either ‘++’ or ‘--’ has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option in relation to the SEA objective in question is considered to be of such a magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Consultation

- 2.20 Public and stakeholder participation is an important element of the IIA and wider plan/making process. It helps to ensure that the IIA report is robust and has due regard for all appropriate information that will support the Transport Strategy in making a contribution to sustainable development. The IIA Scoping Report for the Transport Strategy was published in April 2018 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England) and Transport for London / Greater London Authority. The comments received were then reviewed and addressed as appropriate in subsequent stages of the IIA. **Appendix 1** of the main IIA report lists the comments that were received during the IIA scoping consultation and describes how each one was addressed.
- 2.21 The draft Vision, Aims and Outcomes document and the accompany IIA commentary were consulted on between June and July 2018, and the final draft Transport Strategy and IIA were consulted on between November 2018 and January 2019. No comments were received in regards to the IIA from either consultation.

Difficulties encountered

- 2.22 It is a requirement of the SEA Regulations that the SA Report describes any data limitations or other difficulties that are encountered during the SEA process.
- 2.23 There were very few difficulties encountered during the IIA of the Transport Strategy. However, due to the high level nature of the outcomes and proposals in the Strategy, at times it has been more difficult to assess in detail or with great certainty the likely effects of the outcomes and proposals in relation to each IIA objective.

3 Environmental Context

Review of plans, policies and programmes

- 3.1 The Transport Strategy is not prepared in isolation but should seek to address relevant sustainability objectives set at an international and national level as well as sustainability issues facing the City of London. The IIA therefore gathers information on relevant international and national plans, policies, and programmes and on the sustainability baseline and uses this information to inform the framework of objectives against which the Transport Strategy is assessed.

International policy

- 3.2 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') is particularly important as it sets out the requirements for SEA. SEA should be undertaken iteratively and integrated into the production of the Transport Strategy in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 3.3 There are a wide range of EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been summarised in **Appendix 2** of the main IIA report for completeness.

National policy

- 3.4 There is also a wide range of national level plans, policies and programmes with relevant objectives for the IIA, which are summarised in **Appendix 2** of the main IIA report. Amongst the most significant national policy documents providing context for the Transport Strategy are the Transport Investment Strategy (2017), the Air Quality Strategy for England (2007), and the National Planning Policy Framework (2018) and associated Planning Practice Guidance¹.

Regional policy

- 3.5 There are a number of regional policy documents that the Transport Strategy will need to have due regard to. These are summarised in **Appendix 2** of the full IIA report and include:
- The London Plan² and the new London Plan³.
 - The Mayor's Transport Strategy 2018⁴.
 - The Mayor of London River Action Plan 2013⁵.
 - A City for all Londoners 2016⁶.
 - Environment Strategy (2018)⁷.
 - Housing Strategy (2018)⁸.

¹ <http://planningguidance.planningportal.gov.uk/>

² The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011, Mayor of London, March 2016

³ The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation, December 2017

⁴ The Mayor's Transport Strategy, March 2018

⁵ River Action Plan, Mayor of London and Transport for London, February 2013

⁶ A City for all Londoners, Mayor of London, October 2016

⁷ Mayor of London, London Environment Strategy, May 2018.

⁸ Mayor of London, London Housing Strategy, May 2018.

City of London policy

- 3.6 The following is a list of relevant City of London Policy and documents that the Transport Strategy and LIP should be guided by and be in conformity with. Outlines of the documents are included in **Appendix 2** of the full IIA report.
- City of London Local Plan 2015⁹.
 - The Standard Highway and Servicing Requirements for Developments in the City of London¹⁰.
 - The City of London Air Quality Strategy 2015-2020¹¹.
 - The City of London Noise Strategy 2016–2026¹².
 - The City of London Road Danger Reduction and Active Travel Plan¹³.
 - The Thames Strategy Supplementary Planning Document ¹⁴.
 - The City of London Public Realm Supplementary Planning Document ¹⁵.
 - Freight and Servicing Supplementary Planning Document¹⁶.

Baseline information and key sustainability issues

Baseline information

- 3.7 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps identify key sustainability issues and means of dealing with them.
- 3.8 The baseline information for the City of London, which was originally presented in the Scoping Report is set out in **Appendix 3** of the full IIA report.

Key sustainability issues

- 3.9 Together with the sustainability objectives set by other plans, policies and programmes, the sustainability issues facing the City of London inform the framework of objectives against which the Transport Strategy is assessed.
- 3.10 The key sustainability issues facing the City of London and their evolution without the Transport Strategy were identified during the scoping stage of the IIA and are presented in the Scoping Report. This information is reproduced in **Table 3.1**.

⁹ The City of London Local Plan, January 2015

¹⁰ Standard Highway and Servicing Requirements for Developments in the City of London, City of London, 2007

¹¹ City of London Air Quality Strategy 2015-2020, City of London, June 2015

¹² City of London Noise Strategy 2016 to 2026,

¹³ City of London Road Danger and Active Travel Plan 2018-2023

¹⁴ City of London Thames Strategy Supplementary Planning Document, June 2015

¹⁵ City Public Realm, People Places Projects Supplementary Planning Document, July 2016

¹⁶ City of London Freight and Servicing Supplementary Planning Document, February 2018

Table 3.1 Key sustainability issues for the City of London and their likely evolution without the Transport Strategy

Sustainability issues of relevance to the Transport Strategy	Likely evolution without the Transport Strategy	IIA objective
Climatic Factors		
<p>While total energy consumption and associated carbon emissions for the City show a declining trend, they continue to result in significant carbon emissions which contribute to climate change.</p> <p>While the most of the City’s emissions are from its commercial activities, motorised transport also contributes and the Transport Strategy and LIP provide a means of reducing transport emissions.</p>	<p>The implementation of the Transport Strategy and LIP offer opportunities to further tackle this issue through measures to reduce motorised transport – a major contributor to carbon emissions, and promote and improve active travel and public transport. Without the implementation of the Transport Strategy and LIP it is considered that a reduction in carbon emissions is still achievable with the support of policies in the Local Plan but this may be to a lesser extent or be achieved over a longer time scale as the issues associated with motorised transport will not be as well addressed. However as a global issue, climate change will continue to be a key consideration, regardless of the policies and measures within both the Local Plan and the Transport Strategy and LIP.</p>	<p>Objective 6 – Environmental protection (pollution)</p> <p>Objective 7 – Climate change mitigation and resilience</p>
Biodiversity, Flora and Fauna		
<p>The baseline information identifies a number of priority habitats, Sites of Metropolitan Importance for Nature Conservation (Tidal Thames) and Sites of Importance for Nature Conservation.</p> <p>Changes to streets, the public realm, river transport and / or vehicle movements may have the potential to impact upon these habitats.</p>	<p>The implementation of the Transport Strategy and LIP may further benefit these habitats through its aims, such as the reduction in road traffic however, the impact is unknown. If the Transport Strategy were not to be implemented it is considered that adequate protection would be afforded to the City’s habitats and species through policies within the Local Plan as well as supporting documents such as the Biodiversity Action Plan.</p>	<p>Objective 9 – Biodiversity and urban greening</p>

Sustainability issues of relevance to the Transport Strategy	Likely evolution without the Transport Strategy	IIA objective
Cultural Heritage and Landscape		
<p>The City is the historic core from which London developed. Consequently it is an area of great archaeological importance and contains many buildings and areas of historic and architectural value.</p> <p>Changes to streets and / or vehicle movements, including public realm improvement proposals designed to manage increasing numbers of pedestrians, may affect the settings and views of city landmarks, listed buildings and other heritage assets and can affect archaeological remains.</p>	<p>The implementation of the Transport Strategy and LIP may add further protection to these assets through its aims, such as the reduction in road traffic however, the impact is unknown. If the Transport Strategy were not to be implemented it is considered that more than adequate protection would still be afforded to the City's heritage and archaeological assets through policies within the Local Plan as well as supporting documents such as Conservation Area Plans.</p>	<p>Objective 2 – Built environment and public realm Objective 4 – Heritage assets</p>
Air quality		
<p>The City has some of the highest levels of air pollution in the country due to its location at the heart of London and the density of development. Levels of pollutants in the City such as sulphur dioxide, carbon monoxide and benzene have reduced over the past decade but levels of fine particulates (PM10) and nitrogen dioxide (NO₂) remain high. For this reason the City of London is a designated AQMA. Exposure to these pollutants is considered to be a significant cause of ill health.</p>	<p>The implementation of the Transport Strategy offers an opportunity to further improve air quality in the City through, for example the reduction in vehicular traffic and congestion. Although it is considered that the issue of air quality is addressed in the Local Plan, the Transport Strategy would lend further measures and support to this and ensure that vehicular traffic does not contribute to a decline in air quality. In terms of a reduction in traffic, the Local Plan sets out a number of policies to this effect and it is considered that the Transport Strategy and LIP would lend further support to these policies in the reduction in traffic and congestion and a decrease in pollution. In the absence of the Transport Strategy and LIP, the policies in the</p>	<p>Objective 6 – Environmental protection (pollution) Objective 12 - Health</p>

Sustainability issues of relevance to the Transport Strategy	Likely evolution without the Transport Strategy	IIA objective
<p>Much of the air pollution in the City is associated with vehicle emissions, and so a reduction in emissions should be sought.</p>	<p>Local Plan will work towards this reduction with support from forthcoming GLA policies such as the Ultra Low Emissions Zone but the Strategy will further support these measures.</p>	
Water and soils		
<p>Vehicular transport has the potential to pollute water in the City. Pollutants from transport can enter surface or ground water either directly or indirectly and can spread to other water bodies, such as the River Thames. The water quality of the Thames has been decreasing in recent years and is now classed as moderate.</p>	<p>Whilst not setting out specific aims in regards to water quality, the Transport Strategy and LIP have the potential to reduce pollution of water in the City through its aim to cut motorised transport. It is considered that without the transport strategy the Local Plan would provide adequate protection however, reducing water pollution from transport may not be so easily achieved without the Transport Strategy and LIP.</p>	<p>Objective 6 – Environmental protection (pollution)</p>
Population		
<p>The baseline information shows that the resident, working and visitor populations of the City are expected to rise. An efficient transport network is required to accommodate these additional people and protect against traffic congestion.</p>	<p>The current population trends of the City are expected to continue with or without the implementation of the Transport Strategy, supported by policies in the Local Plan. The Transport Strategy and LIP are expected to support and facilitate the rise in population.</p>	<p>Objective 1 – Economic growth Objective 2 – Built environment and public realm Objective 3 – Safe environment and crime reduction Objective 8 – Open spaces Objective 10 - Housing Objective 11 – Social and cultural facilities Objective 12 – Health Objective 13 – Education Objective 14 – Equality and inclusion</p>

Sustainability issues of relevance to the Transport Strategy	Likely evolution without the Transport Strategy	IIA objective
Health		
<p>Consideration of health for the City must take account of the health of the resident, working and visitor populations. Therefore the City must be designed to encourage healthy lifestyles through the provision of facilities for walking and cycling as well as improving safety for pedestrians and cyclists and improving air quality.</p>	<p>The Transport Strategy and LIP have the potential to further improve the health of the City's residents and working population through the reduction in road traffic, congestion and air pollution, and the promotion of active travel. Without the implementation of the Transport Strategy and LIP, health targets will still be in place but the effects of air quality may be more of a barrier to meeting these, along with road traffic and noise pollution.</p>	<p>Objective 3 – Safe environment and crime reduction Objective 12 – Health Objective 14 – Equality and inclusion</p>
Equality		
<p>The City of London is generally affluent however, areas around it fall into some of the most deprived areas in the country.</p> <p>Some Index of Multiple Deprivation domains illustrate the issues the City currently has with housing, air quality and road traffic incidents.</p>	<p>Without the implementation of the Transport Strategy and LIP, the policies in the Local Plan will continue to address these issues. However, the Transport Strategy and LIP, particularly in regards to air quality and road traffic incidents, will make meeting targets much more achievable.</p>	<p>Objective 8 – Open spaces Objective 10 – Housing Objective 11 – Social and cultural facilities Objective 13 – Education Objective 14 – Equality and inclusion</p>
Material assets		
<p>Office space is the predominant land use in the City, serving its large working day population. The City Corporation aims to ensure that people have a range of sustainable modes of transport to choose from when travelling to and from work and is working to ensure that a high</p>	<p>Although the Local Plan includes policies aimed at promoting sustainable transport, the Transport Strategy and LIP will build upon and add further weight to this. Without the production of the Transport Strategy and LIP the Local Plan policies will still be in place, but could be harder to meet.</p>	<p>Objective 1 – Economic growth Objective 2 – Built environment and public realm Objective 8 – Open spaces</p>

Sustainability issues of relevance to the Transport Strategy	Likely evolution without the Transport Strategy	IIA objective
quality public realm is provided.		
Waste		
<p>The City itself has no waste management sites so all waste has to be transported elsewhere.</p> <p>The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated.</p>	<p>In the absence of the Transport Strategy and LIP, the Local Plan and supporting documents provide a range of policies and measures that will work to reduce waste and waste transfer in the City.</p>	Objective 5 – Waste management
Economy		
<p>The City of London is a leading financial and business centre. Offices are the predominant land use and the largest industrial sector is business services and banking. Economic growth in the City is expected to continue and accelerate.</p>	<p>The Local Plan will support the economic development of the City with or without the implementation of the Transport Strategy. However, the Transport Strategy and LIP will support and assist in the continued economic development of the City through improved accessibility and transport infrastructure for those who work in the area, potentially making the City a more attractive place for businesses and workers.</p>	Objective 1 – Economic growth

4 IIA Findings for the Transport Strategy

- 4.1 This chapter presents the IIA findings for the proposals selected by the City of London for inclusion under each outcome in the Transport Strategy and for the reasonable alternatives to these proposals considered by the City but not taken forward in the Strategy.
- 4.2 A total of 11 outcomes with associated proposals have been set out in the Strategy and are subject to IIA. A summary table is provided in **Table 4.1** below, which sets out the scores for each proposal against each IIA objective. The table is followed by a narrative summary of the IIA results.
- 4.3 It is noted that there is a section at the end of the Transport Strategy titled 'Delivering the Strategy' which contains three proposals. Unlike all of the other proposals in the Strategy these three have not been assessed as they relate only to how the Strategy will be delivered and monitored and do not specifically propose anything new or any changes to transport and streets in the City.

Cumulative effects

- 4.4 Cumulative effects have been considered in terms of the impact of the Transport Strategy as whole (i.e. all of the outcomes and proposals within each outcome) on each IIA objective, as well as the cumulative effect of the Transport Strategy in combination with other London wide plans and schemes. For this the Integrated Impact Assessment of the draft London Plan prepared by Arup in November 2017 has been considered, and it is the results of the IIA of the preferred strategic options and emerging policies of the draft London Plan that have been reviewed.
- 4.5 **Table 4.1** below shows all of the scores for the outcomes and proposals in the Transport Strategy and the narrative summary following the table considers the overall impact on the IIA objectives and the cumulative effect of the Transport Strategy with the draft London Plan on the IIA objectives.

Table 4.1 Summary of IIA scores

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
Outcome: Healthy Streets Approach													
1 Embed the Healthy Streets Approach in transport planning and delivery	+	++	+	+	0	++	++	++	+	+	++	0	++
Outcome: The Square Mile’s streets are great places to walk and spend time													
2 Put the needs of people walking first when designing and manging our streets	+/-	++	++	0	0	++	++	+	0	+	++	0	+
3 Complete the riverside walkway and improve walking connections between the riverside and the rest of the City	+	++	+	0	0	+	+	++	0	++	+	0	0
4 Enhance the Barbican high walks	0	+	+	0	0	0	0	+	0	0	+	0	+
5 Ensure new developments contribute to improving the experience of walking and spending time on the City’s streets	+	++	0	+	0	+	+	+	0	+	++	0	+
6 Promote and celebrate walking	0	+	+	0	0	++	++	+	0	0	++	0	+

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
7 Provide more public space and deliver world-class public realm	+?	++	+	++	0	+	+	++	+	+	++	0	+
8 Incorporate more greenery into the City's streets and public spaces	0	++	0	+	0	++	++	++	++	0	++	0	0
9 Reduce rainwater run-off on City streets and public realm	0	+	0	0	0	++	++	+	++	0	+	0	0
10 Incorporate protection from adverse weather in the design of streets and the public realm	0	++	0	0	0	0	++	+	+	0	+	0	0
Outcome: Street space is used more efficiently and effectively													
11 Take a proactive approach to reducing motor traffic	+/-?	+	0	+	++	++	++	+	0	0	++	0	0
12. Design and manage the street network in accordance with the City of London street hierarchy	+	++	+	+	++	+	+	+	0	+	+	0	++
13 Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and	+	++	+	+	0	+	+	+	0	++	++	0	+

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
spend time													
14 Make the best and most efficient use of the kerbside and car parks	+	++	0	0	+	+	+	+	0	+	++	0	+
15 Support and champion the 'Turning the Corner' Campaign	0	+	0	0	0	+	+	0	0	0	++	0	+
Outcome: The Square Mile is accessible to all													
16 Develop and apply the City of London Street Accessibility Standard	0	++	+	0	0	0	0	+	0	++	++	0	++
17 Keep pavements free of obstructions	0	++	0	+	0	0	0	+	0	0	++	0	0
18 Keep pedestrian crossings clear of vehicles	0	+	0	0	0	0	0	0	0	0	+	0	0
19 Support and champion accessibility improvement to underground stations	0	0	0	0	0	0	0	0	0	+	+	0	++
Outcome: People using our streets and public spaces are safe and feel safe													
20 Apply the safe system approach and the principals of road danger reduction to	0	+	+	0	+	0	0	0	0	0	++	0	+

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
deliver Vision Zero													
21 Work with the City of London Police to reduce crime and fear of crime	+	+	++	0	0	0	0	0	0	+	+	0	++
22 Ensure on-street security measures are proportionate and enhance the experience of spending time on our streets	0	+	++	0	0	+?	+?	+	+	+	+	0	++
23 Improve the quality and functionality of street lighting	0	++	++	0	0	0	0	+	0	0	++	0	++
Outcome: More people choose to cycle in the City													
24 Apply a minimum cycling level of service to all streets	+?	+	0	0	+	++	++	+	0	+	++	0	+
25 Increase the amount of cycle parking in the City	+?	+	0	0	0	+	+	0	0	+	++	0	+
26 Ensure new developments contribute to improving the experience of cycling in the City	+?	+	0	0	0	++	++	0	0	+	++	0	+

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
27 Promote and celebrate cycling	0	+	0	0	0	++	++	0	0	0	++	0	+
28 Improve cycle hire in the City	+?	+	0	0	0	++	+	0	0	+	++	0	+
Outcome: The Square Mile's air and streets are cleaner and quieter													
29 Support and champion a central London Zero Emission Zone	+/-?	+	0	0	+	++	++	0	0	0	++	0	0
30 Install additional electric vehicle charging infrastructure	0	0	0	0	0	++	++	0	0	0	+	0	0
31 Request an accelerated roll out of zero emission capable buses	0	+	0	0	0	++	++	0	0	0	+	0	0
32 Support small businesses to accelerate the transition to zero emission capable vehicles	+	0	0	0	0	+	+	0	0	0	+	0	0
33 Make the City of London's own vehicle fleet zero emissions	0	+	0	0	0	++	++	0	0	0	++	0	0
34 Reduce the level of noise from motor vehicles	0	+	0	+	0	++	0	+	0	0	++	0	0

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
35 Reduce noise from streetworks	0	+	0	+	0	++	0	+	0	0	++	0	0
36 Encourage innovation in air quality improvements and noise reduction	+	+	0	+	0	++	++	+	0	0	++	0	0
37 Ensure street cleansing regimes support the provision of a world-class public realm	0	++	0	+	+++?	++	0	++	0	+	+	0	0
Outcome: Delivery and servicing needs are met more efficiently and impacts are minimised													
38 Reduce the number of freight vehicles in the Square Mile	+?	+	0	+	++	++	++	0	0	0	++	0	0
39 Develop a sustainable servicing programme	0	+	0	+	+	++	++	0	0	0	++	0	0
Outcome: Our street network is resilient to changing circumstances													
40 Allow some Local Access streets to function as City Access streets during significant disruption	+	+	0	+	0	+	+	0	0	0	0	0	0
41 Reduce the impact of construction and	0	+	0	0	0	0	0	+	0	0	+	0	+

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
streetworks													
42 Make the street network resilient to severe weather events	+	0	0	+	0	+	++	+	+	0	+	0	+
Outcome: Emerging transport technologies benefit the Square Mile													
43 Establish a Future Transport Programme	+	++	++	+	0	++	++	++	0	0	++	0	++
44. Establish a Future Transport Advisory Board	+?	+?	+?	+?	0	+?	+?	+?	0	0	+?	0	+?
45 Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile	0	+	0	0	0	0	0	0	0	0	+	0	+
Outcome: The Square Mile benefits from better transport connections													
46. Support and champion better national and international connections to the Square Mile	++	0	0	?	0	+/-	+/-	0	-?	0	0	0	++
47 Support and champion improved connections to the Square Mile from	++	+	0	?	0	++	++	0	-?	0	++	0	++

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
Greater London and the surrounding region													
48 Support the increased use of the Thames for passenger services	0	++	0	0	0	+	+	0	0	0	+	0	0
49 Review bus provision across the City	+	+?	0	0	0	+	+	0	0	0	+	0	++
50 Support the Mayor of London in retaining locally-generated taxation	+	+?	0	0	0	+?	+?	0	0	0	+?	0	+?
51 Encourage continued central government investment in major London transport projects	+	0	0	0	0	+	+	0	-?	0	+	0	++

Economic growth

- 4.6 The proposals within the Transport Strategy are expected to have mainly minor positive or negligible effects on economic growth. Significant positive effects are expected as a result of proposals 46 and 47 because they will help to improve regional, national and international connections to the City, making it a more attractive place for businesses to locate and a more accessible place for people to work and visit. Uncertain mixed effects are possible for this IIA objective, in relation to proposals 2, 11 and 29 as it is considered possible that some businesses may be put off locating in the City if access for vehicles is restricted, while on the other hand the restrictions will make the City a more healthy and attractive place to work and will improve driving for those vehicles still permitted access. Overall, the Strategy is expected to have positive effects in relation to the economic growth IIA objective.
- 4.7 These positive effects on the economy that will result from the Transport Strategy are likely to combine with the draft London Plan to create a more significant positive effect on the economy of the City.

Built environment and the public realm

- 4.8 The proposals within the Transport Strategy are considered likely to result in a mix of minor positive and significant positive effects on the built environment and public realm. This is generally because the Strategy will work to enhance the public realm, making it more attractive and accessible. Therefore, cumulatively, all of the proposals within the Strategy are expected to have positive effects on the built environment and public realm IIA objective.
- 4.9 The positive effects that the Strategy is likely to have in relation to the built environment and public realm, will be made more significant through strategic options and emerging policies in the draft London Plan.

Safe environment and crime reduction

- 4.10 Mainly negligible and minor positive effects are expected on the safe environment and crime reduction objective as a result of the proposals within the Transport Strategy, although a number of significant positive effects are considered likely as a result of proposals that include measures to reduce crime and improve safety on the City's streets. Overall, the Strategy is expected to have positive effects on the safe environment and crime reduction IIA objective.
- 4.11 The positive effects in relation to a safe environment and crime reduction as a result of the Transport Strategy are likely to be increased by strategic options and policies in the draft London Plan.

Heritage assets

- 4.12 The impacts of the Transport Strategy on heritage within the City are expected to be mainly negligible and minor positive. However, significant positive effects are expected to result from proposal 7 as it aims to enhance the settings of significant heritage assets. Uncertain effects are expected from proposals 46 and 47 as the effects of high level schemes on heritage assets are unknown at this stage. However, it is considered that they may present the opportunity to enhance assets. Overall therefore, the Strategy is expected to have positive effects in relation to the heritage assets IIA objective.
- 4.13 The positive effects in relation to heritage in the City which will arise as a result of the Transport Strategy will be further increased by emerging policy in the draft London Plan.

Waste management

- 4.14 A mixture of negligible and minor positive effects is expected to result from the Transport Strategy in relation to the waste objective. Four proposals are likely to have significant positive effects: 11, 12, 37 and 38. This is because these proposals will result in a reduction in the number of servicing vehicles and more sustainable waste collection. Therefore, the Strategy is expected to have positive effects in relation to the waste IIA objective.
- 4.15 Positive impacts in relation to the waste objective that will arise from the implementation of the Transport Strategy are likely to be supported and further strengthened by emerging policies in the draft London Plan.

Environmental protection

- 4.16 The majority of proposals within the Transport Strategy are expected to have significant positive, minor positive or negligible effects in relation to the environmental protection objective. These positive effects are generally because many of the proposals promote a reduction in road traffic, which will reduce air and noise pollution in the City. Overall the Strategy is likely to have a positive impact in relation to the environmental protection IIA objective.
- 4.17 The positive effects of the Transport Strategy in relation to the environmental protection objective are expected to be supported and enhanced by strategic options and policies in the draft London Plan.

Climate change mitigation and resilience

- 4.18 The Transport Strategy is likely to have a mixture of significant positive, minor positive and negligible effects in relation to the climate change mitigation and resilience objective. Similarly to environmental protection, this is mainly due to the emphasis on reducing road traffic and congestion in the City and a modal shift to walking and cycling, which will result in a reduction in transport emissions. A number of the proposals also promote urban greening, and require the City to be resilient to severe weather events. Overall therefore the Strategy is likely to have positive effects in relation to the IIA objective.
- 4.19 Positive impacts in relation to the climate change and mitigation objective from the Transport Strategy will be increased by strategic options and emerging policies included within the draft London Plan.

Open spaces

- 4.20 Mainly negligible and minor positive effects are expected in relation to the open spaces objective as result of the Transport Strategy, although significant positive effects are expected as a result of a number of proposals. This is because these proposals promote the enhancement of open space, or a reduction in traffic which will improve the tranquillity of open space. Positive effects therefore are expected overall as a result of the Transport Strategy.
- 4.21 The positive impacts on open spaces resulting from the implementation of the Transport Strategy are likely to be further improved through a number of strategic options and emerging policies in the draft London Plan.

Biodiversity and urban greening

- 4.22 The proposals within the Transport Strategy are anticipated to have mainly negligible effects on biodiversity and urban greening, although some minor positive effects are expected and significant positive effects are considered likely as a result of proposals 8 and 9 as these proposals

promote additional greenery in the City. Uncertain minor negative effects are considered possible as a result of proposals 46, 47, and 51 because of the impacts major transport infrastructure projects, such as new stations and station and rail expansions are likely to have some impact on habitats in, or around the City. However, this is uncertain because the specifics of the projects are unknown. Overall therefore it is expected that the effect of the Transport Strategy in relation to this objective will be mainly positive.

- 4.23 The draft London Plan will improve on the positive effects that the Transport Strategy is anticipated to have in relation to this IIA objective.

Social and cultural facilities

- 4.24 The Transport Strategy is expected to have a mixture of negligible and minor positive effects in relation to the social and cultural facilities objective, although significant positive effects are considered likely as a result of proposals 3, 13 and 16 through the provision of accessible streets, improved leisure facilities and the promotion of lunchtime streets events. Therefore, the impact of the Strategy in relation to the social and cultural facilities objective will be positive.
- 4.25 The positive impacts in relation to the social and cultural facilities objective that are expected to arise as a result of the implementation of the Transport Strategy will be further enhanced through a number of strategic options and policies in the draft London Plan.

Health

- 4.26 The impact of the Transport Strategy in relation to the health objective is anticipated to be a mixture of minor positive and significant positive effects. This is mainly due to the proposals which reduce road traffic thus improving air pollution, noise pollution and road safety. Overall the Strategy will have a positive effect on the health of the City's residents and visitors.
- 4.27 The positive impact that the Transport Strategy is anticipated to have on the health of the City's residents and visitors is expected to be further enhanced by strategic options and emerging policies in the draft new London Plan.

Education

- 4.28 The Transport Strategy is anticipated to have a negligible effect in relation to the education objective as this is unlikely to be affected by the implementation of the outcomes and proposals within the Strategy.
- 4.29 While the Transport Strategy is anticipated to have a negligible effect on education, the London Plan is expected to have positive effects and therefore cumulatively the Strategy and draft London Plan are likely to have positive effects.

Equality and inclusion

- 4.30 The proposals within the Transport Strategy are anticipated to have a mixture of negligible, minor positive and significant positive effects in relation to the equality and inclusion objective. Significant positive effects are considered likely as a number of proposals aim to make the streets in the City and public transport more accessible to all. Therefore, overall the Strategy will have positive effects in relation to the equality and inclusion IIA objective.
- 4.31 The positive effects arising from the Transport Strategy in relation to the equality and inclusion objective are expected to be further improved by the draft London Plan.

Reasonable alternatives

- 4.32 The City Corporation identified an alternative to proposal 9. The alternative being for all transport and public realm schemes to incorporate Sustainable Drainage Systems, aiming for a green field site run-off rate. However, the Corporation has stated that the reason that this alternative proposal was not selected is due to severe space constraints on and below the City's streets, meaning that it is nearly always impossible to install Sustainable Drainage infrastructure on streets in the City, making the proposal unlikely to be deliverable. For this reason, this option is not considered to be a reasonable alternative for the purposes of the IIA and has not been assessed.
- 4.33 An alternative was also considered to proposal 10 and was for the City's streets and public realm to be designed to provide protection from all weather. The Corporation stated that the reason that this alternative proposal was not selected is because providing protection from all weather is possibly unattainable. Therefore, as above, this is not considered to be a reasonable alternative option and has not been assessed.
- 4.34 A reasonable alternative to proposal 16 has been considered by the City Corporation. The reasonable alternative is to 'continue with minimum accessibility standards as per the Design Manual for Roads and Bridges (DMRB)'. This will only have negligible effects on the IIA objectives, as it is a continuation of the current approach. Therefore, the selected proposal 16 is more likely to have positive effects.
- 4.35 A reasonable alternative has also been identified to proposal 20. It is considered that an alternative method of reducing road danger is a traditional road safety approach. Rather than aiming to remove the danger on roads, it seeks to mitigate it, for example by increasing segregation between vehicles and pedestrians with guard railing. This is expected to have mainly negligible effects on the IIA objectives. Significant positive effects are considered likely in relation to health through the mitigation of road danger. However, the alternative option to proposal 20 is anticipated to have fewer positive effects than the selected proposal.
- 4.36 The alternative considered to proposal 22 is to continue with the use of bollards for all hostile vehicle mitigation (HVM). The alternative to proposal 22 is a continuation of the current measure, therefore it will have negligible effects on the IIA objectives. The selected proposal is anticipated to have a number of positive effects.
- 4.37 Reasonable alternatives have also been identified to proposals 29, 30 and 36. For proposal 29 it is considered that an alternative to championing a central London Zero Emission Zone would be to ban all motor vehicles. An alternative to selected proposal 30 would be to rely on the private installation of EV charge points, while the alternative to selected proposal 36 would be to allow the market to lead in air quality improvements and noise reduction, rather than this being encouraged by the City.
- 4.38 The alternative to proposal 29 is anticipated to have a range of effects. The impact on the built environment and public realm; safe environment and crime reduction; heritage assets; and open space is expected to be more beneficial than the selected option. However, the impact on waste management, social and cultural facilities and equality and inclusion is expected to be more adverse. A significant negative effect is considered likely in regards to waste management as a total ban on vehicles in the City would not allow for appropriate and convenient deliveries and servicing. As highlighted in **Appendix 4** of the main IIA report, this is the main reason why this reasonable alternative has not been selected.
- 4.39 The alternatives to proposals 30 and 36 are a continuation of the current situation and therefore will have negligible effects on the IIA objectives. The selected proposals are anticipated to have a number of positive effects.

5 Conclusions and monitoring

Conclusions

- 5.1 The selected proposals and reasonable alternatives for the City of London Transport Strategy have been subject to a detailed appraisal against the IIA objectives, which were developed at the scoping stage of the IIA process.
- 5.2 The IIA has identified the potential for significant effects (positive) for proposals under all of the outcomes contained within the Transport Strategy. The scores are set out in **Table 4.1**. No significant negative effects have been identified as a result of the proposals in the Transport Strategy.
- 5.3 Cumulatively all of the proposals within the Transport Strategy are expected to have positive effects on the baseline in relation to achievement of all of the IIA objectives apart from education for which negligible effects are anticipated. These positive effects are, for the majority of IIA objectives, expected to be enhanced when the Strategy is considered in combination with the draft London Plan.
- 5.4 The IIA has been undertaken alongside the preparation of the Transport Strategy and therefore has been able to feed into the proposals and ensure that sustainability considerations are integrated within the Strategy.

Monitoring proposals

- 5.5 Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision making.
- 5.6 Monitoring should be focussed on the significant environmental effects of a plan or programme and so based on this, monitoring indicators have been proposed for effects on all of the IIA objectives apart from education; this is not included as it is unlikely to be significantly affected by the implementation of the Transport Strategy. It is noted that no significant negative effects are considered likely as a result of the plan and so the monitoring is based on significant positive effects, with the aim of validating that these effects do indeed arise when the Transport Strategy is implemented.
- 5.7 **Table 5.1** sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Transport Strategy. Indicators are proposed in relation to the IIA objectives for which potential significant positive effects were identified as a result of any of the proposals.
- 5.8 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations can also be used as a source of indicators. It is therefore recommended that that City of London continues the dialogue with the statutory consultees and other stakeholders described in the Transport Strategy, and works with them to agree the relevant environmental effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 5.1 Proposed monitoring framework for the Transport Strategy

IIA objectives	Proposed monitoring indicators
Economic growth	<ul style="list-style-type: none"> New business registration rate Overall change in employment floorspace Commuting numbers / statistics to the City Number of international businesses located in the City
Built environment and public realm	<ul style="list-style-type: none"> Number of people walking or cycling Public perception of public realm in the City Amount of street clutter and cleanliness of the streets Passenger numbers using river transport
Safe environment and crime reduction	<ul style="list-style-type: none"> Number of reported crimes
Heritage assets	<ul style="list-style-type: none"> Quality and usage of the Barbican high walks Number of visits to heritage assets in the City, in particular the Barbican Applications refused due to impact on the historic environment Number of heritage assets at risk
Waste management	<ul style="list-style-type: none"> Percentage and delivery and servicing trips made by zero emission transport The number of large delivery and servicing vehicles using the transport network
Environmental protection	<ul style="list-style-type: none"> Changes in the concentration of air pollutants in the City Number of planning applications that include an air quality assessment¹⁷ Number of complaints regarding noise

¹⁷ Air quality assessment should demonstrate how the development has met air quality challenges thereby avoiding refusal.

IIA objectives	Proposed monitoring indicators
	Changes in water quality at the River Thames SINC
Climate change mitigation and resilience	<p>The number of vehicles that meet the Zero Emissions Zone standards</p> <p>The percentage of Zero Emission Capable buses on the network</p> <p>The modal shift from private car use to walking, cycling or public transport</p> <p>Changes in greenhouse gas emissions from the City</p> <p>Net increase in Green Infrastructure</p>
Open spaces	<p>Open space / parks usage</p> <p>Amount of public open space as percentage of total land use</p>
Biodiversity and urban greening	<p>Net increase in Green Infrastructure, parks and open spaces</p> <p>Number of sites designated for nature conservation and their quality</p> <p>Changes in areas of biodiversity importance</p>
Social and cultural facilities	<p>Adults participating in sports, recreation and cultural activities</p> <p>Number of 'lunchtime streets' events taking place</p>
Health	<p>Number of hospital admissions in relation to road accidents</p> <p>Number of accidents involving cyclists and pedestrians</p> <p>Number of complaints regarding amenity (e.g. in relation to noise)</p> <p>Proportion of residents reporting their health as 'good' or 'very good' (source: Census)</p>
Equality and inclusion	<p>Number of new or extended bus services</p> <p>Number of step free rail stations</p> <p>Public transport usage by the elderly or disabled</p>