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# **City of London Freight and Servicing SPD**

## **Strategic Environmental Assessment: Non-Technical Summary**

Prepared by LUC  
July 2017

**Project Title:** Strategic Environmental Assessment of the City of London Freight and Servicing SPD

**Client:** The City of London

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## Introduction

- 1.1 This Non-Technical Summary relates to the Strategic Environmental Assessment Report<sup>1</sup> for the draft City of London Freight and Servicing Supplementary Planning Document (SPD). The SPD is being produced by the City of London Corporation ('City Corporation') and will set out the City Corporation's requirements for new development in relation to the management of freight and servicing. The SPD is intended to be read in conjunction with the Standard Highway and Servicing Requirements for Development in the City of London, the Code of Practice for Deconstruction and Construction Sites (published by the City Corporation) and the Construction Logistics Plan Guidance (published by Transport for London).
- 1.2 Strategic Environmental Assessment (SEA) is a process that assesses the likely effects of the SPD on environmental issues. This is required for a range of plans and strategies, including SPD's that may have significant environmental effects. A Screening Report<sup>2</sup> was prepared by LUC in May 2017, which determined that the SPD may have significant effects on the environment, therefore SEA is required. The City of London Corporation has commissioned independent consultants (LUC) to carry out the Strategic Environmental Assessment of the SPD on its behalf. The Strategic Environmental Assessment (SEA) Report and this Non-Technical Summary incorporate all of the work undertaken by LUC.
- 1.3 This Non-Technical Summary relates to the full Strategic Environmental Assessment Report for the draft version of the Freight and Servicing SPD.

## The City of London Freight and Servicing SPD

- 1.4 Despite the small footprint of the City of London, the large working population generates significant demand for physical goods and services. The working population of the City is forecast to grow to 475,000, and the residential population to 10,250 by 2036, so the need to manage the effects of the increasing demand for space on the transport network continues to grow. The efficient movement of goods and provision of services are fundamental requirements for a successful city.
- 1.5 The City of London Freight and Servicing SPD will set out the City Corporation's requirements for new development in relation to the management of freight and servicing. The document will set out;
  - The background to, and definition of freight and servicing and factors that drive the need to manage freight and servicing including; traffic, road danger reduction, air quality and carbon emissions
  - The policy context, including key local, national and international policy and also including existing and planned schemes and projects
  - The vision for the management of freight and servicing in the City – *'reduce the number of freight and delivery vehicles and their environmental impact on the City's streets, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City's boundaries.'* The SPD will help to achieve the vision by setting out guidance for new development that will limit the impact of new and additional freight demand on the City and beyond
  - The aims of the SPD – *'to minimise freight and servicing trips, to match demand to network capacity and to mitigate the impact of freight trips'*
  - Guidelines, actions and measures for achieving the above aims
  - Measures for each type of development including; office, multi-tenanted buildings, general retail, food and drink, hotels and hospitality, and residential

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<sup>1</sup> This is referred to as the full Strategic Environmental Assessment Report (SEA).

<sup>2</sup> Screening is the process of determining whether a plan is likely to give rise to significant environmental effects, SEA is only required if significant effects are likely.

- The need and requirement for construction logistics plans
- 1.6 The SPD will also include guidance on the use of night time servicing as well as measures that encourage the use of consolidation centres, which are may be located outside of the City.

## Strategic Environmental Assessment

- 1.7 Strategic Environmental Assessment (SEA) is a statutory assessment process, required under the SEA Directive<sup>3</sup>, which was transposed into UK law 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. A screening exercise was undertaken in February 2017<sup>4</sup>. This concluded that the SPD could give rise to significant environmental effects and therefore it was screened into the SEA process. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.8 SEA must be carried out in accordance with Government guidance<sup>5</sup> and must meet the requirements of the European Strategic Environmental Assessment Directive<sup>6</sup>.
- 1.9 **Table 1** below signposts how the requirements of the SEA Regulations have been met within the SEA work undertaken to date (presented in the full SEA Report and this Non-Technical Summary).

**Table 1 Requirements of the SEA Regulations and where these have been addressed**

SEA Regulations Requirements	Where covered in this SEA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 3 and Appendix 2 of the main SEA report and summarised in this NTS.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 3 of the main SEA report and summarised in this NTS.

<sup>3</sup> SEA Directive 2001/42/EC

<sup>4</sup> City of London Freight and Servicing SPD Screening Statement, February 2017

<sup>5</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>6</sup> European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

SEA Regulations Requirements	Where covered in this SEA report
e) The environmental protection, objectives, established at international, community or national levels, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix 2 of the main SEA report and summarised in this NTS.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors <sup>7</sup> .	Chapter 4 of the main SEA report and summarised in this NTS.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 4 of the main SEA report and summarised in this NTS.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 4 of the main SEA report and summarised in this NTS.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 5 of the main SEA report and summarised in this NTS.
j) a non-technical summary of the information provided under the above headings	Addressed through this NTS.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout the SEA report and this NTS.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	Consultation on the SEA Scoping Report for the draft SPD was undertaken between the 23 <sup>rd</sup> and the 28 <sup>th</sup> of June 2017. The consultee responses and our responses are included in Appendix 1 of the SEA report.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4))</li> </ul>	Consultation is being undertaken in relation to the draft SPD between 7 <sup>th</sup> August and 30 <sup>th</sup> September 2017.
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	N/A

<sup>7</sup> These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

SEA Regulations Requirements	Where covered in this SEA report
<b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Regs.13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Reg. 16(4)(f))</li> </ul>	To be addressed after the SPD is adopted.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	To be addressed after the SPD is adopted.
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	The SEA report and this NTS have been produced in line with current guidance and good practice for SEA and this table demonstrates where the requirements of the SEA Regulations have been met.

1.10 The approach taken to the SEA of the Freight and Servicing SPD is based on current best practice and the guidance on SEA, which involves carrying out SEA as an integral part of the planning process.

1.11 The Screening Statement screened the SPD into the SEA process on the basis that it is likely to have significant effects on the environment. This is due to the fact that the SPD proposes actions and land use for consolidation centres outside the City without identifying specific locations, and proposes out of hours servicing without evaluating the impacts of such servicing beyond the City's boundaries. Identified effects relate primarily to increases in carbon emissions and air pollutants, but also include amenity issues such as noise pollution and increased traffic.

### Stage A: Scoping

1.12 The SEA process began in June 2017 with the production of a Scoping Report for the Freight and Servicing SPD, which was prepared by LUC on behalf of the City of London Corporation. During the Scoping stage of the SEA, the work that had previously been carried out during the Sustainability Appraisal of the City of London Local Plan was drawn on as appropriate, as some of that work is applicable to this SEA.

1.13 The scoping stage of the SEA involves collating information about the environmental baseline for the SPD area and the key environmental issues facing it, as well as information about the policy context for the preparation of the SPD. The SEA Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Freight and Servicing SPD were identified and the relationships between them were considered.
- Baseline information was collected on the following topics, as required by the SEA Regulations<sup>8</sup>: biodiversity (including flora and fauna), population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. This baseline information provides the basis for predicting and monitoring the

<sup>8</sup> Listed in Schedule 2 of the SEA Regulations

likely effects of the SPD 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 SPD were not to be implemented. If, drawing on the baseline information and relevant plans, policies and programmes it was considered that the SPD was unlikely to have significant effects upon certain topics (listed above), they were scoped out from further consideration in the SEA.
- An SEA 'framework' was then presented, against which options were appraised. The SEA framework provides a way in which the environmental impacts of implementing a plan and reasonable alternatives (i.e. options) can be described, analysed and compared. The SEA framework comprises a series of environmental objectives and associated questions that can be used to 'interrogate' options during the plan-making process. These SEA objectives define the long-term aspirations of the City with regard to environmental issues. During the SEA, the performance of each option for the SPD was assessed against these SEA objectives and questions.

1.14 The most recent versions of the policy review and baseline information can be found in Appendices 2 and 3 of the SEA report.

1.15 Public and stakeholder participation is an important element of the SEA and wider plan-making processes. It helps to ensure that the SEA report is robust and has due regard for all appropriate information that will support the SPD in making a contribution to sustainable development. The SEA Scoping Report for the Freight and Servicing SPD was published in June 2017 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate in the SEA. Appendix 1 of the SEA report lists the comments that were received during the scoping consultation and describes how each one was addressed.

1.16 Table 2 presents the five SEA objectives in the City of London SEA framework and shows how the topics (see above) that were scoped in to the assessment have been covered by these. Only those issues that were scoped in to the SEA have been included in the below table. Those issues that were scoped out are not expected to be influenced by the SPD and therefore have not been considered further. Those issues that have been scoped out are:

- Landscape
- Biodiversity, Flora and Fauna
- Water
- Soils

**Table 2 SEA framework for the City of London Freight and Servicing SPD**

SEA Objectives	Appraisal Question	Topic(s) covered
SEA 1 Improve air quality	<ul style="list-style-type: none"> <li>• Reduce the number of vehicles on the City's roads</li> <li>• Reduce congestion on the City's roads</li> </ul>	Air Quality
SEA 2 Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>• Reduce carbon emissions through minimising traffic movements in the City</li> <li>• Utilise low or zero carbon transport where possible</li> </ul>	Climate Change
SEA 3 Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>• Reduce the amount of waste requiring removal through reuse and recycling</li> <li>• Reduce the number of waste collection trips</li> </ul>	Material Assets

SEA Objectives	Appraisal Question	Topic(s) covered
SEA 4 Improve the health of City workers, residents and visitors	<ul style="list-style-type: none"> <li>• Improve safety for pedestrians and cyclists</li> <li>• Improve air quality (see SEA objective 1)<sup>9</sup></li> <li>• Reduce noise and light pollution</li> </ul>	Population Human Health
SEA 5 Conserve and enhance the historic environment	<ul style="list-style-type: none"> <li>• Maintain the character and setting of heritage assets in the City</li> </ul>	Cultural heritage

### SEA Stage B: Developing and refining options and assessing effects

- 1.17 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 SEA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Freight and Servicing SPD, options include different measures for reducing the impact of freight and servicing on the City.
- 1.18 Regulation 12 (2) of the SEA Regulations requires that:
- 1.19 *'The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*
- 1.20 *(a) implementing the plan or programme; and*
- 1.21 *(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.'*
- 1.22 It should be noted that any alternatives considered need to be 'reasonable'. This implies that alternatives that are 'not reasonable' do not need to be subject to appraisal. Examples of unreasonable alternatives could include options that do not meet the objectives of the plan or that do not comply with national policy (e.g. the National Planning Policy Framework).
- 1.23 It also needs to be recognised that the SEA findings are not the only factors taken into account when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on environmental performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

#### *Identification and appraisal of options*

- 1.24 Reasonable alternative options for the SPD were identified by the City of London Corporation and were drawn from the most up-to-date evidence, and the current operational procedures and best practice for freight and servicing in the City.
- 1.25 The alternative options that were considered include; retaining business as usual, which would continue to carry out freight and servicing in line with policies set out in the Local Plan, and other specific measures that would work to reduce the environmental impact of freight and servicing.

### SEA Stage C: Preparing the Strategic Environmental Assessment Report

- 1.26 The SEA report describes the process that has been undertaken to date in carrying out the SEA of the Freight and Servicing SPD. It sets out the findings of the appraisal of options and measures set out in the SPD highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant).

### SEA Stage D: Consultation on the Freight and Servicing SPD and the SEA Report

- 1.27 The City of London is inviting comments on the draft Freight and Servicing SPD and the SEA Report. The SEA Report is being published on the City of London Corporation's website for consultation between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.

<sup>9</sup> 'Elevated levels and / or long term exposure to air pollution can lead to serious symptoms and conditions affecting human health. This mainly affects the respiratory and inflammatory systems but can also lead to more serious conditions such as heart disease and cancer.' <https://uk-air.defra.gov.uk/air-pollution/effects>.

## SEA Stage E: Monitoring implementation of the SPD

- 1.28 Monitoring of environmental effects identified should be carried out after adoption of the SPD, therefore recommendations for monitoring the likely significant environmental effects of implementing the SPD are presented in Chapter 5 of the SEA report.

## Environmental context

### Review of Plans, Policies and Programmes

- 1.29 The Freight and Servicing SPD is not prepared in isolation, being influenced by other plans, policies and programmes and by broader environmental objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies. The SPD must also conform to environmental protection legislation and contribute to achieving the environmental objectives established at the international and national levels.
- 1.30 A review has been undertaken of the other plans, policies and programmes that are relevant to the Freight and Servicing SPD.
- 1.31 Schedule 2 of the SEA Regulations requires:
- 1.32 *(1) 'an outline of the...relationship with other relevant plans or programmes'; and*
- 1.33 *(5) 'the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation'*

#### *Key international plans, policies and programmes*

- 1.34 At the international level, 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 SPD in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 1.35 Also at the international level is the Air Quality Directive<sup>10</sup>, on ambient air quality and cleaner air for Europe. The objective of this directive is to avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.
- 1.36 There are a wide range of other EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been included in Appendix 2 of the full SEA Report for completeness.

#### *Key national plans, policies and programmes*

- 1.37 There is a wide range of national level plans, policies and programmes with relevant objectives for the SEA, which are summarised in Appendix 2 of the SEA. However, the most significant policy context for the SPD is the National Planning Policy Framework (NPPF) and the online Planning Practice Guidance (PPG)<sup>11</sup>. The City of London Freight and Servicing SPD must be consistent with the requirements of the National Planning Policy Framework, which sets out information about reductions in emissions and congestion and the use of sustainable transport modes. It states that:
- 1.38 *'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (NPPF, para 30)'*
- 1.39 *'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... .. accommodate the efficient delivery of goods and supplies (NPPF, para 35)'*

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<sup>10</sup> 2008/50/EC

<sup>11</sup> <http://planningguidance.planningportal.gov.uk/>

### *Local plans, policies and programmes*

- 1.40 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to the City of London and Greater London, which provide further context for the Freight and Servicing SPD. The main documents of relevance to the SPD are summarised below. All other relevant local plans, policies and programmes are included in Section 3 of the main SEA report.

#### *City of London Local Plan*

- 1.41 The City of London Local Plan is the statutory planning document for the City. A number of the Local Plan policies are applicable to the Freight and Servicing SPD; the SPD must be in general conformity with the Local Plan.

#### *London Plan*

- 1.42 The London Plan is the strategic planning document for the 32 London boroughs and the City of London. It sets out the framework for development in London and the policy context for local planning policies. The London Plan is currently under review by the Mayor of London however, until this is complete the most recent version from March 2016 remains in place.

#### *The Mayor's Transport Strategy*

- 1.43 The Mayor's Transport Strategy sets out the Mayor's Transport Policy. As with the London Plan, the current strategy dates from a previous Mayoral Administration. Although a new MTS is currently in draft format, the previous strategy remains in place until the new document is formally adopted.
- 1.44 The existing MTS sets out policies to promote the use of river and rail for freight movements through safeguarding existing wharves and promoting rail freight infrastructure.
- 1.45 The MTS also addresses the safety implications of freight movements, promoting schemes such as the Fleet Operator Recognition Scheme (FORS) and improvements to vehicle and driver safety. The document also supports efficiencies through consolidation and out of hours delivery and servicing where possible, supported by quiet delivery schemes and Delivery and Servicing Plans.
- 1.46 The new Mayor's Transport Strategy draft for consultation was published in June 2017. Although this is a draft document and subject to change, the document gives a strong indication of the Mayor's transport priorities for his term of office. The draft strategy proposes a 10 per cent reduction in central London lorry and van use by 2026. In particular there is a focus on the use of consolidation centres for construction and other sectors.

### **Baseline Information**

- 1.47 Baseline information provides the context for assessing the sustainability of proposals in the Freight and Servicing SPD and it provides the basis for identifying trends, predicting the likely effects of the SPD and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 1.48 The SEA Regulations require data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape. The baseline information for the City of London, which was originally presented in the Scoping Report, is set out in Appendix 3 in the main SEA Report and some of the key information is summarised below.

#### *Summary of baseline information*

##### **Climatic Factors**

- 1.49 Energy consumption and the consequent emissions of carbon dioxide are of significant importance to the City of London and have a contributory impact on climate change. Petroleum products, though not the largest source of energy consumed in the City or London as a whole, contribute a large amount to energy consumption. Much of this is as a result of motorised transport, including delivery and servicing vehicles. **The effects of the SPD on climatic factors were scoped into**

**the SEA** as emissions of Carbon Dioxide and other Greenhouse gases have the potential to be affected by the measures set out in the Freight and Servicing SPD.

### **Landscape**

- 1.50 The City of London and its environs contain many famous landmarks which are visible both within and beyond the City's boundaries. Views of the City's skyline from the River Thames are especially notable and certain local views of St Paul's Cathedral have been protected successfully by the City Corporation's St Paul's Heights code since the 1930's. Landmarks such as St Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's 'world class' status. These views are protected by an integrated range of national regional and local policies. **The effects on landscape were scoped out** of the SEA as it was not envisaged that the Freight and Servicing SPD will have any significant effects on the landscape character of the City. This is because the SPD will not propose specific sites for new development or infrastructure itself, rather its aim will be to limit the impact of additional freight and servicing trips that new development might attract.

### **Biodiversity, Flora and Fauna**

- 1.51 There are a number of locally and nationally important species in the City of London including; Black Redstart, Peregrine Falcon, House Sparrow, Bats, Stag Beetles, Swift and Bumblebee<sup>12</sup>. There are also a number of locally important habitats<sup>13</sup>, including 'parks and urban green spaces' with another important habitat identified as 'built structures'. A further habitat recognised as a London biodiversity target<sup>14</sup> within the City of London is the Tidal Thames, which is also the City's only Site of Metropolitan Importance for Nature Conservation. There are also ten sites which have been designated as Sites of Importance for Nature Conservation in the City. It is concluded that the SPD will not affect the priority habitats in the City. **Issues regarding biodiversity, flora and fauna were scoped out of the SEA.** As the SPD will not propose any specific sites for new development or infrastructure and instead will aim to reduce the impacts of freight and servicing that new development may give rise to, it was considered that the Freight and servicing SPD will not significantly affect priority species or habitats in the city.

### **Cultural Heritage**

- 1.52 The City of London, by virtue of its rich heritage and development, has a legacy of buildings of high architectural merit and areas of distinctive townscape quality and character. This includes 26 conservation areas and over 600 listed buildings and four historic parks and gardens at Finsbury Circus, Barbican and the Temples (Inner Temple and Middle Temple) and also includes the setting of a World Heritage Site – the Tower of London. There are also a number of scheduled ancient monuments and sites with Archaeological Potential present in the City, areas with archaeological remains in situ cover much of the area. **The effects of the SPD on cultural heritage were scoped in to the SEA** assessment as, due to the number of listed buildings and other heritage assets in the City there may be the potential for effects upon the settings of these assets.

### **Air Quality**

- 1.53 The major contributor to poor air quality in the City is motorised vehicles. Petrol and diesel engines emit a wide range of pollutants, principally Carbon Monoxide, Oxides of Nitrogen, volatile organic compounds and fine particulate matter. In 2001 the whole of the City was declared an Air Quality Management Area for Nitrogen Dioxide, and fine particulate matter. Exposure to fine particulate matter and Nitrogen Dioxide is considered to be a significant cause of ill health and premature death in London. Around 24% of fine particulate matter and 33% of Nitrogen Dioxide emissions associated with traffic in the City are from the movement of freight. For these reasons **air quality was scoped in to the SEA.**

### **Water**

- 1.54 The only natural bodies of water occurring in the City are the River Thames, and the ground waters that exist below the City. Environment Agency water quality data for the River Thames for 2012 shows the current ecological quality as 'moderate' for the City of London stretch of the

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<sup>12</sup> City of London Biodiversity Action Plan 2016 - 2020

<sup>13</sup> City of London Biodiversity Action Plan 2016 - 2020

<sup>14</sup> City of London Biodiversity Action Plan 2016 - 2020

Thames and the current chemical quality is shown as failing to meet the required standard<sup>15</sup>. **The effect of the SPD on water quality within the City was scoped out of the SEA** as it was not envisaged that any of the measures within the SPD will have a significant effect upon water quality in the area.

### Soils

- 1.55 The City of London Contaminated Land Strategy in 2001 states that there is no contaminated land in the City. The City Corporation continues to monitor potential land contamination associated with development sites and no evidence to conflict with this finding has emerged. **Effects on soils was scoped out of the SEA** as it was not expected that the measures contained within the Freight and Servicing SPD would have any significant effects on soil quality in the City. This is because the SPD will not proposed specific sites for new development, rather its aim will be to limit the impact of additional servicing and delivery for new developments.

### Population and Human Health

- 1.56 The majority of residents in the City of London rate their health as 'Very good' (56%) with 32% residents rating their health as 'Good' and less than 1% of residents rated their health as 'Very Bad'<sup>16</sup>. In general Health is reported to be better in the City than in Greater London<sup>17</sup>. In terms of road safety in the City large vehicles are disproportionately involved in collisions with vulnerable road users. **Effects on human health were scoped into the SEA.**

### Material Assets

- 1.57 Offices are the predominant land use in the City. Other main land uses are transport, open space, housing, retailing, utilities, public buildings, education and health. The City's transport infrastructure incorporates the streets, walkways and public realm, which enable pedestrian movement; the shared spaces, highways and cycle parking facilities, which enable safe and secure cycling; the highways, roads lanes and vehicle parking facilities, which accommodate motor vehicles, essential for servicing and the delivery and operation of buses, taxis and private vehicles; the underground tube systems and overground rail networks and stations, which provide public transport connections within and beyond the City nationally and internationally; and the river transport system for both freight and passenger transport to and from the City's wharf and piers.<sup>18</sup> There are two main categories of waste produced in the City - commercial and household. Municipal waste collected by the City of London Corporation is transported by river to the Riverside Resource Recovery Energy Waste Facility in Belvedere. The City of London also transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors. The high rate of development in the City means that large quantities of construction and demolition waste are generated. **The effects of the SPD on material assets, in particular waste, was scoped in to the SEA.** This is due to measures in the SPD that aim to reduce waste and waste collections.

### Key Environmental Issues

- 1.58 An up-to-date set of key environmental issues for the City of London was identified during the scoping stage of the SEA and was presented in the Scoping Report.
- 1.59 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 3** overleaf describes the likely evolution of each key environmental issue if the SPD were not to be adopted.

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<sup>15</sup> Environment Agency River Basin Management Plans Estuarine

<sup>16</sup> City of London Resident Population, Census 2011, Health

<sup>17</sup> ONS Neighbourhood Statistics, City of London, Health and Provision of Unpaid Care 2011

<sup>18</sup> City of London Infrastructure Delivery Plan, 2011

**Table 3: Key Environmental Issues for the City of London and likely evolution without implementation of the SPD**

Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD	Likely Evolution without the Freight and Servicing SPD
<b>Climatic Factors</b>	
<p>Carbon emissions and climate change are of significant importance to the City. Among other sources, motorised transport is a contributor to Carbon emissions in the City.</p>	<p>The City of London Local Plan includes the following policies to tackle a reduction in carbon emissions: CS15 – Sustainable Development and Climate Change; DM15.1 – Sustainability requirements; DM15.2 – Energy and CO2 emissions assessments; DM15.3 Low and zero carbon technologies; DM15.4 Offsetting of carbon emissions and DM15.5 Climate change resilience and adaptation.</p> <p>The implementation of the SPD offers opportunities to further tackle this issue through the reduction and consolidation of freight and servicing, although localised air quality issues may arise around the proposed consolidation centres. Without the implementation of the SPD 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 freight and servicing 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 Freight and Servicing SPD.</p>
<b>Cultural Heritage</b>	
<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. Changes in vehicle movements and development of consolidation centres may affect the settings and views of city landmarks and listed buildings and can affect archaeological remains.</p>	<p>The City of London Local Plan aims for thorough protection of its cultural assets through a large number of policies that will protect and enhance the City’s heritage and archaeological assets. These policies include: DM 11.1 – Protection of visitor, arts and cultural facilities; CS12 – Historic Environment; DM12.1 Managing change affecting all heritage assets and spaces; DM 12.2 Development in conservation areas; DM 12.3 Listed buildings; DM 12.4 Ancient monuments and archaeology and DM 12.5 Historic parks and gardens.</p> <p>The implementation of the SPD may add further protection to these assets through its aims and measures, such as the reduction in road traffic however, it may also adversely affect the setting of some heritage assets in the location of consolidation centres which are not yet known. If the SPD 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>

**Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD**

**Likely Evolution without the Freight and Servicing SPD**

**Air quality**

The City has some of the highest levels of 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 (NOx) remain high. For this reason the City of London is a designated Air Quality Management Area. Exposure to these pollutants is considered to be a significant cause of ill health.

Much of the air pollution in the City is associated with traffic and the movement of freight particularly, and so a reduction should be sought.

The City of London Local Plan sets out a policy to improve air quality in the City, Policy DM 15.6 – Air quality, as well as some of those policies set out in the climatic factors issue. There are also policies in the Local Plan which address traffic reductions and shift to more sustainable modes of transport. This includes policies CS16 – Public transport streets and walkways, DM 16.1 - Transport impacts of development, DM 16.4 – Facilities to encourage active travel, and DM 16.8 – River transport.

The implementation of the SPD offers an opportunity to further improve air quality in the City through the reduction in traffic and congestion. As stated in the climate impacts section air quality around the proposed consolidation centres may decline as a result and so this will need to be considered. Although it is considered that the issue of air quality is addressed in the Local Plan, the SPD would lend further measures and support to this and ensure that freight and surviving 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 Freight and Servicing SPD would lend further support to these policies in the reduction in traffic and congestion and a decrease in pollution. In the absence of the SPD the policies in the Local Plan will work towards this reduction with support from forthcoming GLA policies such as the Ultra Low Emissions Zone. The SPD will further support these measures.

**Population and human health**

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.

Policies relating to the health of the population are set out in the Local Plan and include those set out above in 'Air quality' to encourage and facilitate active travel and also: CS19 – Open spaces and recreation; DM 19.3 – Sport and recreation and CS22 – Social infrastructure and opportunities.

The SPD has the potential to further improve the health of City residents' through the reduction in road traffic, congestion and air pollution, ensuring that the City is an attractive, healthy environment for recreation and the noise associated with servicing is minimised. However, the adverse effects of night time and weekend deliveries will also need to be considered. Without the implementation of the SPD 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.

**Key Environmental Issues for the City of London of relevance to the Freight and Servicing SPD**

**Likely Evolution without the Freight and Servicing SPD**

**Material assets / waste**

The high rate of redevelopment in the City means that large quantities of demolition and construction waste are generated. The constricted nature of the City and the tight timescales involved in redevelopment mean that most of this demolition waste is transported off site for either recycling or disposal.

The Local Plan includes a number of policies for the reduction in demolition and construction waste and transport, these include: DM 17.1 - Provision for waste in development schemes; DM 17.2 - Designing out construction waste; DM 17.3 - New waste management sites and DM 17.4 Development affecting waste management sites.

Although the Local Plan includes policies aimed at reducing demolition and construction waste, the implementation of the Freight and Servicing SPD will further support the high rate of redevelopment and the sustainable movement of demolition and construction waste through improvements in efficiency and consolidation. The proposed use of consolidation centres outside of the City, and the possible increase in river traffic will also have to be considered. Without the measures in the SPD to reduce the transport impacts of waste, policies are still in place but it is considered that the SPD lends further support and weight to these, making outcomes more achievable.

The City of London transports waste for some local authorities and companies who operate their own waste management and recycling schemes using private contractors. Also, in addition to the Municipal waste management in the city a large number of private waste contractors operate in the City collecting waste from commercial premises. The Defra Commercial and Industrial Waste Survey 2009 estimates that the City generates 206,000 tonnes of commercial waste per annum. The City has no waste management sites so all waste has to be transported elsewhere.

There are policies in the local Plan that address the need to minimise waste and the transport of waste in the City, including CS17 – Waste; DM 17.3 - New waste management sites; DM 17.4 – Development affecting waste management sites and DM 17.1 Provision for waste in development schemes.

The SPD sets out measures for a reduction in the number of delivery and servicing vehicles including waste collection vehicles through improvements in efficiency, on site waste management measures and the use of consolidation centres. It therefore would aid in the reduction of and effective and efficient removal of waste. In the absence of the SPD it is considered that waste collection and removal may continue as it is at present with large numbers of servicing vehicles on the City's roads.

## Appraisal methodology

- 1.60 The reasonable alternative options and the selected options set out in the Supplementary Planning Document have been appraised against the five SEA objectives in the SEA framework (see **Table 2** earlier in this Non-Technical Summary), with scores being attributed to each option to indicate its likely environmental effects on each objective as shown in **Figure 1**.

**Figure 1 Key to symbols and colour coding used in the SEA of the Freight and Servicing SPD**

++	The option or policy is likely to have a <b>significant positive</b> effect on the SEA objective(s).
+	The option or policy is likely to have a <b>minor positive</b> effect on the SEA objective(s).
0	The option or policy is likely to have a <b>negligible or no</b> effect on the SEA objective(s).
-	The option or policy is likely to have a <b>minor negative</b> effect on the SEA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SEA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SEA objective(s), due to a lack of data.
+/-	The option or policy is likely to have a <b>mixture of positive and negative</b> effects on the SEA objective(s).

- 1.61 Note that where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 1.62 The likely effects of the options needed to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. 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 on the SEA objective in question is considered to be of such 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.

### Difficulties Encountered

- 1.63 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 1.64 The main difficulty encountered when assessing the Freight and Servicing SPD, was the uncertainty surrounding the measure setting out the use of out of town consolidation centres. The City Corporation have confirmed that private developers will need to identify potential suitable sites, ideally in Preferred Industrial Locations, choose to develop these, and make an application to the relevant planning authority, who will then have the final decision on whether the development is to be permitted. For this reason the City has little authority over the implementation of the consolidation centres. Because of this, very little is known about the locations of potential consolidation centres and how they may operate, and so uncertainty exists in the conclusions drawn regarding their effects.

## SEA findings for the Freight and Servicing SPD Options

- 1.65 A total of three selected options and nine reasonable alternative options have been subject to Strategic Environmental Assessment by LUC on behalf of the City of London for the Freight and Servicing SPD. Selected options are those which have been included in the draft SPD, whereas reasonable alternative options are different approaches that were considered, but not included in the draft SPD.
- 1.66 The likely effects of the three selected options included in the SPD and reasonable alternative options are summarised below in relation to each SEA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. All effects are assumed to be long term unless otherwise specified.
- 1.67 Although the assessment of likely significant effects has focussed on the measures within each of the three selected options (minimise, match and mitigate), any new measures that are contained within section 5 of the SPD, which focuses on particular types of development, have also been considered in relation to each of the SEA objectives under the relevant selected option.

### Minimise Freight and Servicing Trips

- 1.68 This selected option is likely to have significant positive effects on air quality resulting from many of the measures included within it, particularly within the City of London. This is because the measures will result in a reduction in traffic and congestion on the roads in the City and a subsequently will reduce vehicle emissions. However, the option may also result in significant negative effects on air quality in specific locations outside the City of London, due to the use of out of town consolidation centres, which may locally increase vehicle numbers, although this is uncertain. Therefore this option has been given a score of mixed effects with potential uncertain significant positive and negative effects (++/-?) in regards to SEA1: improve air quality.
- 1.69 This selected option is given a significant positive score (++) against SEA2: climate change. This is because the measures will work to reduce the numbers of vehicles using the roads in the City and, as with SEA1 above, will therefore reduce congestion and vehicle emissions.
- 1.70 As a number of measures within this selected option will work to reduce the amount of waste generated and ensure that the number of waste related trips is reduced, this option is given a score of significant positive score (++) in regards to SEA3: waste.
- 1.71 This selected option is given a mixed score with uncertainty (+/-?) in relation to SEA4: Health. The option has been identified as having mixed effects as many of the measures will have beneficial effects on health though improved safety, amenity and air quality as a result of fewer large vehicles using the roads. However, there is uncertainty, and probable negative effects on health, associated with the use of consolidation centres, due to possible local decreases in air quality and amenity and safety issues resulting from additional traffic around these centres.
- 1.72 This selected option has been scored with uncertain mixed effects (+/-?) in regards to SEA5: conserve and enhance the historic environment. This score results from the likely reduction in traffic in the City, which would enhance the settings of heritage assets, but also the potential negative effects that may arise in the event that a consolidation centre or routing to / from a centre is located within proximity to a heritage asset. There is uncertainty in the score as the locations of and routing to and from any consolidation centres is unknown and so it is uncertain whether there would be heritage assets in the areas affected.

### Reasonable alternatives

- 1.73 Four reasonable alternative options were identified by the City Corporation. While the selected options contain most of the measures that are included below as alternative options, the alternative options have been assessed as focussed measures that would be implemented in isolation.
- 1.74 *Reasonable Alternative 1 – Retain businesses as usual, whereby the number of deliveries allowed per day can be restricted to a number that will make the application operationally acceptable in planning terms.* It is considered that this alternative option will have no significant effects on the

SEA objectives above as it is not proposing any changes to the current situation. The scores for this option with regards to all SEA objectives will therefore be negligible.

- 1.75 *Reasonable Alternative 2 – Require the use of physical consolidation centres located outside the City for all deliveries to and from the site.* Consolidation centres are anticipated to be beneficial to the City itself due to a reduction in traffic. The effects on the areas around the consolidation centres, which are not currently known, are more uncertain and it is likely that there will be some significant negative effects resulting from an increase in traffic, noise and air pollution. The scores for this alternative option in relation to the SEA objectives can be seen in **Table 4**.
- 1.76 *Reasonable Alternative 3 – Require use of a micro-consolidation centre, which may be located within or outside the City boundary, for all deliveries to the site. The last mile delivery between the micro-consolidation centre and the site must be made by zero-emission means.* It is expected that this alternative option will have positive effects on the SEA objectives arising from a reduction in traffic and the promotion of zero emission transport. However, as with the option above there are also uncertain effects surrounding the location of the micro consolidation centres, which are unknown. It is not certain whether the micro consolidation centres will attract an increase in vehicles on a local level, which could result in adverse effect on the local area. The scores for this option are presented in **Table 4**.
- 1.77 *Reasonable Alternative 4 - Require the consolidation of all waste on-site prior to collection, with the promotion of 'reverse consolidation' whereby delivery vehicles will take away as much waste as possible.* This alternative option is anticipated to have positive effects on all SEA objectives as it will result in both a decrease in the amount of waste produced and a reduction in the number of servicing trips that a premises requires, thus reducing the number of vehicles on the roads. The scores for this option in relation to the SEA objectives are included in **Table 4** below. This alternative may not be available to sites that cannot accommodate on site consolidation.

**Table 4 Summary of scores**

	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
<b>Minimise freight and servicing trips</b>	++/--?	++	++	+/-?	+/-?
<b>Alternative 1 Retain business as usual</b>	0	0	0	0	0
<b>Alternative 2 Require the use of consolidation centres</b>	+/--?	+	0	+/-	+/-?
<b>Alternative 3 Require micro consolidation and last mile zero emissions</b>	+/-?	+	0	+/-	+/-?
<b>Alternative 4 Waste consolidation</b>	+	+	++	+	+

### Match Demand to Network Capacity

- 1.78 This selected option has been scored as having minor positive (+) effects in relation to SEA1: improve air quality, as although the measures will not reduce vehicle trips, they will work to reduce the numbers of vehicles on the roads at peak times, thus reducing the potential for congestion and resulting vehicle emissions.
- 1.79 This selected option has been scored minor positive (+) in relation to SEA2: climate change, as the likely reduction in daytime congestion, as discussed above, will result in a decrease in vehicle emissions.
- 1.80 This option has been given a negligible score (0) in relation to SEA3: waste, as it is not anticipated that any of the measures will have an effect on the generation or processing of waste.
- 1.81 This selected option is assessed as having mixed positive and negative effects (+/-). This is because the reduction in the number of vehicles, particularly large vehicles, along roads at peak times and along roads used by a high volume of pedestrians and cyclists is likely to have positive effects in terms of congestion and therefore air quality and safety. However, it is also recognized that a shift in deliveries and servicing to the weekend, evening and night time may have an adverse effect on amenity in terms of noise and light pollution for residents.
- 1.82 This selected option is scored minor positive uncertain (+?) in regards to SEA5: historic environment. This is because of the likely positive effects a reduction in traffic on the roads in the City will have on the setting of heritage assets with some uncertainty surrounding the actual routes that would be selected.

### Reasonable alternatives

- 1.83 Three reasonable alternatives to the selected option were identified by the City Corporation. Whilst the selected option contains most of the measures that are included in the alternative options described below, the alternative options, which have been assessed below, are considered as focussed measures and have been considered in isolation.
- 1.84 *Reasonable Alternative 1 – Retain business as usual, whereby weekday quiet times overnight (11pm – 7am) for residents are protected, along with Sunday and Bank Holidays. Deliveries by motor vehicle (except solo motorcycle) may be restricted at peak times to make an application operationally acceptable, (typically between 6-10am, 12-2pm and 5-7pm) but delivery windows of not less than two hours each (typically 10am-12pm and 2pm-4pm) would be available for deliveries.* It is considered that this alternative option will have a negligible effect (0) on all SEA objectives, as recorded in **Table 5** below, as it is not proposing any changes to the current arrangements and therefore does not represent a change to the baseline.
- 1.85 *Reasonable Alternative 2 – Move to a full daytime restriction, with no deliveries permitted between 7am and 7pm on weekdays.* It is expected that this alternative option will have a positive effect on air quality and climate change due to the reduction in the number of vehicles using the roads at the busiest times and a resultant reduction in vehicle emissions. It is also expected to have minor positive effects on the historic environment due to the reduction in traffic which is likely to enhance the settings of heritage assets. The effect on waste is considered to be negligible, while effects on health may be mixed as there is likely to be increases in safety and improvements in air quality, but off peak deliveries may lead to a loss of amenity for residents along selected routes. The scores against each objective are shown in **Table 5**.
- 1.86 *Reasonable Alternative 3 – Require all deliveries to take place overnight (i.e. between 11pm and 7am).* This alternative is very similar to that above, but specifies later delivery times. It is expected therefore that the scores will be the same as those for Reasonable Alternative 2.

**Table 5 Summary of scores**

	SEA objective					
		SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
Measure or reasonable alternative	Match demand to network capacity	+	+	0	+/-	+?
	Alternative 1 Retain business as usual	0	0	0	0	0
	Alternative 2 No deliveries between 7am and 7pm	+	+	0	+/-	+
	Alternative 3 Require night time deliveries 11pm to 7am	+	+	0	+/-	+

**Mitigate the Impact of Freight Trips**

- 1.87 This selected option is scored significant positive (++) in relation to SEA1: air quality, as it is considered that the measures will reduce in vehicle emissions as a result of sustainable driving practices, reduced congestion, and the use of low or zero emission vehicles.
- 1.88 This selected option is anticipated to have significant positive effects in regards to climate change for the same reasons as described for SEA1 above. Therefore, it has been given a significant positive score (++)
- 1.89 It is considered that this option will have a negligible effect (0) on SEA 3: waste, as the measures are unlikely to affect the generation or processing of waste.
- 1.90 This selected option has been scored significant positive (++) in relation to SEA4: health as the measures, which include safer driving practices, reduced idling and use of low emission vehicles, are likely to result in significant improvements to air quality, safety and amenity.
- 1.91 This selected option has been scored minor positive uncertain (+?) in relation to SEA5: historic environment due to the enhancements the measures may have on the setting of heritage assets though the reduction in the amount of traffic and noise pollution. Effects are uncertain as any particular freight and servicing routes that may be used which avoid heritage assets are currently unknown.

**Reasonable alternatives**

- 1.92 Two reasonable alternatives to the selected option have been identified by the City Corporation. While the selected option contains most of the measures that are included below in the alternative options, the two alternative options assessed should be considered as focussed measures and assessed in isolation. They will therefore score differently.

- 1.93 *Alternative 1 – Retain business as usual, whereby the environmental impact of servicing is required to be minimised with no formal restriction on the type of vehicle used. Note that mayoral policies (T charge and Ultra Low Emission Zone) will, in future, levy charges upon less clean motor vehicles entering central London.* This alternative option is expected to have a negligible impact (0) on all of the SEA objectives as it is not proposing a change to the baseline situation.
- 1.94 *Alternative 2 – Require the use of zero-emission vehicles to be used at the point of delivery to the site in the City.* It is anticipated that this option will have significant positive effects on both air quality and climate change through the reduction in vehicle emissions. The impacts on waste and the historic environment are expected to be negligible as this option will affect neither the generation of waste or the setting or character of a heritage asset. The effect on health is anticipated to be positive, due to a reduction in vehicle emissions and an associated improvement in air quality.

**Table 6 Summary of scores**

Measure or reasonable alternative	SEA objective				
	SEA1: Air Quality	SEA2: Climate Change	SEA3: Waste	SEA4: Health	SEA5: Historic Environment
Mitigate the impact of freight trips	++	++	0	++	+?
Alternative 1 Retain business as usual	0	0	0	0	0
Alternative 2 Require use of zero emission vehicles at delivery point	++	++	0	+	0

## Mitigation

- 1.95 This section suggests measures that could be put in place to avoid or lessen the potential negative effects identified in the SEA of the SPD. Mitigation is only considered necessary in regards to the negative effects associated with the use of consolidation centres, as this measure is the only one that is likely to result in significant negative effects.
- 1.96 It is anticipated that the below mitigation would help to avoid or reduce any adverse impacts resulting from the use of consolidation centres:
- Ensuring as far as possible that, in line with Policy 2.17 of the London Plan, consolidation centres are located in preferred industrial locations and are not located in areas that would; affect the character or setting of a heritage asset, affect local residents or affect any other sensitive receptors such as schools or hospitals.
  - When routing traffic to consolidation centres ensure that this is along appropriate roads, i.e. those large enough to accommodate larger delivery vehicles, those with minimal residential development and those that will not lead to an adverse effect on the setting of a heritage

asset. A transport plan could be produced for the consolidation centre which sets out which routes should be used.

- If the consolidation centre is to be located in a more residential area or an area frequently used by the public, ensure that it is screened from view, sensitive lighting is used, noise is minimised and if the area is residential then the centre is only operational during the daytime, when most residents are likely to be at work and their sleep will not be disturbed. Again this could be set out in a transport plan. However, as the centres would be outside the administration of the City Corporation this acts as a recommendation to developers when considering the design of consolidation centres.
- As far as possible use a booking system or delivery timing system to reduce the possibility of congestion and subsequent local air quality issues. To reduce the adverse effects on air quality and climate change, the use of low or zero emission delivery vehicles should be encouraged.

- 1.97 Mitigation for the second selected option 'match demand to network capacity' may be required in terms of noise and light pollution occurring from evening, night time and weekend deliveries, leading to a loss of amenity for residents living along the route. One of the measures in the SPD states that '*All deliveries requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre. Details of the delivery and servicing timings and how they will be managed to minimise noise impacts at all stages of the delivery process should be included in the DSP.*' This is expected to help mitigate negative effects of noise and light pollution.
- 1.98 The selected option also contains a measure requiring the use of appropriate routes that avoid residential areas, therefore minimising the impact of servicing and delivery vehicles on residents in regards to loss of amenity though noise and light pollution.
- 1.99 In addition to measures to mitigate a loss of amenity, any selected delivery and servicing routes that avoid areas of high pedestrian and cycle use as well as residential areas, should also aim to avoid heritage assets so as not to adversely affect their setting.
- 1.100 It is not anticipated that there will be any significant adverse effects on the SEA objectives as a result of the third selected option 'mitigate the impact of freight trips', therefore no mitigation is required.
- 1.101 To further lessen the environmental impacts it is recommended that the additional measure included in Section 5 of the SPD, which sets out the need for engines to be turned off unless absolutely necessary for deliveries at food and drink retail / pubs, should be expanded to include other uses, for example offices and other general retail.

## Cumulative effects of the Draft Freight and Servicing SPD

- 1.102 When the three selected options are considered cumulatively it is expected that the SPD will result in **mixed effects, with significant positive and significant negative effects (++)/--?) on SEA1: air quality**. It is considered that the three selected options will work together to cumulatively improve air quality as they will result in decreases in road traffic, congestion and vehicle emissions. However, uncertain significant negative effects are also identified as a result of the use of out of town consolidation centres, which could lead to increases in local congestion and increased traffic movements in the areas where these are located.
- 1.103 Cumulatively, it is considered that the three selected options will have **significant positive effects (++) on SEA2: climate change**. The measures within each option will work together cumulatively to significantly reduce the contribution of freight and servicing in the City to climate change through reductions in road traffic, vehicle congestion and emissions.
- 1.104 With the three selected options considered cumulatively it is anticipated that the SPD will result in **minor positive effects (+) on SEA3: the waste hierarchy**. This is due to the measure in

selected option 1 'minimise' which promotes the on-site recycling of deconstruction waste, other measures are considered to have negligible effects in terms of waste.

- 1.105 Cumulatively it is anticipated that the three selected options will have **uncertain mixed effects on SEA4: health with significant positive effects (+/-?)**. When the positive effects arising from the measures within each of the three options are considered cumulatively it is anticipated that significant benefits to human health will result due to improvements to safety, daytime amenity for residents and visitors and air quality. However, negative effects also need to be included due to losses in residential amenity as a result of weekend and night time servicing and also potential decreases in air quality and amenity in the vicinity of consolidation centres.
- 1.106 When the three options are considered cumulatively, **uncertain mixed effects (+/-?) on SEA5: the historic environment are anticipated as a result of the SPD**. Mixed effects are anticipated as many of the measures within the three options may result in enhancements to the settings of heritage assets through re-routing and also reductions in congestion. However, negative effects have been identified as possible in relation to consolidation centres. The effects overall are considered to be uncertain as they depend upon the routing of vehicles which is not known at this stage.

## Monitoring

- 1.107 The SEA Regulations require that *'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'* and that the environmental report should provide information on *'a description of the measures envisaged concerning monitoring'*. 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.
- 1.108 Indicators are proposed in relation to the SEA objectives for which potential significant positive or negative effects were identified as a result of any of the draft SPD measures. This includes air quality (SEA1), climate change (SEA2), waste (SEA3) and health (SEA4). **Table 7** shows the proposed monitoring framework for the SPD.

**Table 7 Proposed monitoring framework for the Freight and Servicing SPD**

SA objectives	Proposed monitoring indicators
SEA1: Improve air quality	<ul style="list-style-type: none"> <li>Number of planning applications that include an air quality assessment<sup>19</sup> (source: Planning Dept Uniform query)</li> <li>Changes in the concentration of air pollutants in the City (source: City of London Environmental Health)</li> </ul>
SEA2: Reduce activities that exacerbate climate change	<ul style="list-style-type: none"> <li>Percentage of deliveries made by zero emissions transport</li> <li>The number of vehicles used that meet the (forthcoming) Ultra Low Emission Zone standards</li> <li>Number of large delivery and servicing vehicles using the roads in the City<sup>20</sup></li> <li>Changes in greenhouse gas emissions from the City (source: BEIS energy / CO<sub>2</sub> trends data)</li> </ul>
SEA3: Adopt the 'Waste hierarchy' in all activities – reduce , reuse, recycle	<ul style="list-style-type: none"> <li>Percentage of waste sent for reuse, recycling and composting (source: estimate from waste arisings report)</li> <li>Quantity of waste transported by river from Walbrook Wharf (source: City of London cleansing services)</li> <li>Number of waste collection vehicles using the roads in the City<sup>21</sup></li> </ul>

<sup>19</sup> Air quality assessment should demonstrate how the development has met air quality challenges thereby avoiding refusal.

<sup>20</sup> The first three measures are likely to be undertaken through periodic surveys rather than real time monitoring.

SA objectives	Proposed monitoring indicators
SEA4: Improve the health of city workers, residents and visitors	<ul style="list-style-type: none"> <li>• Number of hospital admissions in relation to road accidents (source: City of London road casualty statistics)</li> <li>• Number of road accidents involving cyclists and pedestrians (source: City of London road casualty statistics)</li> <li>• Number of complaints regarding amenity (source: City of London environmental health)</li> <li>• Proportion of residents reporting their health as 'Good' or 'Very good' (source: Census)</li> </ul>

## Conclusions and Next Steps

- 1.109 The selected options and reasonable alternative options for the City of London Freight and Servicing SPD have been subject to a detailed appraisal against the SEA objectives, which were developed at the scoping stage of the SEA process.
- 1.110 The SEA has identified the potential for likely significant effects (positive and negative) for some of the options and measures contained within the selected options and reasonable alternative options.
- 1.111 Potential significant negative effects have been identified for only one measure, the use of out of town consolidation centres. It is anticipated that this measure, contained within the selected option to 'Minimise Freight and Servicing Trips', could have significant adverse effects on air quality outside the City of London in the vicinity of the consolidation centres, as well as minor negative effects on health.

## Next Steps

- 1.112 The SEA Report will be available for consultation alongside the Draft City of London Freight and Servicing SPD between 7<sup>th</sup> August and 30<sup>th</sup> September 2017.
- 1.113 Following this consultation, the SPD and accompanying SEA Report will be updated, if required. If there are no remaining issues, the City Corporation will adopt the SPD and an SEA Adoption Statement will be produced.

LUC  
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<sup>21</sup> As there are large numbers of private waste contractors operating in the City using a range of different vehicles it is anticipated that this would be difficult to monitor.