

Integrated Impact Assessment – draft City Plan 2036

Non-Technical Summary

IIA Scope

The Integrated Impact Assessment for the City incorporates: Sustainability Appraisal (SA), Health Impact Assessment screening (HIA) and Equalities Impact Assessment screening (EqIA). The assessment covers the requirements for Strategic Environmental Assessment seeking to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation. This non-technical summary outlines the information required in environmental reports (Schedule 2 Environmental Assessment of Plans and Programmes Regulations 2004)

1) The City Plan 2036 and its relationship with other plans and programmes

The City Plan 2036 will replace the adopted Local Plan 2015 as the primary policy document for Planning in London's central business district. It will guide development in the City through planning policies, contributing to the overall objectives of a flourishing society, thriving economy and outstanding environments. As the plan for spatial development in the City it must take account of a wide range of other plans and programmes at international, national, regional and local level. These other plans and programmes include environmental targets which the City Plan 2036 must contribute to realising.

2) Current state of the Environment

Economy – As a globally important business district the City's predominant land use is offices. The area contributes to local, regional, national and international prosperity and relies on wider transport, utility and housing infrastructure to ensure its success. The City's workforce is predicted to grow by approximately 100,000 during the period of the plan. Without a plan the City would be unable to provide suitable office space to accommodate this increased workforce taking account of new styles of working and accompanying infrastructure requirements.

Environment – Covering one square mile, the City has numerous pockets of open space and is bounded to the south by the River Thames site of metropolitan importance for nature conservation. In common with the rest of central London it has poor air quality, is a major contributor to carbon emissions and generates significant quantities of waste which must be transported elsewhere for treatment. Without a plan the pressure for development to accommodate additional workers could result in encroachment into the City's valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Lack of planning for transport, waste and air quality would result in degradation of the environment within and beyond the City. Planning for altered weather patterns as a result of climate change will become increasingly important during the plan period.

Social – The City has a low resident population with around 8,000 people living in the City and a high proportion of second homes. Over 480,000 people work in the City many of whom commute daily from a wide area to access workplaces, although working patterns are changing. The resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health and wellbeing of the City's workers and residents could be compromised if insufficient recreation, relaxation and health facilities were developed. Without changes to the adopted Local Plan the City's aspiration to develop Culture Mile around the Barbican Centre would be less likely to progress.

3) Environmental characteristics of areas likely to be affected

As a high-density urban environment the City and surrounding areas suffer from poor air quality, urban heat island effect, noise and have a high potential for land and water pollution as a result of contaminated water run-off. Wider initiatives on air and water quality such as the London Ultra Low Emission Zone and the Thames Tideway Tunnel will improve some aspects but the City's Local Plan is an essential element in implementation of these initiatives within the City.

4) Designated Areas

There are no designated European sites within the City of London boundary but there are two which lie wholly or partly within a 10km buffer area:

- Epping Forest SAC
- Lea Valley SPA and Ramsar site

A separate Habitats Regulation Assessment Screening has been carried out which concludes that *“the City of London Draft Local Plan ‘City Plan 2036’ is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA”*.

5) Environmental protection objectives

The IIA framework includes a review of other plans and programmes, identification of sustainability issues and problems, assessment of policy options and draft policies against a series of social, environmental and economic IIA objectives which include health and equalities objectives. Detailed objectives and criteria (para 3.5) were subject to consultation at scoping stage and were used to assess the impacts of the draft plan.

6) Significant Effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City's IIA objectives showed general agreement between the IIA aspirations and the objectives of the plan. This

assessment assisted in strengthening the City Plan 2036 objectives, further promoting sustainability through the Outstanding Environments objective and heritage protection through the Key City Places objective.

The assessment of the draft City Plan policies against the IIA objectives demonstrates that the impact of the plan will be largely positive as summarised below.

Parameter	Effect of draft City Plan 2036
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna.
Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health
Soil, Water and Air	Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement.
Climatic factors	Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City's carbon emissions. Flood Risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate
Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2036 policies including safe and secure City, visitors arts and culture, open spaces and are reinforced by policies which address the City's Key Areas of Change
Cultural heritage and Landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from distant viewing points

7) Mitigation measures

A number of uncertainties were identified and assessment tables (Appendix 5) recommend mitigation that could be used to deal with these uncertainties. For example:

Flourishing Society

- Inclusiveness in play facilities and areas should be promoted
- Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses.
- Introduce consistency of approach on over concentration of student housing, hotels and short lets

Thriving Economy

- Designs of new office and retail development will be key to their sustainability
- Policy needs to define what types of “meanwhile uses” would be acceptable

Outstanding Environments

- A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible
- Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate.
- Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs
- Reference should be made to other historic assets not just archaeology in flood risk & SuDS policy
- Safeguards should be included to ensure that on site waste treatment facilities do not cause disturbance to neighbouring uses

Key Areas of Change

- Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan.
- Identification of heritage assets in the Thames Policy Area is recommended

The IIA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the IIA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan.

Mitigation measures will be incorporated into policies alongside any changes made in response to consultation comments.

8) Reasons for selecting alternatives, assessment method and difficulties encountered

In developing the City Plan 2036, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement

Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses. One of the main difficulties encountered is the uncertainty surrounding the UK's decision to leave the EU.

The objectives of the City Plan 2036 could be achieved through different policy options in some cases. Reasonable alternatives were evaluated for protection of offices, balance of land uses between commercial, housing retail hotels and other uses, infrastructure and security, river related uses and river transport, hotels and business accommodation, historic environment, tall buildings and views protection, energy & CO2 emissions, air quality, transport, waste, flood risk, open spaces, retail, housing numbers, location and tenure, social and community infrastructure.

The outcome of this assessment was used to identify the preferred options to take forward into policy for the draft City Plan 2036. Reasons for choosing the preferred option and rejecting other options have been included in this report (section 5.5).

9) Monitoring

Mitigation measures will be incorporated into policies alongside any changes made in response to consultation comments.