

# Integrated Impact Assessment: Non-Technical Summary - March 2020

## IIA scope

The Integrated Impact Assessment (IIA) 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 as set out in section 4.1. 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 over 110,000 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 520,000 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.

Further details of the issues the City faces are set out in section 4.3.

### 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 (section 4.2). 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 Regulations 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 likely effects of the policy options and draft policies of the City Plan 2036 were appraised by reference to a framework of social, environmental and economic objectives and supporting criteria, which include health and equalities objectives (Section 3.5). These were informed by a review of other plans and programmes and identification of sustainability issues and problems facing the City and were subject to consultation at the scoping stage.

### 6) Significant effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City's IIA objectives (section 5.2) 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 proposed submission City Plan 2036 policies against the IIA objectives (section 5.6) demonstrates that the impact of the plan will be largely positive as summarised below.

Parameter	Effect of draft City Plan 2036 (significant effects are marked in <b>bold text</b> )
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. <b>Significant positive impacts on local biodiversity should result from implementation of the open spaces and green infrastructure policies.</b>
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. <b>Significant positive impacts on health and environmental protection will result from the healthy and inclusive City policies.</b>
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. <b>Policies for the Thames riverside and air quality, contaminated land and water quality will have significant positive impacts on soil, water and air.</b>
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. <b>No significant climate impacts were identified from the implementation of the plan due to the small geographic area covered.</b>
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. <b>The City's Key Areas of Change policies reinforce the emphasis on quality buildings and spaces generating significant local positive impacts.</b>
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. <b>Significant positive impacts on cultural heritage will result from Culture Mile, Smithfield and Barbican area policies.</b>

The assessment of the draft City Plan 2036 has been carried forward unchanged to the proposed submission stage for the majority of policies. Where significant changes have been made to the Plan as a result of consultation responses, new evidence, legislative changes and IIA findings these changes have been assessed. This includes aspects of policies on air quality, health, housing, design, historic environment, protected views and trees. The IIA of these changes demonstrates that the changes will have mainly positive impacts. In some cases, the change results in more positive impacts at proposed submission stage e.g. extending the Fleet Street policy to include Ludgate Hill has resulted in a significant positive impact for the heritage assets objective. The opportunity has also been taken to review the assessments from the draft Plan stage in the light of updated evidence and to correct any apparent inconsistencies in the scoring framework, for instance with regard to the relative impacts of the various Key Areas of Change.

## Summary of the impacts of Proposed Submission City Plan 2036 policies against IIA objectives

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Contribute to a Flourishing Society																
S1	Healthy & Inclusive City			-	-	-										
S2	Safe & Secure City				-	-	-	-		-			-		-	
S3	Housing			-	-	-	-	-	-	-			-	-	-	
Support a Thriving Economy																
S4	Offices			-					-	-			-	-		
S5	Retail								-	-				-	-	
S6	Culture, Visitors Night Economy															
S7	Smart Utilities & Infrastructure			-					-	-		-	-	-	-	-
Shape Outstanding Environments																
S8	Design											-	-		-	
S9	Vehicle Transp. Servicing				-				-	-		-	-		-	-
S10	Active Travel & Healthy Streets				-	-				-		-	-		-	
S11	Historic Environment			-		-	-	-			-	-		-		
S12	Tall Buildings					-		-		-	-	-	-	-	-	
S13	Protected Views			-		-	-	-	-	-	-	-	-	-	-	-
S14	Open Space Green Infrastructure					-						-			-	
S15	Climate resilience Flood Risk			-		-					-				-	-
S16	Circular Economy and Waste				-				-	-		-	-		-	-
Key Areas of Change																
S17	Thames Policy Area											-		-	-	-
S18	Blackfriars											-		-	-	-
S19	Pool of London													-	-	-
S20	Aldgate & Tower															
S21	City Cluster											-				-
S22	Fleet Street & Ludgate					-	-	-					-	-	-	-
S23	Smithfield & Barbican													-		-
S24	Culture Mile						-	-	-	-				-		
S25	Smithfield						-	-	-	-					-	-

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
S26	Liverpool Street						-	-				-			-	-
Implementation																
S27	Planning contributions				-	-	-		-	-			-	-		

### Key

	Impact of implementing policy	Response to IIA assessment
↑	Significant positive effect	Consider whether further enhancement is possible
↑	Positive effect	Consider whether further enhancement is possible
↕	Uncertain effect	Consider policy wording changes and/or mitigation and monitoring
↑↓	Both positive and negative effect (minor rather than significant)	Consider policy wording changes and/or mitigation and monitoring
↓	Negative effect	Consider policy changes and/or mitigation
↓	Significant negative effect	Consider changing the policy
-	Negligible effect	

## 7) Mitigation measures

A small number of negative effects and a number of uncertainties were identified and assessment tables (Appendix 6) show what mitigation could be used to deal with these uncertainties. For example:

Mitigation proposed in IIA	How addressed in Local Plan
<b>Flourishing Society</b>	
<ul style="list-style-type: none"> <li>Inclusiveness in play facilities and areas should be promoted</li> </ul>	<ul style="list-style-type: none"> <li>Incorporated into Proposed Submission version City Plan 2036</li> </ul>
<ul style="list-style-type: none"> <li>Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses.</li> </ul>	<ul style="list-style-type: none"> <li>Dealt with elsewhere in the Proposed Submission Plan, albeit no specific reference to these uses. Policies CV3 and CV4 have been amended to include reference to waste impacts</li> </ul>
<ul style="list-style-type: none"> <li>Introduce consistency of approach on over concentration of student housing, hotels and short lets.</li> </ul>	<ul style="list-style-type: none"> <li>Reference to over concentration of student housing, hotels and short lets has been removed since it is not possible to clearly define.</li> </ul>
<b>Thriving Economy</b>	

<ul style="list-style-type: none"> <li>• Designs of new office and retail development will be key to their sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporated into Proposed Submission version City Plan 2036</li> </ul>
<ul style="list-style-type: none"> <li>• Policy needs to define what types of “meanwhile uses” would be acceptable</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed mitigation considered to be too prescriptive because the acceptability of different meanwhile uses will vary according to site conditions and location Meanwhile uses will be considered a site by site basis..</li> </ul>
<b>Outstanding Environments</b>	
<ul style="list-style-type: none"> <li>• A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed monitoring framework includes Transport Strategy indicators linked to the impacts of consolidation centres</li> </ul>
<ul style="list-style-type: none"> <li>• Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>• This issue is dealt with comprehensively elsewhere in the Proposed Submission City Plan 2036 so has not been repeated in this policy.</li> </ul>
<ul style="list-style-type: none"> <li>• Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporated into Proposed Submission version City Plan 2036</li> </ul>
<ul style="list-style-type: none"> <li>• Reference should be made to other historic assets not just archaeology in flood risk &amp; SuDS policy</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporated into Proposed Submission version City Plan 2036</li> </ul>
<ul style="list-style-type: none"> <li>• Safeguards should be included to ensure that on-site waste treatment facilities do not cause disturbance to neighbouring uses</li> </ul>	<ul style="list-style-type: none"> <li>• New paragraph 6.8.35 has been added to avoid adverse local impacts</li> </ul>
<b>Key Areas of Change</b>	
<ul style="list-style-type: none"> <li>• Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan.</li> </ul>	<ul style="list-style-type: none"> <li>• No further mitigation required.</li> </ul>
<ul style="list-style-type: none"> <li>• Identification of heritage assets in the Thames Policy Area is recommended</li> </ul>	<ul style="list-style-type: none"> <li>• Key buildings are incorporated into the Thames Policy Area KAOC diagram and Figure 17 shows designated heritage assets in the City.</li> </ul>

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.

## 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 and the consequences of its departure in January 2020. Another difficulty is the uncertainty created by ongoing changes to the strategic planning context, including changes to national planning policy and guidance and the review of the London Plan.

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 & CO<sub>2</sub> 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

A draft monitoring framework has been developed to monitor the significant effects of implementing the City Plan 2036. This will ensure that where uncertainties exist any unintended adverse effects are picked up quickly. The monitoring framework will be finalised on adoption of the City Plan 2036.