



City of London Corporation

**Planning for Sustainability
Supplementary Planning
Document
SEA Screening Opinion**

Final report
Prepared by LUC
February 2024



City of London Corporation

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Planning Document
SEA Screening Opinion**

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Chapter 1

Introduction

1.1 The City of London Corporation (CoLC) is the local planning authority for the City of London, the financial district of London. It has prepared a Planning for Sustainability Supplementary Planning Document (SPD).

1.2 LUC has been appointed by CoLC to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the SPD. Planning Practice Guidance (PPG)¹ states that there is no legal requirement for an SPD to be subject to SA, but that SEA may be required if it is likely to have significant environmental effects.

1.3 The SEA process is governed by the SEA Regulations² which transpose European Directive 2001/42/EC (the SEA Directive) into UK law. The Levelling-up and Regeneration Act, which received Royal Assent in October 2023, sets out detailed reforms to the planning system. Amongst other things, the Act allows for the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation.

¹ [Department for Levelling Up, Housing and Communities \(2016, updated 2023\) Planning Practise guidance](#)

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI2018/1232) and The Environmental Assessment

of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Chapter 2

SEA screening

Scope of the Planning for Sustainability SPD

2.1 CoLC has prepared the Planning for Sustainability SPD (November 2023), which relates to the City of London area. The purpose of the SPD is to provide guidance on how applicants for planning permission should approach sustainability in their developments through the application process. The SPD includes the following aims:

- Sets out the key approaches that CoLC is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme.
- Identifies key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme.
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion.
- Collates relevant recommended standards, certifications and guidelines.

2.2 The SPD has been prepared to provide additional detail and guidance on how to fulfil policies in the City of London Local Plan 2015, London Plan 2021 and the Revised Proposed Submission Draft City Plan 2040 (previously the City Plan 2036). The SPD will also be a material consideration in determining planning applications. The SPD sets out what planning officers expect to see addressed through the design of a development and applicants should work through all topic areas of the SPD.

2.3 This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City as follows:

- Climate change mitigation and adaptation
- Retrofit and reuse
- Greenhouse gas emissions and energy use

- Whole Life-Cycle Carbon
- Operational emissions and energy use
- Circular economy
 - Circular Economy in Construction
 - Operational Circular Economy
- Climate resilience
 - Flood Risk and sustainable urban drainage
 - Water Resource Management
 - Building and Urban Overheating
 - Pest & Diseases
 - Infrastructure resilience
- Biodiversity
 - Urban greening
 - Urban greening Factor
 - Biodiversity net gain

Baseline information

2.4 This section outlines baseline information for the City of London that is relevant to plan-making and SEA. It draws from the information set out in the Sustainability Appraisal (SA) report for the Draft City Plan 2040 (Local Plan Review)³.

Context

2.5 The City of London Corporation is the local planning authority for the City of London. The City of London forms part of London as a whole, along with 32 other London Boroughs. The City of London, also known as the Square Mile, is the financial district of London.

Biodiversity, Flora and Fauna

2.6 Biodiversity within the City of London is constrained by the high density of buildings and built infrastructure along with the pressure on limited areas of isolated open space, which are well used. However, there has been an increase in the number of areas of open space from 32 hectares in 2011/12 to 35 hectares in 2021/22⁴.

2.7 There are a total of 10 Sites of Importance for Nature Conservation (SINCs) in the City. Upon adoption of the emerging City Plan 2040, the City is projected to have 13 SINCs. The potential new SINCs are: Postman's Park; Portsoken Street Garden; and St. Dunstan in the East Church Garden.

2.8 The City of London Biodiversity Action Plan (BAP)⁵, which is currently under review, provides a framework to fulfil all legislative requirements relating to the management of green spaces and identifies and prioritises actions for biodiversity at a local level.

Population

2.9 The City of London as the financial district for London has a low resident population and a large daytime population, most of whom commute to the City from elsewhere in London and beyond. According to the 2021 Census the population of the City of London is 8,600⁶. Data taken from the City Statistics briefing shows that in 2021, there were 587,000 workers in the City of London⁷. When looking at the age profile of the resident population, age groups between 0-19, 20-64 and 65+ are all expected to increase between 2011 and 2036. The age group of the 65+ is expected to see the most significant increase from 1,051 in 2011 to 2,649 in 2036, largely due to the ageing of the population within the main residential areas of Barbican and Golden Lane⁸.

2.10 Housing land use in the City of London is concentrated around four estates (Barbican, Golden Lane, Middlesex Street and Mansell Street), with the remainder living in smaller residential clusters at Smithfield, Queenhithe, Carter Lane and City West. There is a high number of second home ownership within the City. Around 1,714 of the 7,636 homes in the City are second homes (approximately 22.5% of the housing stock)⁹.

Human Health

2.11 The residents of the City consider themselves to be in good or very good health (87.8% of all residents). In 2021, 57% of City residents described their health as "very good", increasing from 55% in 2011. Those describing their health as "good" rose remained steady at 31 between 2011 and 2021¹⁰.

2.12 In terms of life expectancy, male life expectancy at birth was 86.8 years, which was 9.3 years higher than the England

³ [City of London \(2024\) Sustainability Appraisal main report Local Plan Review](#)

⁴ [City Plan 2040 Revised Proposed Submission Draft February 2024](#)

⁵ [City of London Biodiversity Action Plan 2021-2026](#)

⁶ [Office for National Statistics \(2023\). How life has changed in the City of London: Census 2021](#)

⁷ [City of London Statistics briefing](#)

⁸ [City Plan 2036 Proposed Submission Draft Topic Paper 2 - Housing](#)
⁹ [Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government \(2022\). Dwelling stock \(including vacant\)](#)

¹⁰ [Office for National Statistics \(2023\). How life has changed in the City of London: Census 2021](#)

average. Female life expectancy at birth was 90.7 years, which was 7.6 years higher than for England¹¹.

Soil

2.13 Due to the high concentration of buildings and hard surfaces in the City, there are limited high quality soils and land is predominantly in urban use according to the Agricultural Land Classification¹².

Water

2.14 The River Thames flows along the southern boundary of the City. According to the Environment Agency, the middle section of the River Thames that flows past the City is considered to be in moderate condition. There has been no significant change in the water quality between 2013 and 2019¹³.

2.15 The only area at risk of flooding is the southern part of the City within the immediate vicinity of the River Thames. However, the City is protected by a wall along the River Thames and by the Thames Barrier¹⁴.

Air

2.16 The main contributor to local air pollution is road traffic. The City, alongside the rest of central London, is an Air Quality Management Area for fine particulates (PM₁₀) and nitrogen dioxide (NO₂). Between 2015 and 2021, pollution levels at all monitoring sites were significantly below the limits set out in UK air quality objectives for PM₁₀ and NO₂. However, concentrations of PM₁₀ remained above the relevant WHO guidelines at most sites¹⁵.

2.17 The implementation of highway and environmental enhancement schemes has contributed to a reduction in people's exposure to poor air quality by widening pavements, creating traffic free environments and using planting to screen open spaces from roads. Major strategic transport projects such as the Elizabeth Line, Thameslink and the Northern Line/ Bank Station upgrade have been completed and are delivering additional public transport capacity to, from and through the City.

Climatic Factors

2.18 The issues of energy consumption and the consequent emissions of carbon dioxide are of significant importance to CoLC and have a contributory impact on climate change.

2.19 Overall carbon emissions in the City have decreased significantly, particularly in more recent years. Total carbon emissions for the City in 2020 met the Greater London Authority's target of a 60% reduction in carbon emissions by 2025. Industrial, commercial and transport remain the biggest emitters of carbon emissions. However, since 2021 there has been a 60% reduction in carbon emissions in these sectors¹⁶.

Material Assets

2.20 In 2022, the City contributed around £85 billion in GVA to the UK's national income, which is 3.5% of the UK's output and 15% of London's output¹⁷.

2.21 Offices are the predominant land use within the City. As of the 31st March 2022, there was 9,440,000 m² of gross office floor-space within the City. This is expected to rise to 9,668,000 m² in 2025/26. Financial and professional services remain the two largest sectors in the City. Other main land uses are transport, open space, housing, retail, utilities, public buildings, hotels and visitor attractions, education and health¹⁸.

2.22 Enhancement of the public realm is important in providing the high-quality environment that is fitting for one of the world's leading financial and business centres. There are a number of Area Enhancement Strategies for the City, the most recent being the City Cluster Vision and Culture Mile Look and Feel Strategy.

Heritage and Tall buildings

2.23 There is a significant contrast between the modern, high-rise parts of the City and the more historic, predominantly low-rise areas. Intense development pressures in the City have significant implications for both individual heritage assets within the City's boundaries, and also for wider historic character in the neighbouring boroughs of Tower Hamlets, Islington, Camden, Westminster, Southwark and Lambeth and beyond.

2.24 The City contains a high concentration of heritage assets, including over 600 listed buildings, 27 conservation areas, 48 scheduled monuments and 5 registered parks and gardens within the Square Mile. Many of these heritage assets contribute significantly to the City's skyline, namely St Paul's Cathedral and the Monument, whilst the City also provides part of the backdrop and setting for the Tower of London

¹¹ Public Health England Profile of the City of London

¹² Natural England 2011 Agricultural Land Classification map London and the South East

¹³ Environment Agency Thames Middle Water Quality Data 2013-2019

¹⁴ Gov.uk (2021) Flood risk mapping

¹⁵ City of London Corporation Air Quality Annual Status Report for 2022 (May 2023)

¹⁶ Greater London Authority (2023). London Energy and Greenhouse Gas Inventory

¹⁷ City of London Statistics Briefing

¹⁸ City of London Local Plan Monitoring Report – Offices (2022)

World Heritage Site. Today, the City has become internationally famous for its high-rise architecture.

2.25 The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. 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 by the City Corporation. Landmarks such as St Paul's Cathedral, the Monument and the Tower of London are internationally renowned. As such CoLC seeks to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of City landmarks.

2.26 Tall buildings began emerging in the City on the completion of Tower 42 in 1981. In the City of London, the number of tall buildings and associated floorspace permitted and completed during the period 2011/12 to 2021/22 has varied. There were nineteen tall buildings completed over the period 2011/12 to 2021/22, which delivered over 1,186,000 m² of floorspace¹⁹.

SEA screening

2.27 An assessment has been undertaken to determine whether the Planning for Sustainability SPD requires SEA in accordance with the SEA Regulations.

2.28 **Figure 2.1** overleaf presents a flow diagram entitled 'Application of the SEA Directive to plans and programmes', which is taken from A Practical Guide to the Strategic Environmental Assessment Directive²⁰. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions)

¹⁹ [City of London \(2023\). Local Plan Monitoring Report – Tall Buildings](#)

²⁰ [Office of the Deputy Prime Minister \(2005\) A Practical Guide to the Strategic Environmental Assessment Directive](#)

Figure 2.1: Application of the SEA Directive to plans and Programmes

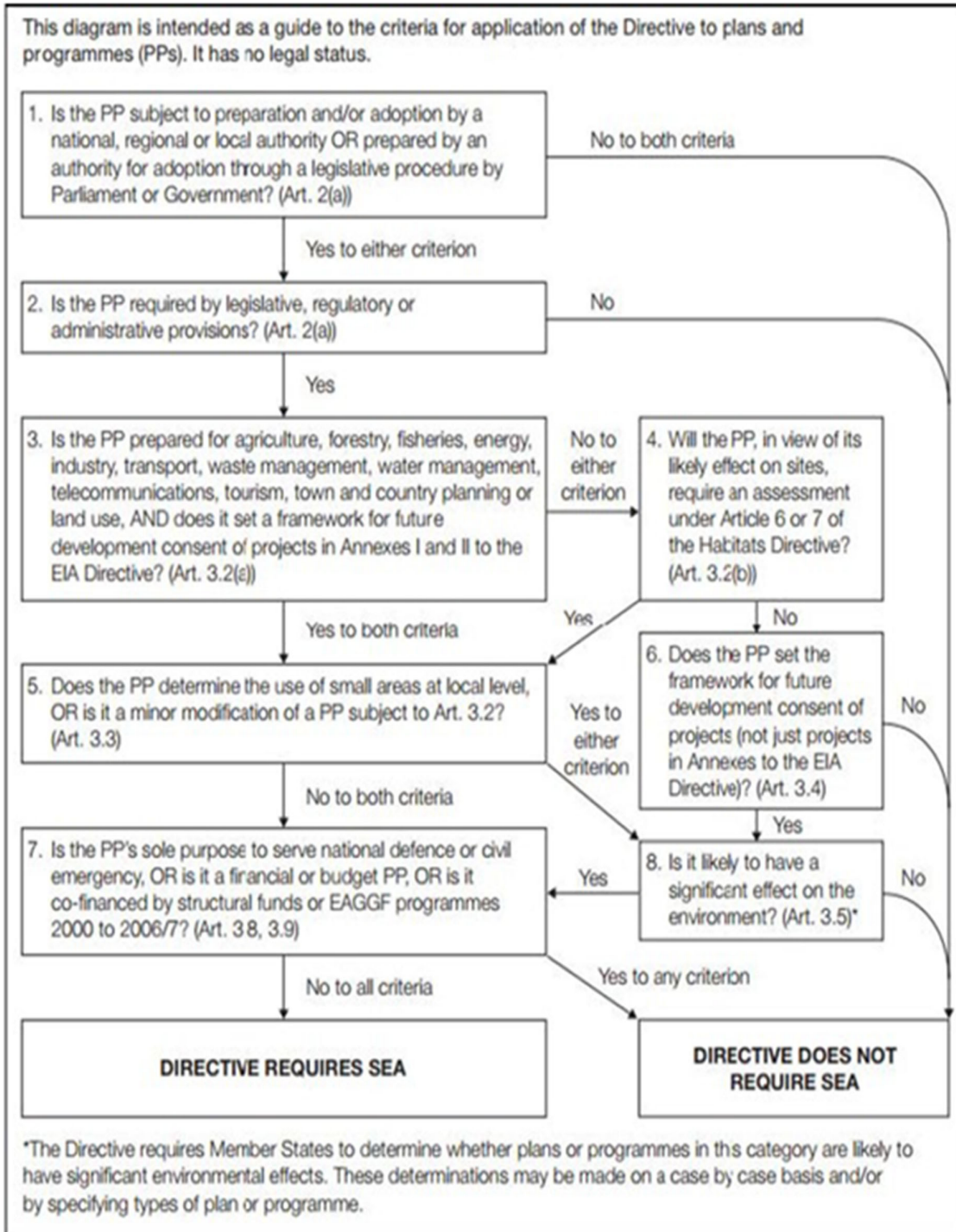


Table 2.1: Screening criteria for application of the SEA Directive to the Planning for Sustainability SPD

Screening question	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The SPD is being prepared by CoLC to support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040 under the Town and Country Planning (Local Planning) (England) Regulations 2012. SEA may be required - move to Q2.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The SPD is being prepared to support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040. While there is no requirement to produce the Planning for Sustainability SPD (it is an optional plan), once adopted it will become a material consideration when determining planning applications therefore it should continue to be screened. SEA may be required - move to Q3.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The SPD is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. SEA may be required - move to Q4.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA Screening (February 2024) of the SPD has been undertaken separately on behalf of the City of London Corporation by LUC and has concluded that no likely significant effects are expected on any European site, either alone or in combination with any other plans or programmes. SEA may be required – move to Q6.
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	The SPD does not allocate any sites for development although it sets out planning guidance that will be a material consideration for relevant planning applications. SEA may be required – move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	See below	See below

2.29 Further to question 8 of the SEA Screening guideline questions above, Schedule 1 of the SEA Regulations sets out criteria for determining the likely significance of effects. These are listed in **Table 2.2** below along with comments on the extent to which these significance criteria are met for the likely effects of the Sustainability SPD. A conclusion is then drawn as to whether the SPD is likely to have a significant effect on the environment and hence whether SEA is required.

Table 2.2: Likely significance of the effects of the Sustainability SPD

Significance criteria per SEA Regulations	Comments
The characteristics of the plan or programme, having regard, in particular, to:	
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Planning for Sustainability SPD will support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040, which set out the strategic policies relating to land use and development proposals. The SPD will be a material consideration in the determination of planning applications. The SPD will provide additional detail and guidance on how to fulfil policies of the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040 which are most relevant to climate change and sustainability. The SPD sets out what planning officers expect to see addressed through the design of a development and applicants should work through all topic areas of the SPD. The SPD does not allocate sites for built development.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPD has to be in conformity with Local Plan 2015, London Plan 2021 and the Draft City Plan 2040. The SPD must also have regard to the National Planning Policy Framework. The SPD does not have influence over other plans. The SPD will be a material consideration in the determination of planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The overall purpose of the SPD is to promote sustainable development within the City of London. The SPD provides additional detail and guidance on the retrofitting and reuse of buildings and the circular economy. The additional detail and guidance supports Draft City Plan 2040 policies CE1, S8, S11, HE1, CR1, DE1, DE8, S1, HL2, S10, AT1, AT2, S16, S7 and S15; Local Plan 2015 policies CS12, DM12.1, CS15, CS17, DM17.2, CS10 and CS18; and, London Plan 2021 policies D3, SI 1, SI 2, SI 3, SI 4, SI 5, SI 6, SI 12, SI 13, D4, SI 7, SI 8, D6, D11 and GG6 which support delivering good design, climate change resilience and adaptation and a move to low carbon living. In line with the SPD, development should contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to the City of London was described earlier in this chapter. Biodiversity in the City is relatively constrained by the high levels of development. However, there are ten SINC's within the City. There is also a high concentration of heritage assets which include over 600 Listed buildings, 27 conservation areas, 48 scheduled monuments and 5 registered parks and gardens.
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	The SPD supports adopting a retrofit first approach which aims to minimise carbon emissions, reduce construction waste and support the reuse of existing buildings. The SPD also supports the circular economy principles which includes reducing waste production and supports zero waste development. The SPD identifies opportunities to tap into waste heat sources within the City. The SPD also supports minimising the volume of water required to be treated and outlines considerations for development related to water resource management.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Planning for Sustainability SPD does not allocate sites for built development. The SPD covers the period up to 2040. Effects of the Planning for Sustainability SPD are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. The cumulative nature of the effects.	The effects of the Sustainability SPD will act in combination with those of the Local Plan.

Significance criteria per SEA Regulations	Comments
8. The transboundary nature of the effects.	The SPD focuses on the City of London only. Transboundary effects under the SEA Regulations refers to transboundary effects on other EU Member States; therefore they are not relevant to the SPD.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the SPD.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The SPD covers all of the City of London. The City of London has a resident population of 8,600. However, a high number of people commute into the City of London.
<p>11. The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use. 	<p>The City of London is intensively developed.</p> <p>Biodiversity within the City of London is constrained by the high density of buildings and built infrastructure and the pressure on the limited areas of isolated open space which are heavily used. There are a number of SINC's in the City.</p> <p>The health of the City's resident population and their life expectancy are higher than regional and national averages.</p> <p>The City contains a high concentration of heritage assets and many of these heritage assets contribute significantly to the City's skyline. The City also provides part of the backdrop and setting for the Tower of London World Heritage Site and is internationally famous for its high-rise architecture.</p> <p>Road traffic in the City results in local air pollution and while UK air quality objectives are met, WHO guidelines for PM₁₀ are not.</p> <p>The section of the River Thames that flows past the City is in moderate condition.</p>
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no designated protected landscapes within the City of London but it contains many important heritage assets which provides part of the backdrop and setting for the Tower of London World Heritage Site.

2.30 To assist in judging whether a plan or programme is likely to have significant effects, the SEA Regulations suggest that particular regard is given to the criteria set out in Table 2.2.

2.31 Having considered the characteristics of the Sustainability SPD against these criteria, the key findings are:

- While SPDs in general cannot set out new development policy, they can nevertheless influence the significance of the effects of development policies in the Local Plan by providing additional detail and guidance on their application, particularly since SPDs are a material consideration in determining planning applications.
- The environmental sensitivities of the plan area (the City of London) are such that development is capable of having a significant effect, for example on cultural heritage, biodiversity or air quality. However, the Planning for Sustainability SPD does not allocate sites for development and as such, it is not likely to have significant effects on the environment.
- The overall purpose of the Sustainability SPD is to promote sustainable development within the City of London. Furthermore, it does not allocate sites for built development. As such, it is not likely to have significant effects on the environment.

SEA screening conclusion

2.32 A screening assessment was undertaken by first applying the criteria from the SEA Directive. This determined that SEA of the SPD may be required, if it is likely to have a significant effect on the environment.

2.33 Criteria for determining the likely significance of effects from Schedule 1 of the SEA Regulations were then considered to inform a judgement on whether or not the Planning for Sustainability SPD is likely to have significant environmental effects when assessed against the environmental topics listed in the SEA Regulations. This determined that the nature of SPDs in general and of the receiving environment in the City of London are such that significant effects from an SPD are theoretically possible, particularly in relation to cultural heritage due to the high concentration of heritage assets and development pressures within the City. However, the focus of the Sustainability SPD is on promoting sustainable development and providing guidance on how applicants should approach sustainability in their developments. In addition, the Planning for Sustainability SPD does not allocate any sites for development and is therefore, not likely to have significant effects on the environment.

2.34 The conclusion of the SEA Screening is therefore that the Planning for Sustainability SPD is unlikely to

have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.35 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

February 2024