

## **Appendix 5- City Plan 2040 HRA Review**

**September 2025**

### **Introduction to this document**

The Appropriate Assessment (2024) identified at paragraph 6.5 that “The Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites.”

The Main Modifications to the City Plan make some amendments to the policies assessed within the Screening and the Appropriate Assessment. Therefore a review of these changes is necessary to conclude whether they have any implications on the conclusions within the Assessment.

### **Stage 1- Screening of Main Modifications to the City Plan 2040**

The first stage in the HRA Review has been to review the Main Modifications to the City Plan against the previous conclusions of the HRA Screening to identify if the changes could have any impact upon the conclusions reached. Where policies had previously been ‘screened’ into the Appropriate Assessment this was identified within the table and further assessment was required at Stage 2.

The results of this identified that the following policies which were screened in had some changes made to them through the Main Modifications:

- S3: Housing
- HS6: Student accommodation
- S4: Offices
- CV4: Hotels
- HL7: Sport and recreation

Table 1- HRA Review of Main Modifications

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 1 Strategic Priorities	City Plan Vision	MM1	<p><u>By 2040 the City of London will have become:</u></p> <ol style="list-style-type: none"> <li>1. <b><u>A stronger, more vibrant and competitive economy.</u></b> The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business.</li> <li>2. <b><u>A 7-day-a-week destination.</u></b> The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn.</li> <li>3. <b><u>A more sustainable city-</u></b> The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors.</li> <li>4. <b><u>A more inclusive and healthier city-</u></b> the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all.</li> <li>5. <b><u>A place where heritage and positive change are celebrated-</u></b>the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.</li> </ol>	<p><u>Chapter 1 Strategic Priorities:</u></p> <p>Assessment screened the policies which stem down from the priorities. No change.</p>	None
Chapter 2 Spatial Strategy	Key Diagram	MM2	<i>Change to include new Broadgate Tall Building Site on Key Diagram</i>	<u>Chapter 2 Spatial Strategy:</u> Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 2 Spatial Strategy	2.1 (10)	MM3	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, <del>and</del> the Fleet Valley <del>and the Broadgate tall building site,</del> which are identified as areas suitable for tall buildings.	<u>Chapter 2 Spatial Strategy:</u> Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	HL2 (1) Developers will be required to effectively manage <del>the</del> <u>their proposal's impact of</u> <del>their proposals</del> on air quality. Major developments must comply with the requirements of the Air Quality SPD <del>for</del> <u>which includes requirements for Air Quality Neutral Assessments and</u> Air Quality Impact Assessments (AQIAs).	<p><u>HL2:</u> Policy seeks to avoid adverse impacts on air quality from new development but will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	HL7 (2) Existing <del>public</del> sport and recreational facilities will be protected in situ, unless:	HL7: Leisure development as likely activity. If implemented effects on air pollution and changes in water quality/quantity. Policy permits sport and recreation facilities and therefore, could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.	‘Smaller contribution’ to air pollution identified in section 4.39 of the Screening Assessment.  To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	3.8.1 The City Corporation will protect existing <del>public</del> sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England’s Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of <del>public</del> sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current <del>public</del> facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>	HL7: As above	As above
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets. <u>For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.</u>	HL9: Policy sets requirements for new major development to undertake a rapid Health Impact Assessment and submit a full HIA for developments subject to an Environmental Impact Assessment or where the development could have health impacts and will not itself result in development.  No likely potential effects or need for scoping into the AA.	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	<p>2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City’s housing need and contributing to London’s wider housing needs by:</p> <p>a. ensuring the delivery of <u>applying the Mayor’s threshold approach of a minimum of 35% affordable housing and</u> a minimum of 50% affordable housing on public sector land;</p> <p>b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation’s satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and</p> <p>c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.</p> <p>3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.</p>	S3: Residential development. Potential effects on water quality or quantity. Policy seeks to protect existing housing and provide additional housing in or near identified residential areas (1,706 residential units between 2025/26 and 2039/40). This will contribute to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	<p>‘Main contributions’ to water quantity and quality identified in section 4.40 of the Screening Assessment.</p> <p>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</p>
Chapter 4 Housing	4.1.12	MM9	<p>4.1.12- The City Corporation’s Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through ‘windfall’ development rather than through the allocation of sites. <del>City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</del> It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</p>	Chapter 4 Housing: as above	As above

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Chapter 4 Housing	New paragraph	MM10	<p><i>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</i></p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 2- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr><tr><td><u>2022/23</u></td><td><u>96</u></td><td><u>Completions</u></td></tr><tr><td><u>2023/24</u></td><td><u>0</u></td><td><u>Completions</u></td></tr><tr><td><u>2024/25</u></td><td><u>29</u></td><td><u>Completions</u></td></tr><tr><td><u>2025/26</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td></td><td><b><u>2,116</u></b></td><td></td></tr></table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>	<u>2022/23</u>	<u>96</u>	<u>Completions</u>	<u>2023/24</u>	<u>0</u>	<u>Completions</u>	<u>2024/25</u>	<u>29</u>	<u>Completions</u>	<u>2025/26</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>342</u>	<u>Completions (projected)</u>		<b><u>2,116</u></b>		<u>S3</u> : as above.	As above
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Appendix 2	New appendix	MM11	<p><u>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</u></p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr><tr><td><u>2025/26</u></td><td><u>146</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>146</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>146</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>146</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2029/30</u></td><td><u>102</u></td><td><u>0</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2030/31</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2031/32</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2032/33</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2033/34</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2034/35</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2035/36</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2036/37</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2037/38</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2038/39</u></td><td><u>102</u></td><td><u>190</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td><u>2039/40</u></td><td><u>102</u></td><td><u>220</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td><b><u>Total</u></b></td><td><b><u>1,706</u></b></td><td><b><u>2,430</u></b></td><td></td></tr></table>	Year	Target* per annum	Units	Status	<u>2025/26</u>	<u>146</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>146</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>146</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>146</u>	<u>342</u>	<u>Completions (projected)</u>	<u>2029/30</u>	<u>102</u>	<u>0</u>	<u>Completions (projected)</u>	<u>2030/31</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2031/32</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2032/33</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2033/34</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2034/35</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2035/36</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2036/37</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2037/38</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2038/39</u>	<u>102</u>	<u>190</u>	<u>Completions (windfalls and capacity)</u>	<u>2039/40</u>	<u>102</u>	<u>220</u>	<u>Completions (windfalls and capacity)</u>	<b><u>Total</u></b>	<b><u>1,706</u></b>	<b><u>2,430</u></b>		S3: as above	As above
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Chapter 4 Housing	4.1.8	MM12	4.1.8 .... In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>	<u>Chapter 4 Housing:</u> as above	As above																																																																				
Chapter 4 Housing	4.1.10	MM13	4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 ( <u>an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year</u> ) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...	<u>Chapter 4 Housing:</u> as above	As above																																																																				

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Chapter 4 Housing	4.1.11	MM14	<del>4.1.11 The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.</del>	<u>Chapter 4 Housing:</u> as above	As above
Chapter 4 Housing	4.1.15	MM15	<del>4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.</del>	<u>Chapter 4 Housing:</u> as above	As above
Chapter 4 Housing	HS6 (2)	MM16	HS6 (2) Proposals for PBSA should be supported by <u>and secured through a nominations agreement with an</u> identified further or higher educational institutions operating in the City of London or the CAZ.	<u>HS6:</u> Student accommodation. Potential effect on changes in water quality or quantity. Policy supports the development of student accommodation, which would make a small scale contribution to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	'Smaller contributions' to water quantity and quality identified in paragraph 4.41 of the Screening Assessment.  <b>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</b>
Chapter 5 Offices	S4 (1)	MM17	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 <u>NIA (1,600,000 m2 GIA)</u> net during the period 2021 to 2040, phased as follows: <ul style="list-style-type: none"> <li>• 2021 – 2026 500,000m2 <u>NIA (666,666m2 GIA)</u></li> <li>• 2026 – 2031 400,000m2 <u>NIA (533,333m2 GIA)</u></li> <li>• 2031 – 2036 200,000m2 <u>NIA (266,666m2 GIA)</u></li> <li>• 2036 – 2040 100,000m2 <u>NIA (133,333m2 GIA)</u></li> </ul>	<u>S4:</u> Employment development. Potential effects on air pollution and changes in water quality or quantity. Policy seeks to protect existing offices and provide additional offices in the City. The scale of office development provided for is significant (minimum of 1.2 million m2 during 2021- 2040), and would contribute to effects relating to air pollution and changes in water quantity / quality. Development in the City must be car free, but employment development could attract trips from elsewhere	'Main contributions' to air pollution and water quantity and quality identified in paragraphs 3.38 and 4.40 of the Screening Assessment.  <b>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</b>
Chapter 5 Offices	5.1.1	MM18	<del>The minimum requirement of overall office floorspace target of 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040...</del>	<u>S4:</u> as above.	As above.
Chapter 5 Offices	5.3.9	MM19	5.3.9...Where a change <del>in</del> <u>of</u> use is proposed from office floorspace to another use,...  ....It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. ....</u>	<u>OF2:</u> Policy sets out circumstances in which loss of office accommodation would be inappropriate and routes any loss of in office space should follow and will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 7 Culture and Visitors	7.1.5	MM20	7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. <u>When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</u>	<u>S6:</u> Policy defines the mix of uses appropriate to the City of London to attract visitors but the development itself (e.g. hotels) is defined by other policies.  No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact									
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	MM21	<p><i>New paragraph 7.3.4</i></p> <p><u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u></p> <table><tr><td></td><td><u>On Site</u></td><td><u>Off Site</u></td></tr><tr><td><u>&gt; 10,000sqm gross floorspace</u></td><td><u>Yes. Provision will be commensurate with the scale of development</u></td><td><u>Not acceptable</u></td></tr><tr><td><u>&lt; 10,000sqm gross floorspace</u></td><td><u>Preferred. Provision will be commensurate with the scale of development</u></td><td><u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u></td></tr></table>		<u>On Site</u>	<u>Off Site</u>	<u>&gt; 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>	<u>&lt; 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>	<p><u>CV2:</u> Policy requires major developments to incorporate arts and culture provisions but will not itself result in new development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
	<u>On Site</u>	<u>Off Site</u>												
<u>&gt; 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>												
<u>&lt; 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>												
Chapter 7 Culture and Visitors	CV4 (2)	MM22	CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts	<p>CV4: Hotels and visitor infrastructure development. Potential effects on air pollution and changes in water quality or quantity.</p> <p>Policy sets out circumstances in which hotel development would be permitted. This would contribute to air pollution and water quality and quantity effects. Development in the City must be car free, but hotels could attract trips from elsewhere.</p>	<p>‘Main contributions’ to air pollution identified in paragraph 4.38 of the Screening Assessment.</p> <p>Mitigation identified in Screening Assessment: This policy states that hotels must be in suitable locations with good access to public transport, which will help to reduce trips and therefore air pollution associated with this policy.</p> <p>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</p>									



Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 8 Infrastructure	IN2	MM23	<p>1. Development must not lead to capacity or reliability issues in the surrounding area and <del>should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.</del></p> <p>2. Developers are required to <del>demonstrate, through effective engagement with</del> <u>provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.</u></p> <p>3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers <u>to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, which may require the provision of and have explored and (where feasible) provided</u> space within new developments for on-site infrastructure or off-site infrastructure upgrades.</p> <p><i>Policy clauses 2 and 3 renumbered.</i></p>	<p>IN2: policy sets out how development should provide infrastructure and will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 9 Design	9.1.0	MM24	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.	<p><u>S8</u>: Policy sets out design requirements for development, including addressing climate change, sustainable design, limiting light pollution and providing green infrastructure but will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 9 Design	9.1.3	MM25	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.	<u>S8</u> : as above.	As above
Chapter 9 Design	9.1.4	MM26	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits <u>for the site, its context and the whole City</u> before considering <del>the many wider</del> other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.	<u>S8</u> : as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.1.5	MM27	<u>9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.</u>	<u>DE1:</u> Policy sets out requirements for development regarding sustainable design, including energy efficiency, circular economy, limiting pollution and water use but will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 9 Design	DE1 (1)	MM28	DE1 (1) Development proposals should <del>follow</del> <u>adopt</u> a retrofit first approach; <del>thoroughly exploring the potential for retaining and retrofitting. At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.</del>	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (3)	MM29	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (7)	MM30	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. <del>Retention, refurbishment, retrofit and reuse</del> <u>Reuse, refurbishment and retention</u> of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (8)	MM31	DE1 (8) Proposals for major development will be required to: a. Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). <del>Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the waste category;</del>  <del>b. Commit to achieving a minimum NABERS UK rating of 5 stars; Commit to a minimum</del> <u>NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only);</u> c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.	<u>DE1:</u> as above.	As above
Chapter 9 Design	9.2.0	MM32	9.2.0 Materials – <del>retaining</del> <u>reducing</u> embodied carbon emissions from new build construction through retrofit and <del>in existing buildings and materials, and improving</del> resource efficiency.	<u>DE1:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.2.9	MM33	<p>9.2.9 For major development (<u>where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more</u>) the following information should be provided:</p> <ul style="list-style-type: none"> <li>- A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.</li> <li>- <u>A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.</u></li> <li>- An energy assessment in line with the Mayor of London's Energy Planning Guidance</li> <li>- An options appraisal following the City Corporation's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits</li> <li>- An air quality assessment to meet the requirements of the London Plan demonstrating that the development will <del>not result in deterioration in air quality</del> <u>be at least Air Quality Neutral</u>, in line with the City of London Air Quality SPD.</li> <li>- Details of collective infrastructure <u>and other environmental sustainability improvements for the site, its context or the City as a whole.</u> <del>which has been incorporated to address environmental challenges.</del></li> <li>- Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.</li> <li>- <u>Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options...</u></li> </ul>	DE1: as above.	As above
Chapter 9 Design	9.2.9	MM34	<p>9.2.9 <del>Extensions</del></p> <ul style="list-style-type: none"> <li><del>• If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements.</del></li> </ul> <p><b>For minor development</b></p> <ul style="list-style-type: none"> <li>• Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.</li> <li>• <u>For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.</u></li> </ul>	DE1: as above.	As above.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	DE4 (3)	MM35	3. Requiring all tall buildings <del>or major developments</del> to provide free to enter....	<p><u>DE4</u>: Policy sets out design requirements for roof terraces and elevated public spaces, including requirements for tall buildings, major developments, retail and leisure facilities to create attractive places and provided accessible elevated spaces. The policy will itself not result in development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 10 Transport	VT3 (4)	MM36	4. All off-street <u>non-residential bays for</u> car parking facilities must be equipped with <u>active</u> electric vehicle charging points <u>usable from the outset</u> .	<p><u>VT3</u>: Policy seeks to restrict car parking, provide charging facilities for electric vehicles and provide for taxi ranks at key locations but itself will not result in development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	<p>None.</p> <p>Mitigation identified in Screening Assessment: This policy states that “Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.” In addition, no new public car parks will be permitted and underutilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points. These will contribute to mitigation for air pollution impacts.</p>
Chapter 10 Transport	AT1 (c)	MM37	<u>AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.</u>	<p><u>AT1</u>: Policy sets requirements for developers to facilitate pedestrian movement and enhance permeability.</p> <p>No likely potential effects or need for scoping into the AA.</p>	<p>None.</p> <p>Mitigation identified in Screening Assessment: Policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution</p>
Chapter 10 Transport	AT3 (2)	MM38	<u>AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations.</u> All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	<p><u>AT3</u>: Policy makes provision for cycling infrastructure.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 10 Transport	10.10.1	MM39	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. <u>A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.</u>	AT3: as above.	As above.
Chapter 10 Transport	10.10.2	MM40	<u>10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.</u>  <i>Existing wording in 10.10.2 to move to 10.10.3, etc.</i>	AT3: as above.	As above
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area <del>and its setting</del> . The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be <del>considered</del> <u>sought where appropriate</u> ;	<u>HE1</u> : Policy requires developments that affect heritage assets or their settings to be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. The policy also sets out criteria when development may impact a heritage asset but will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.	<u>HE1</u> : as above.	As above.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u> , townscape and skyline, <u>including their cumulative effects</u> .	<u>HE1</u> : as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study <u>and the Setting Study (where appropriate)</u> to understand their site's significance and the key attributes of significance they should consider	<u>HE1:</u> as above.	As above
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	11.3.8 On sites where significant archaeological artefacts <u>or features</u> are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.	<u>HE2:</u> Policy seeks to conserve and enhance the City's archaeology and ancient monuments and will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted.</u>	<u>HE3:</u> Policy seeks to conserve and enhance the Tower of London World Heritage Site and its setting and development proposals in the vicinity of the Tower of London World Heritage Site are encouraged to enhance pedestrian and cycle routes. However, this policy itself will not result in development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>	<u>HE3:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	2. The tall building areas identified on the Policies Map and Figure 14 ( <u>City Cluster, Fleet Valley and Broadgate site</u> ) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	<u>S12</u> : Policy provides design requirements for the developments of tall buildings in respect of the City’s character and heritage, environment impact and with regard to assisting in the dispersal of air pollutants. The policy will not itself result in development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects both heritage significance and townscape character</u> , creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	8c. the significance of heritage assets and their <del>immediate and wider</del> settings.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	<del>For the purposes of Policy D9 of the London Plan, the</del> The tall buildings areas identified <del>as being appropriate locations for tall buildings</del> are the City Cluster, <del>and</del> Fleet Valley <del>and Broadgate Tall Building Site</del> areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new</u> tall buildings, <u>particularly on sites where there is no tall building currently</u> , would be likely to <u>have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	11.5.6 The heights of the buildings in the City Cluster, <del>and</del> Fleet Valley <del>and Broadgate Tall Building site</del> areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. <del>Both These</del> areas were assessed based on <del>specific criteria, including the London Views Management Framework (LVMF), St Paul’s Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.</del>	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	<i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i>	<u>S12</u> : as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u> , townscape and skyline, <u>including their cumulative effects</u> .	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	<i>New paragraph after 11.5.12 (and renumber after)</i>  <u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u>	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	<i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i>	<u>S12</u> : as above.	As above
Chapter 11 – Heritage and Tall Buildings	S13	MM57	2. Protecting and enhancing significant local views of St. Paul’s Cathedral, through the City Corporation’s St. Paul’s Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;	<u>S13</u> : Policy seeks to conserve protected views and will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems. This can</u> <del>Can</del> take many forms and require careful design, installation and regular maintenance.	<u>OS2</u> : Policy sets requirements for urban greening to be delivered as part of new development, including the installation of biodiverse extensive or intensive features.  No likely potential effects or need for scoping into the AA.	None.



Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 13 Climate Resilience	S15	MM59	<p><u>Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.</u></p> <ol style="list-style-type: none"> <li><u>1. Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;</u></li> <li><u>2. Development must address the impacts of the urban heat island effect;</u></li> <li><del>2.</del> <u>3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;</u></li> <li><del>3.</del> <u>4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and</u></li> <li><del>4.</del> <u>5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.</u></li> </ol>	<p><u>S15:</u> Policy sets out design requirements for development to adapt and be resilient to climate change and flood risk.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 13 Climate Resilience	13.1.2-3	MM60	<p><u>13.1.4 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u></p> <p><u>13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u></p>	<u>S15:</u> as above.	As above
Chapter 13 Climate Resilience	CR1	MM61	<p><del>2. Building designs should minimise any contribution to the urban heat island effect. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.</del></p>	<p><u>CR1:</u> Policy sets out design requirements for development to prevent overheating and urban heat island effects, including through the design of the building.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 13 Climate Resilience	13.2.2	MM62	<p><del>13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</del></p> <p><del>13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</del></p> <p><u>13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.</u></p>	<u>CR1:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	6. Ensuring development proposals have regard to the <del>immediate</del> setting of Bevis Marks Synagogue <del>(as set out in the Policy Map)</del> .	<u>S21</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.  No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>	<u>S23</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.  No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>	<u>S24</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.  No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	<u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u>	<u>S25</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.  No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u>	<u>S25</u> : as above.	As above
Chapter 15 Implementation	Policy S26	MM68	<u>(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.</u>  <i>Renumber parts 2 and 3.</i>	<u>S26</u> : Policy states that the City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development. As such, it will not itself lead to development.  No likely potential effects or need for scoping into the AA.	None.

## Stage 2: Review of Mitigation Measures within the Appropriate Assessment

The above stage 1 process has identified some main modifications to policies which have some ‘main’ or ‘smaller’ contributions to air quality or water quantity or quality and were ‘screened’ into the 2024 AA. These policies are shown below against the detail of the change in the Main Modification and whether these changes had any implications of the quantity of development to take place in relation impacts on air pollution or water quality and quality. This identified that the changes do not impact upon quantum. The mitigation measures previously identified in the AA are considered to remain appropriate, subject to no further changes in the approach to these within the MMs or AMs to the City Plan.

Policy	Air Quality	Water quantity or quality	Detail of change	Conclusion
S3: Housing		Main	Changes relate to the reporting of housing delivery and do not result in an increase in expected development. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain.  Stage 3: Review of the mitigation policies.
HS6: Student accommodation		Smaller	Changes relate to securing a nominations agreement with a higher education institution. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain.  Stage 3: Review of the mitigation policies.
S4: Offices	Main	Main	Changes relate to the measurement of office development and expectations for changes of use. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain.  Stage 3: Review of the mitigation policies.
CV4: Hotels	Main	Main	Change relates to acceptability of adverse impacts on residential amenity. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain.  Stage 3: Review of the mitigation policies
HL7: Sport and recreation	Smaller		Removal of reference to protection of ‘public’ sport and recreation facilities only. This change will not in itself lead to new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures identified for air quality in paragraphs 5.3 to 5.5 remain.  Stage 3: Review of the mitigation policies

### Stage 3: Review of the Mitigation policies identified in Appropriate Assessment against the Main and Additional Modifications

This stage involved review of the mitigation measures identified in the AA against the MMs and Ams to the City Plan. It identified that there were no changes to parts of the policy which include mitigation measures designed to address the impacts on air quality or water quantity and quality.

It therefore concludes that the conclusions of the Appropriate Assessment 2024 remain in light of the Main and Additional Modification to the City Plan.

Policy with mitigation	Air pollution mitigation	Water quality mitigation	Commentary in Appropriate Assessment of mitigation measures	MM or AM change
Policy HL5: Contaminated land and water quality		Yes	Paragraph 5.6: policy states “Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.”	No change to policy.
Policy CV4: Hotels	Yes		Paragraph 5.4 states policy requires that hotels must be in suitable locations with good access to public transport.	No change to this wording. Changes relate to unacceptable impacts only.
Policy VT2: Freight and Servicing	Yes		Paragraph 5.4 states policy requires that servicing areas are equipped with electric vehicle fast charging points. It also states that “Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.”	No change to policy.
Policy VT3: Vehicle Parking	Yes		Paragraph 5.4: States that “Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.” In addition, no new public car parks will be permitted and under-utilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points.	Change to this policy relates to the provision of electric charging points and does not change the approach to minimising car parking provision or prioritisation of existing car parking for other uses.  AM27 confirms that “ <u>In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.</u> ” This does not change the scope of the potential for air pollution as this is also covered by the London Plan policies E10 (H), T6.1 and T6.5.
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	Yes		Paragraph 5.4 states policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fueled vehicles and therefore air pollution	No change to this wording. Changes relate to opportunities to enable improved and new connections through to mainline railway stations.
Policy IN1: Infrastructure provision and connection		Yes	At paragraph 5.7: Policy provides measures that will reduce the requirement for water treatment and discharge associated with the Plan: “water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands.” And “Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and	No change to policy.

			greywater recycling, minimising discharge to the combined sewer network.”	
Policy CR3: Sustainable drainage systems (SuDS)		Yes	Paragraph 5.6: All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.” And “SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.”	No change to policy.
Strategic Policy S17: Thames Policy Area		Yes	Paragraph 5.6: character of the riverside will be enhanced by “Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.”	No change to policy.
Strategic Policy S19: Pool of London	Yes		Paragraph 5.4: states policy requires that car parking areas are removed upon redevelopment, within this policy area	No change to policy.

#### **Stage 4 Consultation responses**

The previous conclusion of the AA highlighted how HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. As part of the Regulation 19 consultation the HRA was subject to consultation with Natural England, as well as the Environment Agency, to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making. Neither of these bodies raised any specific comments or concerns in relation to the conclusion of the HRA.

