

City of London

Sustainability Appraisal

Appendix 3: Consultation Responses

Local Plan Review

Environmental Report

City Plan 2040 Revised Proposed Submission

January 2024



City Plan 2036 Integrated Impact Assessment Scoping Report

The City of London Corporation consulted on the scope of its Integrated Impact Assessment (IIA) incorporating Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). The following documents were sent to the statutory consultees between 11th January and 29th February 2016.

- SA Scoping Report
- Appendix 1 – Other plans and programmes
- Appendix 2 – Baseline information

Responses: Comments were received from the three statutory consultees – Natural England, Historic England and the Environment Agency. The City's response to these comments is recorded in the following table and will be reflected in the next iteration of the IIA at Issues and Options stage.

Date	Name	Organisation	Comment	City of London Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
10/02/16	Samantha Davenport Urban Habitats Senior Specialist	Natural England	Thank you for consulting Natural England on the Integrated Impact Assessment Draft Scoping Report. Our advice relates to our strategic environmental interests, including but not limited to statutory designated sites, landscapes and protected species, geology and soils. Having looked through the proposed scope of the Integrated Impact Assessment it appears that the key topic areas that Natural England would expect to be included have been scoped in and that the baseline data for these has been gathered to a good level of detail. The proposal to follow the methodology for SA is consistent with the approach that should be applied for such a document.	Comment noted No change needed
25/02/16	Graham Saunders Principal Advisor - London	Historic England	Relevant Plans programmes and policies – the review of the plans programmes and policies should consider those which will have a direct bearing on the historic environment. It is important that the review draws out the implications for developing the IIA objectives; and for the development plan and other types of plan. In some cases it might be appropriate to update and expand on an existing review undertaken for a higher level plan. In addition it is also useful to incorporate within the main body of the report a summary of the review and its main implications. It is noted that at present there is	Appendix 1 is a spread-sheet showing the implications of each plan or programme for the Local Plan and for the IIA assessment. Historic England's good practice advice notes have been added to appendix 1 and to the list in the main body of the report.

Date	Name	Organisation	Comment	City of London Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
			just a list of documents. In addition to this identified we would suggest that Historic England's good practice advice notes are included. (Web link: https://historicengland.org.uk/advice/planning/planning-system/)	

Further advice 29/06/16	Graham Saunders Principal Advisor - London	Historic England	Suggest adding the following other plans and programmes: Regional - include the <ul style="list-style-type: none"> • Mayor's Character and context SPG, and • CAZ SPG National – suggest inclusion of the <ul style="list-style-type: none"> • Good Practice Advice Notes HE has prepared on Local Plan Making (GPA1), • Managing Significance in Decision-Taking in the Historic Environment (GPA2) and • Setting & Views (GPA3). 	Additional suggested SPGs and advice notes have been considered in the assessment of other plans and programmes and added to Appendix 1: Regional - include the <ul style="list-style-type: none"> • Mayor's Character and context SPG, and • CAZ SPG National – suggest inclusion of the <ul style="list-style-type: none"> • Good Practice Advice Notes HE has prepared on Local Plan Making (GPA1), • Managing Significance in Decision-Taking in the Historic Environment (GPA2) and • Setting & Views (GPA3).
25/02/16	Graham Saunders Principal Advisor - London	Historic England	Baseline Information – We recommend that the baseline information is tailored to the scale, type and topic of the development plan and is proportionate to the area. It is important to ensure that the information is both quantitative and qualitative, is up to date and describes the current and future likely state of the historic environment. This provides the basis for: <ul style="list-style-type: none"> • Identifying sustainability issues; • predicting and monitoring effects; and • identifying alternative solutions The baseline information at the moment is relatively limited in its value, in that it focusses on the number of designated heritage assets, their type, and through a map its geographical spread. Although the number of heritage assets at risk are mentioned there is no further qualitative or conditional information provided concerning the wider historic environment and all heritage assets.	The following two paragraphs have been added to the baseline information <u>8.4 The City Corporation has published a series of Conservation Area Strategies and management plans as Supplementary Planning Documents (SPDs) which provide information on the significance of heritage assets and their condition. These SPDs are published on the City Corporation's web site.</u> <u>8.5 There are numerous non designated heritage assets in the City which merit consideration in planning decisions.</u>
25/02/16	Graham Saunders Principal Advisor - London	Historic England	Baseline information - We would also advise that a wider geographic area is considered, in order to assess the likely significant environmental effects on the historic environment and heritage assets (e.g. Tower of London WHS) resulting from the Local plan that may have cross boundary implications (e.g. tall buildings, transport improvements and infrastructure).	Add the following paragraph to the baseline information <u>8.3. Development in the City may have an impact on heritage assets beyond the City's boundaries in the neighbouring boroughs of Tower Hamlets, Islington, Camden, Westminster, Southwark and Lambeth and beyond. Details of these assets can be found on the Historic England web site or through individual borough's web sites. The Tower of London World Heritage site is of particular importance in this context.</u>

25/02/16	Graham Saunders Principal Advisor - London	Historic England	<p>Sustainability Issues and Problems – Analysis of a comprehensive range of sources of baseline information for the historic environment is essential in order to help identify sustainability issues related to the historic environment. It is important to demonstrate an understanding of the contribution of the historic environment to sustainable development and its role in delivering wider social, cultural economic and environmental benefits. For example, heritage led regeneration can provide opportunities for sustainable tourism, leisure and recreation activities, and help strengthen the character of a place. From the details provided we would suggest that the issues for the City of London are not just limited to its heritage assets, but the wider historic environment and other heritage assets beyond the boundaries of the City.</p>	<p>Add the following paragraph to the Sustainability Issues and problems section recognising the need to consider the key issue of pedestrian movement on heritage assets and landscapes:</p> <p><u>8.6.2. The heritage assets within the City form part of a wider network of listed buildings and conservation areas, which illustrate London's rich history, extending into neighbouring boroughs and beyond. The Local Plan must respond to the future plans for cultural and heritage assets within and outside the City for example considering the impact of increased visitor numbers and access routes through the City. Development within the City must not detract from the historic significance and setting of assets elsewhere. Of particular importance in this context is the Tower of London World Heritage Site which lies just beyond the City's boundary to the east.</u></p> <p><u>8.6.3 The proposed Cultural Hub in the north of the City must be carefully planned to enable appropriate new uses for heritage assets in the Smithfield and Barbican areas.</u></p>
25/02/16	Graham Saunders Principal Advisor - London	Historic England	<p>IIA Framework – First the objective and supporting criteria for "Heritage Assets" should take account of the concepts of significance and settings, as set out by Government's national policy (NPPF). In addition it is important to ensure that the relationship between the topic areas is assessed sufficiently e.g. between heritage assets, open space and economic growth. In addition it is essential to ensure all forms of impacts are considered including direct, indirect and cumulative.</p>	<p>Change wording of objective 4 to read To conserve or enhance the significance of heritage assets and their settings and enabling public appreciation and access wherever possible.</p> <p>And expand the criteria to specify the significance of heritage assets noting that their settings are already addressed within this criterion: Will the policy conserve or enhance the significance of heritage assets (listed buildings, conservation areas, historic street furniture, scheduled monuments, historic parks and gardens, historic trees, world heritage sites and archaeological remains) and their settings in and around the City?</p> <p>Paragraph 10.4 will be amended to read: Comments will be included to highlight the significant effects of the policy options in terms of direct or indirect effects, whether effects are permanent or temporary, cumulative impacts and timescales. (Short term 1-3 years, medium term 3-10 years, long term more than 10 years).</p>

29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	<p>Section 4. Stage A1 Other Plans and programmes</p> <p>The following plans and programmes should also be considered: <i>Environment Agency strategies, plans and evidence:</i></p> <ul style="list-style-type: none"> • Thames River Basin Management Plan • London borough factsheets 2013 (State of the Environment Reports) • Groundwater protection: principles and practice 2012 (GP3) • (Baseline data)- datasets available from DEFRA agencies including Environment Agency, natural England, Forestry Commission and Canals and Rivers Trust 	<p>The following plans have been added to the list of other plans and programmes and to the other plans and programmes spread-sheet:</p> <p>Thames River Basin Management Plan 2015 London borough fact sheets City of London Environmental data Groundwater protection: principles and practice</p>
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	<p>Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 5 Waste management. We support the inclusion of an objective on waste management; however, we would like to see the following additions to the criteria:</p> <ul style="list-style-type: none"> - <u>Will the policy encourage the transport of materials by rail or river where possible?</u> - <u>Will the policy safeguard existing wharves, particularly Walbrook Wharf, which at the moment has some spare capacity due to falling residual waste tonnages?</u> - <u>Will the policy reduce the overall waste arising per capita?</u> 	<p>Add the following criteria to objective 5 Waste management:</p> <p><u>Will the policy encourage the transport of materials by rail or river where possible?</u> <u>Will the policy safeguard existing wharves, particularly Walbrook Wharf?</u> <u>Will the policy reduce the overall waste arising per capita?</u></p>
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	<p>Within this objective or at a later stage in the plan, we would also like to see the following addressed –</p> <ul style="list-style-type: none"> - A requirement for developments to have a site waste management plan looking at all of the construction outputs and also addressing the post construction collection of waste materials. - Some kind of policy or action plan for construction, demolition and excavated materials (CDE) wastes is essential as looking at data for the City of London (CoL), the tonnage has gone up dramatically recently and likely future trends for development mean that it could remain high for some considerable time - It would be good to mention hazardous waste as there are no facilities in the City of London. 	<p>Objective 5 Waste Management includes criteria to assess whether policies will reduce construction and deconstruction waste. An additional criterion has been added as follows:</p> <p><u>Will the policy reduce hazardous waste arisings from the City?</u></p>

29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 6 – Environmental Protection We support the inclusion of an objective in Environmental Protection. However it needs to address the issue of urban diffuse pollution which has been identified through the Water Framework Directive (WFD) and the Thames River Basin Management Plan (RBMP) as being a particular issue in the CoL. There is a duty on all Public Bodies (including Local Authorities) to have regard to the WFD and the recommendations from the Thames RBMP and the addition of the suggested criteria below would go some way to achieve the recommendations of the RBMP. We recommend that the following is included as a criteria: - <u>Will the policy improve water quality by reducing diffuse urban pollution?</u>	Add the following criterion to Objective 6 Environmental Protection: <u>Will the policy improve water quality by reducing diffuse urban pollution?</u>
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 7 – Climate change mitigation and resilience We support the inclusion of an objective on Climate change mitigation and resilience and its specific link to the Thames Estuary 2100 Plan. To make the criteria more specific, we would like to see it amended to read - <i>Will the policy assist in reducing vulnerability <u>to flood risk within and</u> beyond the City(e.g. by supporting the TE2100 plan)</i>	Amend criterion for Objective 7 to read: <i>Objective 7 - Climate change mitigation and resilience.....</i> <i>Will the policy assist in reducing vulnerability <u>to flood risk within and</u> beyond the City(e.g. by supporting the TE2100 plan)</i>
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	The CoL has areas of tidal flood risk from the River Thames to the south and areas of surface water flood risk. We would therefore expect the Integrated Assessment to include the reduction of flood risk as a key sustainability issue	Amend paragraph 8.3 to refer to flood risk 8.3. Soil and water quality, water resources and <u>flooding risk</u> 8.3.1. The City's Strategic Flood Risk Assessment (SFRA) identifies that limited areas of the City are at risk of <u>river, surface water and sewer</u> flooding, however climate change could alter the current risk.
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	The CoL is different to most local authorities in that you traditionally struggle to attract much Grant in Aid funding for flood defence schemes due to low partnership funding scores owing to having relatively few residential properties at risk. Therefore using developers to part fund projects is the preferred route. You would benefit from identifying areas that are most at risk or flood most frequently and work up some schemes so that if/ when development is proposed in the same area, which would also benefit from defences, you are more prepared with their partnership project to approach developers.	The adopted Local Plan Policies map identifies the City Flood Risk Area where development proposals must address the risk of flooding. Policy 18.1 (3) includes a requirement to provide protection from flooding beyond the site boundaries, where feasible and viable. Implementation of the City of London Local flood risk management Strategy includes an action to prepare flood risk management plans for Farringdon Street, Paul's Walk and Victoria Embankment which are the main areas at risk of flooding in the City. No change needed

29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	<p>We would also like to see a criteria included on the efficient use of water resources. CoL is within Thames Water London Water Resource Zone which is classified as 'seriously water stressed'. Average water use in the CoL in 2010-2011 was 166.5 litres per head per day (l/h/d) which is above the England and Wales average of 148 l/h/d. Inefficient use of water can lead to unnecessary carbon emissions. We suggest the following criteria is included:</p> <ul style="list-style-type: none"> - <u>Will the policy make efficient use of water resources and reduce demand on these resources</u> 	<p>Amend Objective 6 to read: Objective 6 Environmental protection Air quality, water quality <u>and resources</u>, land contamination, light & noise..... <u>Will the policy make efficient use of water resources and reduce demand on these resources</u></p>
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	<p>Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 9 Biodiversity and Urban Greening.</p> <p>We support the inclusion of biodiversity and urban greening as an objective.</p> <p>We would like to see the Biodiversity Action Plan (BAP) species/habitat targets extended and made more specific. As well as monitoring the overall amount of green space and green roofs, you could monitor what proportion /area is positively managed for biodiversity. In this way you can determine how good the green infrastructure network is for plants, pollinating insects etc., and what you could do to improve this, either by altering the design of existing spaces or seeking new spaces, green roofs or green walls through development.</p> <p>We would also like to see assessed the availability of structures for birds to roost on (undisturbed) that could utilise the estuary.</p> <p>To address the above points, we would like to see the following criteria included:</p> <ul style="list-style-type: none"> - Will the policy increase protection and improve opportunities for biodiversity <u>in particular <list specific BAP species/targets></u> - <u>Will the policy lead to positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?</u> - <u>Will the policy increase the availability of structures for birds to roost on (undisturbed) that can utilise the estuary.</u> 	<p>Amend Objective 9 to read: Objective 9 Biodiversity and Urban Greening Habitats and species, Natura 2000 sites outside the City. Will the policy increase protection and improve opportunities for biodiversity <u>in particular black redstarts, sparrows, bats and stag beetles?</u> Will the policy affect <u>enhance</u> the River Thames as a Site of Metropolitan Importance for Nature Conservation (<u>e.g. through the provision of roosting structures for birds and bats?</u>)? Will the policy affect any other Sites of Importance for Nature Conservation? Will the policy protect existing trees and increase tree planting? Will the policy increase green roofs, green walls and soft landscaping <u>and lead to their positive management for biodiversity?</u> Will the policy affect any Natura 2000 sites?</p>

29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	Section 10 Stage A4 Integrated Impact assessment Framework, Table 1 Objectives & Criteria, Objective 13 Health In respect of air quality, we have no processes which we regulate in the CoL and as the report recognises the air quality problems are due to transport emissions within and around the CoL, so strictly speaking not within the Environment Agency's remit but we do work closely with all boroughs, the GLA and TfL on air quality plans in support of the Mayor's London Air Quality Strategy. The baseline document fully recognises that the City air quality can be poor with exceedences of NO2 and PM10. However the CoL has robust air quality action plan and is a leader in London on initiatives to reduce emissions by encouraging walking /cycling/public transport through working with businesses in the CoL such as CityAir see http://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Pages/city-air.aspx The CoL is also influenced by and will benefit from improvements in emissions achieved through Mayoral initiatives and policies such as Air Quality Neutral the Ultra Low Emission Zone and bus and taxi improvement programmes as well as its own policies but again as the documents identify, this is a London wide issue which the CoL can only influence to a limited degree until traffic is appropriately controlled and /or low/ zero emission.	Comment noted No change needed
29/02/16	Deborah Simons Planning Specialist Sustainable Places	Environment Agency	Additional Information Please find enclosed a briefing document on the TE2100 plan produced specifically for the City of London in April 2015. This introduces the TE2100 plan and explains its requirements and provides ideas how flood risk management can be integrated with other objectives to deliver a well- planned riverside.	Comment noted No change needed

City Plan 2036 Issues and Options Integrated Impact Assessment

As part of the City Plan 2036 Issues and Options consultation (19th Sept 2016 – 31st Oct 2016) the following documents were published for comment:

- [Integrated Impact Assessment Scoping Report \(2MB\)](#)
- [Scoping Report Appendix 1 – Other plans and programmes \(230KB\) CSV](#)
- [Scoping Report Appendix 2 – Baseline information \(2MB\)](#)
- [Scoping Report Appendix 3 – Consultation Responses \(185KB\)](#)
- [Integrated Impact Assessment Commentary Document \(2MB\)](#)

Responses: Comments were received from two statutory consultees - the Environment Agency and Historic England. The City's response to these comments is recorded in the following table and will be reflected in the next iteration of the IIA at draft City Plan 2036 stage.

Date	Name	Organisation	Comment	City of London Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
18/11/16	Keira Murphy	Environment Agency	Thank you for taking into account our previous comments at the scoping stage of the IIA. We welcome the changes you have made to the IIA report to the criteria questions for objectives on waste management, environmental protection, climate change and biodiversity and urban greening. There is also the opportunity to use the current WFD status of the New River and Thames (Middle) as an indicator for water quality or biodiversity. Both are currently achieving moderate status. The water body summary reports I've enclosed specify the reasons for not achieving good, and list the draft action measures required to achieve good status by 2027.	The draft SA Scoping Report appendix 2 baseline information has been amended to include the current WFD status for the Thames (Middle) and proposed measures required to achieve good status by 2027 have been noted. The WFD status of the New River has not been included since it does not flow through the City and there are no actions proposed within the City to improve its status.
02/12/16	Graham Saunders	Historic England	In our response to this version of the IIA Scoping Report, we draw your attention to our letter (dated 25th February 2016) in response to the previous iteration of the IIA Scoping Report as published in January 2016. For example issues not yet addressed include: <ul style="list-style-type: none"> • Baseline – commentary on the condition of heritage assets in the City there are a small number of assets on Historic England's Heritage at Risk Register (2016) (e.g. 1 listed building, 3 Places of Worship and 3 Schedule Monuments). • Compatibility Matrix – where the commentary on the relationship between heritage and economic growth objectives is ambiguous, yet on the matrix it is marked as a 'x', which suggests conflict. Greater clarity is needed. 	The draft SA Scoping Report appendix 2 baseline information paragraph 8.3 has been added providing details of the condition of heritage assets that are "at risk" in the City. The compatibility matrix has been amended to indicate uncertainty regarding the impact of heritage assets on economic growth. Further monitoring is underway to determine the impact of heritage status on planning permissions.

Draft City Plan 2036 Integrated Impact Assessment

As part of the consultation on the draft City Plan 2036 (Nov 2018) the following documents were published:

- [Integrated Impact Assessment \(1.2MB\)](#)
- [Appendix 1 - Other plans and programmes \(293KB\)](#) (xls)
- [Appendix 2 - Baseline information \(2.4MB\)](#)
- [Appendix 3 - Consultation responses \(196KB\)](#)
- [Appendix 4 - Commentary \(511KB\)](#)
- [Appendix 5 - IIA assessments \(647KB\)](#)
- [Appendix 6 - Policy stories \(837KB\)](#)
- [Appendix 7 - Audit statement \(143KB\)](#)

No comments on the Integrated Impact Assessment were received.

Proposed Submission City Plan 2036 Integrated Impact Assessment

As part of the consultation on the Proposed Submission City Plan 2036 (March 2021) the following documents were published:

- [Integrated Impact Assessment \(1.2MB\)](#)
- [Appendix 1 - Other plans and programmes \(124KB\)](#) (xlsx)
- [Appendix 2 - Baseline information \(5MB\)](#)
- [Appendix 3 - Consultation responses \(200KB\)](#)
- [Appendix 4 - Commentary \(511KB\)](#)
- [Appendix 5 - IIA assessments \(Draft City Plan 2036\) \(700KB\)](#)
- [Appendix 6 IIA assessments \(Proposed Submission City Plan 2036\) \(800KB\)](#)
- [Appendix 7 - Policy stories \(500KB\)](#)
- [Appendix 8 - Audit statement \(100KB\)](#)

No comments on the Integrated Impact Assessment were received.

City Plan 2040 Sustainability Appraisal Scoping Report

The City of London Corporation re-consulted on the scope of its Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), formerly referred to as the IIA, as a result of the time that passed since the IIA was last consulted upon in March-May 2021. The following documents were sent to the statutory consultees between 21st August and 22nd September 2023.

- SA Scoping Report
- Appendix 1 – Other plans and programmes
- Appendix 2 – Baseline information

Responses: Comments were received from two statutory consultees - the Environment Agency and Historic England. The City's response to these comments is recorded in the following table and will be reflected in the next iteration of the SA at Revised Proposed Submission City Plan 2040 stage.

Date	Name	Organisation	Comment	City of London/LUC Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
29/09/23	Molly Dadswell – Sustainable Development Lead Adviser	Environment Agency	Natural England has no specific comments to make on this Sustainability Appraisal and Baseline information request.	Noted.
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	In terms of the historic environment, we consider that the Report has identified the relevant plans and programmes which are of relevance to the development of the local plan and that it has established an appropriate Baseline to establish an overall picture of the current state of the borough's historic environment.	Support noted.
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout its preparation. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; and the nature and design of any required mitigation measures.	The City Corporation's Design and Conservation Team is working closely with the Policy Team on the Local Plan and has contributed towards preparation of the Sustainability Appraisal.
22/09/23	Tim Brennan – Historic Environment	Historic England	Sustainability issues: We note the sustainability issues relating to heritage assets at page 19 – we would suggest that this section should be re-titled historic environment to better reflect current	The SA Scoping Report will not be re-consulted upon but the baseline information has been updated where appropriate to reflect this comment.

Date	Name	Organisation	Comment	City of London/LUC Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
	Planning Adviser		<p>terminology and National Planning Policy Framework (NPPF) language. In addition, we do not consider that this section as currently set out gives an accurate picture in relation to the historic environment element of sustainable development. Intense development pressure clearly has significant implications for both individual heritage assets and wider historic character. This section could better draw on enhanced baseline information to more accurately identify how this development pressure could have adverse effects on heritage significance, and conversely how it could bring about opportunities for conservation and enhancement.</p> <p>In particular, we do not consider that the Scoping Report adequately covers the issue of incremental and cumulative change to the historic environment. The City of London is distinctive in a number of ways, but one of them is the way the dynamic development context creates ongoing effects to heritage significance and character. This is particularly true of new tall building proposals, with their inter-relationship and subsequent changes to the skyline having effects on individual assets some of which are of international importance. The scoping report needs to specifically reference this issue (perhaps at para 6.29) with an associated question within the draft framework.</p>	<p>In Appendix 2 (Baseline Information), the heading 'Context and baseline – heritage assets' has been replaced with 'Context and baseline – historic environment'. Using the City's Tall Buildings Sensitivity Analysis, which provides a comprehensive and extremely detailed review of the City's heritage, we have added to and enhanced the baseline information in the SA, including adding further text on the development pressures faced by the City, which could have implications for both individual heritage assets and the wider historic character. We do not consider it proportionate in an SA of a Local Plan to provide detail on each individual asset and so have focused on the Strategic Landmark Heritage Assets (St Paul's Cathedral, the Monument and the Tower of London) and their vulnerabilities to tall buildings.</p> <p>The 'Cumulative effects' section of the SA considers the overall effects of the Local Plan, including on the historic environment.</p>
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	<p>Sustainability issues: We also note the following text at para 6.28:</p> <p><i>Pressure for development is intense therefore it is important that these heritage assets contribute to the functioning of the City, through the conversion of underused space to satisfy commercial or social needs.</i></p> <p>Notwithstanding the following sentence that qualifies this with a reference to not detracting from significance, this text should be clarified to be clear that there should be no pressure for change of use without appropriate consideration of the effects on significance.</p>	<p>The SA Scoping Report will not be re-consulted upon but the baseline information has been updated, where appropriate, to reflect this comment.</p> <p>In Appendix 2 (Baseline Information), the following paragraph has been added:</p> <p><u>Due to the intense pressures for development, it is important that the City's heritage assets contribute to the functioning of the City through the conversion of underused space to satisfy commercial or social needs, after appropriate consideration of the effects of potential conversion on significance.</u></p>
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	<p>Sustainability Appraisal Framework: As indicated above, the framework needs to capture the important issue of incremental and cumulative change and its effects on the historic environment. We would therefore suggest a further criterion be added to objective 4:</p>	<p>The SA appraises each policy separately, while the 'Cumulative effects' section of the SA looks at the overall effects of the Local Plan, including on the historic environment. As the suggested criterion looks at cumulative effects, we have not added this criterion</p>

Date	Name	Organisation	Comment	City of London/LUC Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
			<p><i>Will the policy conserve or enhance the historic environment and historic character through addressing any cumulative adverse impacts through separate development proposals?</i></p> <p>We note objective 4 current contains no reference to historic or townscape character, one of the key attractions of the City of London. We recommend that objective 4 should include reference to this.</p>	<p>under SA objective 4. We have, however, added reference to historic and townscape character under criterion 4.4:</p> <p><i>Will the policy protect the historic and townscape character, including views of historically important landmarks and buildings?</i></p>
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	<p>Sustainability Appraisal Framework: The historic environment is clearly a cross-cutting topic in that while the Local Plan will have heritage-specific policies, other policy areas also have potential implications for it. For example, inappropriate measures to improve energy efficiency on historic buildings can affect heritage significance, a substantial element of the City's housing stock is listed in the form of the Barbican and Golden Lane estates while increased public transport usage can put pressure on historic areas and buildings. As such, it would be more effective if there were references to potential impacts on the historic environment in relation to objectives 2 (built environment and public realm), 7 (climate change mitigation and resilience), 8 (open spaces), 10 (transport and movement) and 11 (housing).</p> <p>Further to this, we would suggest that the housing and historic environment objectives should be cross-referenced and assessed in the compatibility matrix on page 40.</p>	<p>We do not propose adding references to potential effects on the historic environment to SA objectives 2 (built environment and public realm), 7 (climate change mitigation and resilience), 8 (open spaces), 10 (transport and movement) and 11 (housing). Just as the Local Plan needs to be read as a whole rather than referring to cross-cutting issues within every policy that provides for development (such as the need to conserve and enhance the historic environment), so the SA objectives that provide the framework for the appraisal need to be considered as a whole. Taken together, the set of SA objectives is designed to be exhaustive but individually they are designed to avoid overlap as much as possible, to help avoid duplication of assessment findings, in what are already long and complex assessment reports. Every plan policy is individually assessed against all SA objectives and interactions between the effects of different elements of the plan are considered in the cumulative effects section of the SA</p>
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	<p>Baseline information: We note the baseline information within section 8 of Appendix 2, which is fine as far as it goes. However, as referred to above, we would suggest that there should be a more comprehensive review of both the assets themselves and their current condition together with greater analysis of the likely impacts of identified sustainability issues. This could replace the section currently title 'progress against previous SA objective' which does not give any meaningful insight into how the situation has changed since the last SA appraisal. Greater linkages with the sustainability issues covered in the main report is also required. We would also question why in paras 8.7 and 8.9 consideration of relevant schemes ends in 2020, rather than being up to date.</p>	<p>The heading 'Progress against previous SA objective' should remain as it is, for consistency throughout the report. It is not considered appropriate or proportionate to provide a review of each existing asset within the City.</p> <p>The consideration of relevant schemes at paragraphs 8.7 and 8.9 ends in 2020, as this is the most up-to-date information available.</p>

Date	Name	Organisation	Comment	City of London/LUC Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
22/09/23	Tim Brennan – Historic Environment Planning Adviser	Historic England	<p>Baseline information: Finally, we consider that the SA should also set out indicators to enable understanding over the Plan period as to the effects on the historic environment. These could include:</p> <ul style="list-style-type: none"> • The number and condition of heritage assets on the Heritage at Risk register • The proportion of conservation areas with up to date appraisals and/or management plans 	<p>The number and condition of heritage assets on the Heritage at Risk register is set out in the table under paragraph 8.3.</p> <p>We have added the following text regarding the conservation areas:</p> <p><u>The City of London currently has 27 conservation areas. The Corporation has produced or intends to produce a Character Summary and Management Strategy, a Supplementary Planning Document (SPD), for each conservation area. The SPD for each conservation area identifies and analyses the area's principal characteristics, explains its significance and provides detailed guidance on the City's planning policies. If an SPD has not yet been prepared, there is a separate Character Summary and Management Strategy.</u></p>
22/09/23	Imogen Nayager- Stafford - Planning Specialist	Environment Agency	<p>Open spaces and biodiversity</p> <p>Pollinator strategy: We are pleased to see that the baseline information has identified that opportunities for biodiversity have increased through the development of green roofs and walls, and that Objective 9 'Biodiversity and urban greening' includes the question 'Will the policy increase green roofs, green walls and soft landscaping and lead to their positive management for biodiversity?' in its criteria.</p> <p>The vast shift we have made into large-scale, industrial and more intensive farming practices over recent decades has caused the health and quantity of wildflowers to be drastically reduced. Tragically, we have lost 97% of the UK's wildflower meadows since the 1930s. The plan should aim to incorporate a robust pollinator strategy to support our native bees through the provision of native wildflower areas. These could be incorporated into green and brown roofs as part of a sustainable urban drainage scheme. The provision of SuDS in addition has the potential to reduce contaminants discharging into the Thames.</p>	<p>Support noted.</p> <p>With regard to the development of a pollinator strategy, the Corporation's attention is drawn to this comment as it relates more specifically to the Local Plan than it does the SA.</p>
22/09/23	Imogen Nayager- Stafford - Planning Specialist	Environment Agency	<p>Open spaces and biodiversity</p> <p>Wildlife: We support the SA Opinions recognition (p. 6.17) that while the borough is densely developed, open spaces 'provide pockets of space for wildlife, forming corridors for the movement of species'.</p>	<p>Support noted.</p>

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			<p>We would like to emphasise on the importance of ecological networks of linked habitat corridors (both within the Borough and linking to adjacent Boroughs) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the National Planning Policy Framework and the Local Nature Recovery Strategy commitment of the government's 25 year Environment Plan and enacted by the Environment Act 2021.</p>	
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Soil and water quality, water resources and flood risk Water resources: There are significant water resources challenges facing London. Multiple organisations have roles and responsibilities to respond to these challenges. We would strongly encourage and support the City of London Corporation in their responsibilities detailed in Section 83 of the Water Act 2003 to conserve water. This can be done by supporting the efficient use of water and maintaining the profile of this key issue through its powers in the regulatory planning framework.</p> <p>We welcome the specific reference to the City facing high water stress (paragraph 6.21, page 18). We also welcome water resources being defined in the criteria for delivering Objective 6 (criteria 6.4, page 30). We would therefore recommend that the current description of water conservation in paragraph 6.21 (page 18) be changed to reflect the SA's objective criteria. Currently, water conservation is described as an 'important consideration' (paragraph 6.21, page 18). We suggest that it instead be described as a key objective criterion.</p> <p>While we acknowledge that the City must adhere to the London Plan, we observe that all neighbouring London borough plans (Camden, Islington, Hackney, Tower Hamlets and Westminster) have stated specific water consumption targets (even where they match those set in the London Plan). Clearly defined water consumption targets ensure that water efficiency remains a priority of all developments. This is particularly important in central London boroughs, where most potable water is imported from outside of local authority jurisdictions. Current water use by Thames Water customers is 32% higher than that targeted by the London Plan. We would therefore support the SA in asking the City Plan to state a specific per-head water consumption target.</p>	<p>It is not the purpose of the SA Scoping Report to state what should and should not be included in the Local Plan (e.g. per-head water consumption targets) but the Corporation's attention is drawn to these recommendations. Instead, the SA provides an appraisal of the content of the Local Plan.</p> <p>The SA Scoping Report will not be re-consulted upon but the baseline information has been updated, where appropriate, to reflect this comment.</p> <p>SA objective 6 outlines the criteria against which the policies will be appraised with no specific reference to residential development. It is therefore not considered necessary to add reference to commercial development. The objective and its criteria apply to all types of development.</p>

Date	Name	Organisation	Comment	City of London/LUC Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
			<p>Noting the high ratio of commercial to residential buildings in the City, we would support specific considerations for commercial buildings being added to the criteria for Objective 6 (page 30). Many local plans specify the need to achieve 'excellent' BREEAM standards for commercial developments. However, this can be achieved without necessarily delivering high water efficiency (an 'excellent' rating is given to an overall building sustainability score of 70-84%). Given the high water stress situation, we would strongly encourage the SA to seek a policy requiring commercial buildings to achieve a BREEAM 'excellent' rating in the water categories (WAT01-04). This ensures that water efficiency remains a central component of any commercial/major development and that it cannot be masked by other efficiency gains (e.g. energy efficiency).</p>	
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Soil and water quality, water resources and flood risk Combined sewer overflows: We welcome the understanding that the Thames Tideway Tunnel will serve the City via the Blackfriars CSO, and we also welcome the understanding that CSO discharges are related to the volume of water entering the sewer system (paragraphs 6.16 and 6.20-21, pages 17 and 18). However, the Thames Tideway Tunnel project is alleviating the symptoms of an over-pressured sewer system by reducing the frequency of CSO discharges. We would encourage the SA and City Plan to acknowledge that the Corporation can play a role in mitigating the causes of CSO discharges.</p> <p>CSO discharges are triggered when flow in the sewers exceeds that which sewage treatment infrastructure can manage and should only operate during significant rainfall events. By reducing the rate of urban run-off, local authorities can reduce the quantity of rainfall reaching the sewers and increase the volume of sewage the infrastructure is able to process. Surface water management is highlighted by the Thames Water Catchment Strategic Plan as the preferred measure by which drainage can become more manageable and represents a key element of the Beckton System that the Thames Tideway Tunnel will be a part of. Consequently, we would encourage the SA to assess the City Plan for proactive attempts to improve the City's surface water management, such as by reducing the volume and rate of surface water reaching the sewers.</p>	<p>The SA Scoping Report will not be re-consulted upon but the baseline information has been updated, where appropriate, to reflect this comment.</p> <p>In Appendix 2 (Baseline Information), the following paragraph has been added:</p> <p><u>The Thames Tideway Tunnel will alleviate the symptoms of an over-pressured sewer system by reducing the frequency of CSO discharges. A reduction in surface run-off in the City would form a proactive contribution to addressing the pressure of combined sewer overflow discharges on the Thames Middle waterbody.</u></p>

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22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Soil and water quality, water resources and flood risk SuDs:</p> <p>We welcome the acknowledgement of SuDS as a means of making better use of water resources (paragraph 6.21, page 18). We also welcome the mention of SuDS in Objective criterion 6.7 (page 30) as a strategy for reducing wastewater volume and decreasing the risk of sewer flooding and suggest the Objective criteria mentioning SuDS should be expanded to include reference to water use/resources. There are different uses of SuDS, taking different forms and delivering different results. The recycling of rainwater, for example, can decrease the consumption of potable water, while permeable paving can improve the rate and quality of surface run-off. We recommend therefore that the SA appraises the City Plan for a comprehensive presentation of different SuDS options. We would be very supportive of the need for a SuDS hierarchy in the City Plan, as in the London Plan, as well as a clarification of what interventions are most appropriate for the City. We would also support the SA to evaluate whether any proposed SuDS outcomes can continue to be delivered over a period of time. The City Plan should therefore be assessed for planned management of SuDS schemes.</p> <p>We note that the retrofitting of existing buildings has been made a criterion of Objective 7 (page 31) as means of reducing carbon emissions. We would support similar criteria being added to Objective 6 (page 30). Significant water resources gains can be made by retrofitting. Retrofits could be the adding of SuDS systems, and/or installing greywater recycling, and/or altering existing fittings (e.g. aerated taps, etc). Such interventions can decrease both water consumption and quantities of water reaching the sewers. Given the high urban density of the City and its significant existing building stock, we suggest that retrofitting should be an important criterion for the SA's Objective 6 (page 30).</p>	<p>Criterion 6.7 has been amended as suggested:</p> <p><i>Will the policy reduce waste water volumes and the risk of sewer flooding so as to protect water resources, for example through the use of SuDS?</i></p> <p>If the City Plan contains different SuDS options, these will be appraised in the SA.</p> <p>The purpose of SA objective 6 is to maximise protection and enhancement of the natural environment, not to reduce carbon emissions (SA objective 7 seeks to mitigate climate change which involves reducing carbon emissions). It is therefore not considered necessary to add a criterion on reducing carbon emissions to SA objective 7, as this would duplicate assessment findings.</p>
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Climate change mitigation and adaptation</p> <p>Climate Change: The City of London has declared a climate emergency and have a 'Climate Action Strategy' in place. We expect to see actions from the 'Climate Action Strategy' embedded in the SA Scoping Opinion to deliver climate resilience.</p>	<p>The Climate Action Strategy has been referred to in Appendices A (Other Plans and Programmes) and B (Baseline Information).</p>

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22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Climate change mitigation and adaptation Flood Risk and the Thames Estuary 2100 Plan: We expect to see aims from the City of London's Riverside Strategy reflected in the Sustainability Appraisal, such as raising and improving flood defences, maintaining and improving access along the entire length of the riverside and alignment with the Thames Estuary 2100 Plan (TE2100).</p>	<p>The Flood Risk and the Thames Estuary 2100 Plan has been referred to in Appendix A (Other Plans and Programmes).</p> <p>The SA Scoping Report will not be re-consulted upon but the baseline information has been updated, where appropriate, to reflect this comment.</p> <p>The following paragraph has been added to Appendix 2 (Baseline Information):</p> <p><u>The City of London's Riverside Strategy (2021) outlines the management of river flood defences within the Square Mile. The strategy offers a framework for enhancing and elevating flood defences, as well as for the continual enhancement of accessibility along the entire riverside, while also aligning with the Thames Estuary 2100 Plan (TE2100).</u></p>
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>In April 2023 the TE2100 Plan was updated following the first of the Environment Agency's 10 year reviews. Based on our evidence we have:</p> <ul style="list-style-type: none"> • brought forward the deadline for adapting flood defences upstream (west) of the Thames Barrier by 15 years to 2050 (previously 2065) • confirmed that all options for replacing the Thames Barrier (end-of-century options) should remain open until a decision is made • brought forward the deadline for deciding on an end-of-century option from 2050 to 2040 <p>We are therefore pleased to see that the Sustainability Appraisal recognises the importance climate change related flood risk and includes supporting the TE2100 Plan in Objective 7 Climate change mitigation and resilience.</p>	Support noted.
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Water resources: In relation to references to water resources in Appendix 1, additional documents are recommended to be added:</p> <ul style="list-style-type: none"> • Thames Water, 2020. Water Resources Management Plan 2019 • Thames Water, 2023. Water Resources Management Plan, 2024 (draft) • EA, 2020. Meeting our future water needs 	<p>Appendix 1 (Other Plans and Programmes) now includes references to these additional documents.</p> <p>Reference to water resources has been made in relation to the Water Framework Directive and the Thames River Basin Management Plan (RBMP).</p>

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			<ul style="list-style-type: none"> • Water Resources South East (WRSE), 2023. Futureproofing our water supplies –Draft plan for South East England • CIRIA, 2015. The SuDS Manual (C753) • Thames Water, 2022. Catchment Strategic Plan – Beckton. <p>In addition, the Water Framework Directive and the Thames River Basin Management Plan (RBMP) should be considered for their implications for water resources. Currently, Appendix 1 only interprets these documents as being relevant for improving water quality.</p>	
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Water Cycle study: We were unable to identify whether the City has conducted a water cycle study. We would therefore support the SA in assessing the City Plan for its intention to conduct such a study. A water cycle study can help to identify where water management/quality issues may be occurring in the Square Mile, and in turn what solutions may be appropriate. It can be used to determine what SuDS interventions would be most effective in the City, as well providing a strong evidence base for decisions on water efficiency requirements in new and existing developments. For more information on water cycle studies, please visit this site: Water cycle studies - GOV.UK (www.gov.uk).</p>	Comments noted. The City Corporation has not conducted a Water Cycle Study.
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Biodiversity Net Gain (BNG): Please include, with reference to the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from an as yet unconfirmed date in November 2023.</p>	BNG is now referred to in Appendix 1 (Other Plans and Programmes).
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Flora and Fauna Legislation: Specific habitats and species receive legal protection in England under various pieces of legislation, including:</p> <ul style="list-style-type: none"> • The Conservation of Habitats and Species Regulations 2010 (as amended)19; • The Wildlife and Countryside Act 1981 (as amended)20; • The Countryside and Rights of Way (CRoW) Act 200021; • The Natural Environment and Rural Communities Act 200622; • The Hedgerow Regulations 199723; and • Wild Mammals (Protection) Act 199624 <p>Reference should be made to these where appropriate.</p>	References to these additional documents have now been added to Appendix 1 (Other Plans and Programmes).

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22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Lighting Design</p> <p>With reference to Paragraph 185 of the NPPF (2021) which states that planning policies and decisions should "limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation." We would urge appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust.</p>	Noted.
22/09/23	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Water resources:</p> <p>We are pleased to see that issues including climate change adaptation, flood risk and habitats (including both urban and the tidal Thames habitats) and that the importance on including them in the evolution of the local plan has been recognised.</p>	Support noted.
	Imogen Nayager-Stafford - Planning Specialist	Environment Agency	<p>Water resources:</p> <p>We note that Appendix 2 contains no baseline information on the water resources situation in the city, in London, in the Thames Valley, or indeed in South East England. We would strongly recommend that such information is included within Chapter 4. Soil and Water (page 30-33). Information such as the water supply/demand deficit, the high per head water use, and the measures proposed in alleviating the situation are all publicly available. Inclusion of this information would support the water efficiency scoping criteria suggested by this response.</p> <p>We welcome the SA's inclusion of the Water Framework Directive as a key piece of legislation against which the City Plan must deliver. We would, however, emphasise that the WFD does not simply set a target of achieving 'good' ecological status in WFD water bodies (Appendix 2, paragraph 4.4, page 32). It is in fact a legal obligation to prevent the deterioration of water bodies, including their biological quality elements and supporting elements. This legal obligation extends to supporting water body enhancements that might enable water body objectives to be met. Therefore, we would remind the SA that, under regulation 33 of the WFD, the City of London Corporation must have regard to the Thames River Basin Management Plan, and must consider the objectives of the Thames Middle catchment.</p> <p>We note in Appendix 2 that the commentary on water quality is simply that the City Plan should support the construction of the Thames Tideway Tunnel to reduce CSO discharges (an end of pipe solution). We would invite this commentary to go much</p>	<p>A new section has been created in Appendix 2 providing baseline information on water resources.</p> <p>The following amendment has been made: <i>The Water Framework Directive sets a target of aiming <u>provides a legal obligation to prevent the deterioration of water bodies, including their biological quality elements and supporting elements. In accordance with this legal obligation, the Directive sets specific goals for all water bodies</u> to achieve at least 'good status' in all water bodies by 2015.</i></p> <p>The following sentence had been added to the commentary: <u>A reduction in surface run-off in the City would form a proactive contribution to addressing the pressure of combined sewer overflow discharges on the Thames Middle waterbody.</u></p>

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			<p>further. As noted previously, the City has a role to play in managing the volume and quality of water that enters the combined sewer system, and therefore discharged into the river. In addition, we note that the Thames Middle catchment suffers from high levels of tributyltin compounds, and that the assessment has identified urban run-off as a probable driver for this failing status. The commentary from Appendix 2 should be expanded to state that a reduction in surface run-off in the City would form a proactive contribution to addressing the pressure of combined sewer overflow discharges on the Thames Middle water body.</p>	