

City of London

Sustainability Appraisal

Main Report

Local Plan Review

Environmental Report

City Plan 2040 Revised Proposed Submission

January 2024



Contents

1. Non-Technical Summary	4
2. Introduction	18
2.1. Scope of the SA	18
2.2. The City Plan 2040.....	19
2.3. Policy context.....	20
2.4. Structure of this report	21
2.5. How to comment on this report	24
3. Approach to SA	24
3.1. Stages in plan-making	24
3.2. Sustainability Appraisal.....	26
3.3. Stage A Scoping.....	26
3.4. Stage B Developing alternatives and assessing effects.....	33
3.5. Difficulties encountered.....	34
4. Sustainability context.....	34
4.1. Other relevant plans and programmes.....	34
4.2. Baseline and likely evolution without a plan	40
4.3. Sustainability issues and problems	41
Economy.....	42
Environment	42
Social Issues	43
5. Appraisal of effects / likely significant effects of the City Plan 2040.....	45
5.1. City Plan 2040 objectives	45
5.2. SA objectives versus City Plan 2040 objectives	46
5.3. Reasonable alternatives.....	47
5.4. Structure of City Plan 2040	54
5.5. SA findings – Revised Proposed Submission City Plan 2040 policies.....	63
Health Impact Assessment.....	70
Equality Impact Assessment	70
5.6. Assessment of significant changes made between the Proposed Submission and Revised Proposed Submission stages of the Local Plan	71
5.7. Cumulative effects of Revised Proposed Submission City Plan 2040 and other plans on SA objectives	94
6. Impact of the SA.....	101
7. Mitigation.....	101
8. Monitoring framework (proposed).....	102

9. Next steps	104
Appendices	106
Appendix 1 Other Plans and Programmes	106
Appendix 2 Baseline Information.....	106
Appendix 3 SA Consultation Responses.....	106
Appendix 4 SA of Reasonable Alternatives	106
Appendix 5 SA Assessments of the Revised Proposed Submission version of City Plan 2040)	106

1. Non-Technical Summary

Sustainability Appraisal Scope

The Sustainability Appraisal (SA) incorporates Strategic Environmental Assessment (SEA) and provides an appraisal of the City of London Corporation's Local Plan Review, referred to as the City Plan 2040. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in Planning Practice Guidance), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

The SA shows how well the City Plan performs against economic, social and environmental objectives. Prior to this stage, Integrated Impact Assessment (IIA) was undertaken of the City Plan, which incorporates SA, Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA). However, due to comments received on the previous consultation in 2021, the City Corporation decided that separate standalone EqIA and HIA would be undertaken. This Non-Technical Summary provides a summary of the SA findings.

1) The City Plan 2040 and its relationship with other plans and programmes

The City Plan 2040 will replace the adopted Local Plan 2015 as the primary policy document for planning in the City of London. It will guide development in the City through planning policies, contributing to the economic, social and environmental aspects of sustainable development. As the plan for spatial development in the City, it must take account of a wide range of other plans and programmes at international, national, regional and local level as set out in Section 4.1. These other plans and programmes include environmental targets, which the City Plan 2040 must contribute towards realising.

2) Current state of the environment and likely changes without a Plan

Economy – As a globally important business district, the City's predominant land use is offices. The area contributes to local, regional, national and international prosperity and relies on wider transport, utility and housing infrastructure to ensure its success. The City of London has been significantly impacted by the COVID-19 pandemic as a result of flexible and remote working, with major reductions in footfall. Prior to COVID-19, the City's workforce was predicted to grow by over 110,000 during the period of the Plan¹. Although the speed at which this growth takes place may be reduced in the short-term, recent economic modelling by the Greater London Authority (GLA) suggests a gradual return of economic activity and continued economic and employment growth in the City throughout the period to 2040. The overall office floorspace target of 1,200,000m² is derived from the estimated growth in office employment between 2021 and 2040, and represents a 13% increase in floorspace. Continued investor and developer interest in the City as a place in which

¹ The City Plan originally covered the period 2016 to 2036. The Plan period has since been amended to 2021 to 2040 to align with the City Corporation's Climate Action Strategy.

to do business indicates that it will continue to prosper and, over the life of the City Plan 2040, will see further employment growth.

The likely reduction in office occupation densities due to new ways of working following COVID-19 presents an opportunity for City offices and businesses to reinvent themselves and the way they work. Nowadays, many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be somewhat counteracted by a shift towards lower occupation densities within offices. The overall impact on floorspace demand may therefore be broadly neutral. Without a Plan the City would be unable to provide suitable office space to accommodate its growing workforce, taking account of new styles of working and accompanying infrastructure requirements.

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

Social – The City has a low resident population with around 8,600 people living in the City and a high proportion of second homes. Around 591,000 people work in the City – many of whom commute daily from a wide area to access workplaces, although working patterns are changing. The resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection, residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health and wellbeing of the City’s workers and residents could be compromised if insufficient recreation, relaxation and healthcare facilities were developed. Without changes to the adopted Local Plan, the City’s aspiration to develop its Destination City programme would also be less likely to progress. The flagship strategy seeks to ensure that the City is a global destination for workers, visitors and residents. It aims to enhance the Square Mile’s leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City’s working and resident communities

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

3) Environmental characteristics of areas likely to be affected

As a high-density urban environment, the City and surrounding areas suffer from poor air quality, urban heat island effect, noise and have a high potential for land and water pollution as a result of contaminated water run-off (Section 4.2). The process and procedures that are currently in place under the City’s Contaminated Land Inspection Strategy (2021-2030) should ensure that the City remains free from contaminated land. Wider initiatives on air and water quality such as the London Ultra Low Emission Zone and the Thames Tideway Tunnel will improve some aspects, but the City’s Local Plan is an essential element in implementation of these initiatives within the City. The City

should actively contribute to mitigating the causes of combined sewer discharges, and explore further measures to improve air quality.

4) Designated areas

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

- Epping Forest Special Area of Conservation
- Lee Valley Special Protection Area and Ramsar site

A separate Habitats Regulations Assessment has been carried out which concludes 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.”

5) Environmental protection objectives

The likely effects of the policy options and preferred policies considered throughout the plan-making process were appraised by reference to a framework of economic, social and environmental objectives and supporting criteria. These were informed by a review of other plans and programmes together with the identification of sustainability issues and problems facing the City, and were subject to consultation at Scoping stages.²

6) Significant effects of the City Plan 2040 policies

Assessment of the City Plan objectives against the City’s SA objectives (Section 5.2) showed general agreement between them and also assisted in strengthening the objectives at earlier stages of the plan-making process.

The assessment of the Revised Proposed Submission City Plan 2040 policies, both alone against the SA objectives (section 5.6) and in combination with other relevant plans (section 5.7), demonstrates that the sustainability impact of the Plan will be largely positive, as summarised below.

Table NTS1: Commentary on effects of Revised Proposed Submission City Plan 2040 against SA objectives

SA Objective	Total Effects	Cumulative Effects
1) Economic growth	The City Plan 2040 will largely sustain economic growth and employment opportunities, providing flexible office floorspace catered to people’s changing needs via the policies outlined in the ‘Offices’ section of the Plan together with suitable commercial floorspace, thereby supporting economic growth at a local, regional, national and international scale. One of the Economic objectives of the Plan is to deliver a minimum of 1.2 million sqm net	The cumulative impact of implementation of the City Plan 2040 alongside adopted plans for London’s economy such as the Mayor’s Economic Development Strategy and the London Plan will enable the City to maintain its position as a global leader in finance and business sectors with an internationally recognised agglomeration of offices. London Plan policies that seek to make the best use of land and grow a good economy will reinforce the City’s policies to sustain economic growth and

² Two separate Scoping stages were undertaken, one at the start of the project (2016) and another prior to the Revised Proposed Submission stage (2023).

SA Objective	Total Effects	Cumulative Effects
	<p>additional office floorspace by 2040. The Key Areas of Change will also help achieve this objective. The City Plan’s approach to visitors (including through the Destination City initiative) will also be beneficial in terms of supporting economic growth (e.g. through the night-time economy) – particularly following COVID-19, as growth is not solely reliant on people coming into the City for work. The City Corporation’s Destination City vision recognises the crucial role that culture and visitors will have to play in creating a more vibrant Square Mile that is a welcoming destination for everyone. Further to this, Strategic Policy S6: Culture and visitors seeks the development of a wide range of cultural, leisure and recreational facilities across the City. Some uncertainty is expected in relation to the transport policies and what effect servicing and consolidation works might have on economic growth. Increasingly, global and local businesses accept corporate social responsibility as an integral part of their business models, therefore providing an environment that caters for this is paramount.</p>	<p>employment opportunities locally, regionally, nationally and internationally – maintaining the City’s status as a leading international financial and business centre. The major uncertainty for the economy is the long-term impact of COVID-19 alongside the UK’s departure from the European Union.</p>
<p>2) Built environment and public realm</p>	<p>The SA shows that the proposed policies in the City Plan 2040 will have largely positive impacts at a local level in terms of providing an attractive, efficient, inclusive, accessible and digitally connected built environment and public realm. Strategic Policy S8: Design sets out a range of requirements covering issues ranging from sustainable design, form and layout, the experience of spaces, and the quality and character of buildings. Further to this, Policy DE1: Sustainable design sets out a ‘retrofit first’ approach, requiring all major development to identify the most sustainable and suitable approach for the site. The policy also sets high standards for environmental performance of new buildings, approaches that mitigate climate impacts, and design that is informed by circular economy approaches. Policy CV6: Evening and night-time economy supports public art in appropriate</p>	<p>The City Plan 2040 is aligned with the City’s Transport Strategy and public realm enhancement strategies which together take account of the London-wide transport, cycling and infrastructure strategies and plans for the Central Activities Zone (CAZ). The London Plan’s policies that seek to make the best use of land, create a healthy city and increase efficiency and improve resilience will contribute to achievement of an attractive, efficient, inclusive, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities in the City. This is also supported by the Mayor of London’s Expanding London’s Public Realm Design Guide and Public London Charter, which provide guidance for the design of internal, semi-internal and elevated public spaces in London, including how they will be accessible, inclusive, well maintained and serviced.</p>

SA Objective	Total Effects	Cumulative Effects
	<p>locations that consider the safety of pedestrians and road users, and those who may have mobility problems, whilst a number of the Key Area of Change policies outline the intended direction for the development of these areas, in addition to supporting improvements to the public realm and increased permeability. Policy DE2: Design quality requires an exemplar standard of design, including high quality detailing, finishes and materials, Policy DE3: Public realm supports the delivery of a high-quality and accessible public realm, whilst the Culture policies in Chapter 7 of the City Plan set out the ways in which the cultural offer of the City will be protected and enhanced. Given the urban nature of the City, the policies in the City Plan relating to the built environment will be particularly important in mitigating the potential negative effects of new development on this objective. For example, security measures have the potential to be negative for accessibility and public realm enhancement, and so must be sensitively designed. Improved vibrancy could change the character of some parts of the City but is generally supported by City workers.</p>	
<p>3) Safe environment and crime reduction</p>	<p>Some City Plan 2040 policies aimed at providing a livelier environment in the City could potentially increase anti-social behaviour, but increased vibrancy provides passive surveillance against low level crime. Passive surveillance is supported through a number of policies that require the incorporation of active frontages into development. Further to this, many of the policies require development proposals to encourage a mix of uses alongside natural surveillance of streets and spaces, design-out crime and develop area-based approaches to implementing security measures. Strategic Policy S2: Safe and secure City and Policy DE5: Terraces and elevated public spaces addresses this objective by treating safety and security as inherent parts of site design. The transport policies also seek to create a safer environment,</p>	<p>The City Plan 2040 will provide the spatial implementation of actions in the City of London Policing Plan and the safer City Partnership strategic plan. This is strengthened by the Mayor’s Police and Crime Plan and national anti-terrorism programmes. The London Plan seeks to promote strong and inclusive communities which further supports the City’s objective of reducing crime and antisocial behaviour, managing and responding to the security challenges that the City faces.</p>

SA Objective	Total Effects	Cumulative Effects
	<p>particularly for pedestrians and cyclists. Policy DE9: Lighting also contributes towards this objective by ensuring new developments are well-lit, including the public spaces around them so as to increase feelings of safety. The City Plan may, however, be limited in how it can address this objective as it cannot directly influence levels of crime. There are numerous references throughout the Plan to managing Hostile Vehicle Mitigation (HVM) where it is required, including in Policies SA3: Designing in security and DE5: Terraces and Viewing Galleries. Although HVM could have an adverse visual impact on the public realm and hinder pedestrian permeability, the Plan tries to prevent this through careful consideration of accessibility requirements. The policy on tall buildings applies the Civil Aviation Authority's maximum height limit for the safety of international flights.</p>	
4) Heritage assets	<p>Policies throughout the City Plan 2040 but particularly in Chapter 14: Historic environment strongly support the protection of heritage assets and their settings as a key part of the City's environment. According to Policy S11, the City's historic environment will be placed at the heart of placemaking, protected, celebrated and positively managed. Access to the historic environment will be enhanced so as to increase the number of opportunities available for workers, residents and visitors to enjoy the historic environment and learn from it. Retrofitting is supported so as to improve the environmental standards of historic buildings but together with infrastructure, could have negative impacts and so must be sensitively designed. Other policies that address high quality design more generally should also provide mitigation for the potential impacts of new development on heritage assets and their settings in and around the City.</p>	<p>National and London-wide heritage protection overseen by Historic England and the GLA provide the framework for the City Plan 2040's heritage protection policies and the London Plan's heritage, culture and View Management Framework ensure wider protection where necessary. More specifically, the London Plan together with London's World Heritage Sites SPD, set out policies and guidance to conserve and enhance London's World Heritage Sites and their settings, which includes the Tower of London. The cumulative impact of these plans will assist the City in conserving and enhancing the significance of heritage assets and their settings, enabling public appreciation and access wherever possible.</p>
5) Waste management	<p>Offices, retail and markets policies in the City Plan 2040 have the potential for negative impacts on waste as do policies</p>	<p>The City of London has an agreement with the London Borough of Bexley and the South-East London Joint Waste Planning</p>

SA Objective	Total Effects	Cumulative Effects
	<p>on hotels and the night-time economy. However, the process of redevelopment in the City where buildings are often demolished to make way for new ones creates the biggest potential impact on waste. The City Plan has adopted a 'retrofit first' approach whereby there is a requirement for maximum retention and retrofit of existing buildings while allowing redevelopment where it would be more sustainable or suitable. This will drastically reduce construction and deconstruction waste. The transformation and adaptation of space, circular economy principles and resource conservation as required by the City Plan will be essential during the Plan period .</p>	<p>Group (Brexley, Bromley, Greenwich, Lewisham and Southwark) to manage the City's waste apportionment. Waste Planning Authorities inside and outside London where the City's waste is deposited will need to continue accepting waste from the City. This will be helped by waste minimisation and circular economy principles which are promoted in the London Plan and the London Environment Strategy. Together these plans will help to decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings. Projects like the Thames Tideway Tunnel will also help in sewage management.</p>
<p>6) Environmental protection</p>	<p>Many of the policies in the City Plan 2040 have positive impacts on environmental protection, contributing to carbon emission reductions, air and water quality improvements and noise and light pollution abatement. However, some policies including retail, night-time economy, river transport and short-term residential lets were seen as having potential negative impacts. Approaches such as 'retrofit first' identified in Policy DE1: Sustainable design should help achieve better environmental protection through minimising embodied carbon, alongside the incorporation of sustainable design and construction measures to recognised standards. Encouraging more active and sustainable travel which a number of the policies do should also help reduce emissions, in addition to air pollution. Two of the Key Areas of Change, the Thames Policy Area and Blackfriars, support construction of the Thames Tideway Tunnel, which will help prevent raw sewerage from entering the Thames and the associated negative effect on water quality.</p>	<p>Environmental protection is strongly supported through the London Environment Strategy, the Mayor's Transport Strategy and the London Plan (particularly those in the 'Design and character' section), providing a wider drive to reduce pollution. The amended Building Regulations 2010 and the Future Building Standard from 2025 will also work alongside these policies to ensure that new build homes and other buildings, including offices and shops, generate 30% lower emissions than current standards. The Thames Tideway Tunnel will also help address existing water quality issues by preventing raw sewage from entering the Thames. Since pollution does not respect borough boundaries, this will in turn assist the City's objective to maximise protection and enhancement of the natural environment.</p>
<p>7) Climate mitigation and resilience</p>	<p>Office and retail policies within the City Plan 2040 were identified as having the potential for negative impacts on climate change mitigation, due to the heating and cooling requirements of offices and subsequent energy demands. However, reduced reliance on the private car as a result of Plan provisions</p>	<p>Climate mitigation and resilience are strongly supported at national level through the BEIS Clean Growth Strategy and at regional level by the Mayor's Environment Strategy and London Plan. London Plan carbon targets form the basis of the carbon reduction policies in the City Plan 2040, supporting the SA objective of</p>

SA Objective	Total Effects	Cumulative Effects
	<p>designed to improve the public realm and walking and cycling connectivity will contribute towards climate change mitigation. The City Plan requires buildings to achieve high environmental standards, which will help reduce emissions associated with buildings and their overall contribution to climate change. There is, however, potential for these high environmental standards to make development less viable. The City Plan includes a number of aspirational policies seeking to adapt to the effects of climate change, particularly in the 'Climate Resilience' section. Policies such as S15: Climate resilience and flood risk and CF1: Overheating and urban heat island effect set out wide ranging measures that will combine to help achieve this objective. The 'Design' section of the City Plan also contains policies that require development in the City to adhere to high standards of design and construction to help achieve a zero carbon City by 2040.</p>	<p>mitigating climate change, assisting in maintaining energy security and promoting climate change resilience. The Mayor of London has set a target for London to be net zero carbon by 2030. In order to achieve this, by 2030 there will need to be a 40% reduction on the total heat demand of buildings, 2.2 million heat pumps in operation in London, 460,000 buildings connected to district heating networks, a 27% reduction in distance travelled by cars, and a ban on fossil fuel car and van sales³. In terms of reducing emissions from transport sources, the policies outlined in the previous column in conjunction with expansion of the Ultra Low Emission Zone and a shift to electric vehicles, will help reduce emissions associated with private vehicles. All of these measures will combine to help achieve climate change mitigation and adaptation.</p>
8) Open spaces	<p>The impact of City Plan 2040 policies on the Open space objective was assessed as mainly positive, with protection for the City's public open spaces and a drive for greening the City through an urban greening target and a requirement to achieve 3 biodiversity units on-site per hectare. Many of the policies support open space provision and enhancements to the public realm. One of the Key Areas of Change, Blackfriars, will include a civic space, green terraces and a venue for outdoor events, sports, leisure and recreation. Flood risk and sustainable drainage policies also have the potential to make a positive contribution depending on their design. Various policies contained within the City Plan, particularly those in the 'Open Spaces and Green Infrastructure' section, specifically aim to conserve and enhance biodiversity, with positive effects on biodiversity and urban greening. The</p>	<p>The Mayor's Environment Strategy encourages biodiversity enhancement across London. Coupled with the London Plan, which implements urban greening, this assists in the City's objectives to enhance provision and enhancement of open spaces and improve opportunities for biodiversity. The Environment Act 2021 will also help contribute towards the achievement of this objective by making biodiversity net gain mandatory in most development from 2024. Taken together, these should limit the potential adverse impacts of development provided for by the Plan. The City's aspiration to enable public access to privately owned spaces is supported by the London Plan aim to build strong and inclusive communities.</p>
9) Biodiversity and urban greening		

³ Prime Minister Rishi Sunak confirmed in a speech on 20th September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035.

SA Objective	Total Effects	Cumulative Effects
	cumulative impact of these policies will be positive.	
10) Transport and movement	<p>The radical changes in the ‘Transport’ and ‘Health, Inclusion and Safety’ policies within the City Plan 2040 have the potential to create a positive impact against this objective but there remain uncertainties regarding the patterns of pedestrian movement and the impact of freight and servicing. Changes in retail patterns and the night-time economy could also affect the efficiency and sustainability of transport. However, redevelopment in some of the Key Areas of Change offer the opportunity to revisit and improve servicing arrangements. Many of the policies also support greater pedestrian permeability and prioritise walking and wheeling, while facilitating the servicing of the Square Mile in suitable ways, for example through consolidation. The policies also seek to ensure development reinforces the Healthy Streets Approach, with subsequent beneficial effects on Transport and movement.</p>	<p>Wider transport and spatial development plans for London will impact on the City’s small geographic area. Neighbouring borough’s plans for intensification are mitigated by plans to increase public transport capacity, promote active travel modes and improve air quality associated with vehicle emissions. Strategic transport policies for London and the City’s Transport Strategy provide the framework for the City’s SA objective of improving the safety, sustainability, efficiency and attractiveness of transport and minimising the negative environmental and health impacts of travel in, to, from and through the City. Transport for London has adopted the Healthy Streets Approach, which was the framework used when the Mayor’s Transport Strategy was being created. The Healthy Streets Approach will help deliver a healthier, more inclusive City where people choose to walk, cycle and use public transport.</p>
11) Housing	<p>The City’s role as a business district means that the City Plan 2040 policies do not focus on housing to the same extent as other authorities’ plans might. However, the City’s small size and proximity to other areas enables housing to be provided elsewhere (as well as within the City), with the City contributing towards this through S106 contributions for affordable housing. Policy S3: Housing in the City Plan makes provision for a minimum of 1,706 net additional dwellings between 2025/26 and 2039/40 and seeks to achieve a minimum of 35% affordable housing⁴. Housing will be built to high standards of design and construction. Policy HS4: Housing quality standards requires that new housing developments meet appropriate outdoor space standards and amenity space for individual units, something that has been recognised as</p>	<p>The City relies heavily on other areas of London and beyond to provide housing for its 591,000 workers. The City’s contribution in providing jobs outweighs the need to provide significantly more housing within the City. London Plan housing policies and effective transport policies are key to the functioning of the City. The housing requirement to 2029 for all London Boroughs including the City (1,460) is set by the London Plan. The City’s commitment to meeting its London Plan housing target up to 2029 and to meet the housing requirement identified by the standard method up to 2040 will contribute to the SA objective of delivering an environment that meets the needs and expectations of residents. The amended Building Regulations 2010 alongside other policies, particularly those in the ‘Housing’ section of the City Plan, will ensure</p>

⁴ Residential developments with the potential for 10 or more units must achieve a minimum of 35% affordable housing This percentage increases to 50% for developments on public sector land.

SA Objective	Total Effects	Cumulative Effects
	particularly important in the wake of the COVID-19 pandemic.	housing is built to high standards of design and construction.
12) Social and cultural facilities	<p>Assessment shows mainly positive impacts from the City Plan 2040 on social and cultural facilities with provision of shared services and facilities benefiting neighbouring areas as well as the City. The policies in the 'Culture and Visitors' section of the Plan score particularly strongly against this objective, as they seek to increase the City's cultural offer in line with the Destination City initiative, aiming to create a more vibrant Square Mile that is a welcoming destination for everyone. Strategic Policy S6: Culture and visitors seeks the development of a wide range of cultural, leisure and recreational facilities across the City, whilst Policy CV2: Provision of arts, culture and leisure facilities requires the provision of arts, culture or leisure facilities in major developments, commensurate with their size.</p>	<p>The City's aspiration to develop a world-class cultural destination centred around the Barbican Centre and Smithfield is recognised in the London Plan and the Mayor's CAZ SPG and supported by the Mayor's Culture and Night-time Economy SPG. This aspiration coupled with the protection of existing facilities will help to provide suitable social and cultural facilities for all the City's communities.</p>
13) Health	<p>The City Plan 2040 as a whole takes a positive, proactive approach to health, which is reflected in the assessment. It includes objectives and various policies that will combine to improve the health and wellbeing of residents, workers and visitors, both directly and indirectly. In particular, the policies in the 'Health, Inclusion, and Safety' section of the Plan require development to contribute to healthy and active lifestyles, for example by providing access to sustainable transport links, green and blue infrastructure and open space and play facilities. Policy HL10 requires certain development proposals to be subject to a Health Impact Assessment. The policies promote improved air quality, the creation and protection of quieter spaces in the City, and the protection of health facilities and promotion of new ones, in suitable locations. They also seek to tackle noise pollution, manage construction and provide public toilets in appropriate locations. Other City Plan policies will address health and wellbeing indirectly, in particular those that seek to increase levels of walking</p>	<p>The City of London Joint Health and Wellbeing Strategy's aim of creating a healthy urban environment aligns with the City Plan 2040 which places a greater emphasis on healthy streets, healthy lifestyles and healthy places. The London Health Inequalities Strategy reinforces this need for healthy places, all of which will help to achieve the SA objective of improving the health of the City's resident, worker and student populations.</p>

SA Objective	Total Effects	Cumulative Effects
	and cycling including through the Healthy Streets Approach – as well as increasing levels of physical activity, this will reduce car use and the associated pollutants that can be damaging to human health.	
14) Education	The assessment of the City Plan 2040 has not identified any negative impacts on education. A small number of the policies are expected to have positive effects against this objective, as they promote access to education, training and skills through the retention and development of educational facilities. One policy (TP1: The Temples) has particularly positive effects against this objective, as it further supports the Inner and Middle Temples as centres for education, training, and facilities for barristers and students. The Plan also supports provision of student accommodation for central London Universities.	The City’s policy of joint provision of educational facilities relies on neighbouring boroughs' Local Plans for allocation of suitable sites and in turn supports the development of facilities such as academies in neighbouring boroughs.

The assessment identified that many of the Revised Proposed Submission City Plan 2040 policies would have significant positive or minor positive impacts when assessed against the SA objectives. The Key Areas of Change policies were significantly positive for economic growth and the built environment and public realm. Some negative effects were identified but none were significant negative. The negative effects relate to the commercial nature of development in the City and its impact on waste and the economic implications of restrictions on tall buildings to protect views of historic landmarks.

The detailed SA findings are presented in Appendix 5: SA Assessments of the Revised Proposed Submission version of the City Plan 2040. A summary of the assessment findings is provided below.

Table NTS2: Assessment of the strategic policies in the Revised Proposed Submission City Plan 2040 against the SA objectives

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education
Spatial Strategy															
	Spatial Strategy	↑↑↑	↑	↓	↓	↓	↓	↑	↑	↑	↑	↑	↑	↑↓	↑
Health, Inclusion, and Safety															
S1	Healthy and inclusive City	↑	↑	-	-	-	↑	↑	↑	↑	↑	↑	↑	↑↑	↑

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education
S2	Safe and secure City	↑↑↑	↑↓	↑↑↑	-	-	-	-	↑↓	-	↑↓	↑	-	↑	-
Housing															
S3	Housing	↑↓	↑	-	-	-	-	-	-	-	↑↑	↑	-	-	-
Offices															
S4	Offices	↑↑↑	↑↓	-	↑↓	↑↓	↑↓	↑↓	-	-	↑↓	-	-	↑	↑↑
Retail															
S5	Retail and active frontages	↑	↑	↑↓	↑↓	↑↓	↑↓	↑↓	-	-	↑↓	↑↓	↑	↑	-
Culture and Visitors															
S6	Culture and visitors	↑↑	↑	↑	↑	↑↓	↑↓	↑↓	↑	↑↓	↑↓	↑↓	↑	↑	↑
Infrastructure and Utilities															
S7	Infrastructure and utilities	↑↑	↑	-	↑↓	↑	↑	↑	-	-	↑	-	-	-	-
Design															
S8	Design	↑	↑	↑	↑	↑	↑	↑↑	↑	↑	↑	-	-	↑	-
Transport															
S9	Transport and servicing	↑↑ ↓↓	↑	↑	-	↑↓	↑	↑	-	-	↑↑	-	-	↑	-
S10	Active travel and healthy streets	↑↓	↑	↑	-	-	↑	↑	↑	-	↑↑ ↓	-	-	↑	-
Heritage and Tall Buildings															
S11	Historic environment	↑↑ ↓	↑↑↑	-	↑	-	-	↑	↑	-	-	-	↑	-	↑
S12	Tall buildings	↑↑↑ ↓	↑	↑	↑↑	-	↑	-	↑	-	↑	-	↑	↑	-
S13	Protected views	↓↓	↑	-	↑↑	-	-	-	-	-	-	-	-	-	-
Open Spaces and Green Infrastructure															
S14	Open spaces and green infrastructure	↑	↑	↑↓	↑↓	-	↑	↑	↑	↑	↑	-	↑	↑	-
Climate Resilience															
S15	Climate resilience and flood risk	↑	↑	↑	↑↓	-	↑	↑	↑↓	↑	-	↑	↑	↑	-
S16	Circular economy and waste	↑↑	↑	↑↑	-	↑↑	↑↑	↑↑	-	-	↑↑	-	-	-	-
Key Areas of Change															
S17	Thames Policy Area	↑↑	↑↑	↑	↑	↑↑	↑↑	↑	↑	↑↑	↑↓	-	↑	-	-
S18	Blackfriars	↑	↑	↑	↑	↑↑ ↓	↑↑	↑↓	↑	↑	↑	-	↑	↑	-
S19	Pool of London	↑	↑	↓	↑↑	↑↑ ↓	↑↓	↑↓	↑	↑	↑	↑↓	↑	↑	-
S20	Aldgate, Tower and Portsoken	↑	↑	↓	↑↑	↓	↑↓	↑↓	↑	↑	↑↓	↑	↑	↑	↑
S21	City Cluster	↑↑↑	↑↓	↑	↑↓	↑↓	↑↓	↑↓	↑↓	-	↑↓	-	↑↓	↑	↑

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education
S22	Fleet Street and Ludgate	↑	↑	↑↑	↑↑	-	-	-	↑	↑	↑↑↓	↑↓	-	-	↑
S23	Smithfield and Barbican	↑↑	↑	↑↓	↑↑	↑↓	↑	↑	↑	↑	↑	↑↓	↑↑↑	-	-
S24	Smithfield	↑↑	↑	-	↑	↑↓	-	-	-	-	↑	↑↓	↑↑↑	↑↑	↑↑
S25	Liverpool Street	↑	↑	↑↓	↑↓	↓	-	-	↑	↑	↑↑	-	-	↑	-
Planning Contributions															
S26	Planning contributions	↑↑↑	↑	↑	-	-	-	↑	-	-	↑↑	↑↑	↑	-	↑↑

Key to Table NTS2:

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

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

7) Mitigation measures

A small number of negative effects and a larger number of uncertainties were identified. Therefore, during the assessment process certain mitigation measures were identified that could be used to deal with these uncertainties. The assessment tables in Appendix 6 set out in detail the mitigation

measures identified for each set of policies and if/how these were taken into account throughout the plan-making process.

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

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

In developing the City Plan 2040, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2040 and take account of:

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

Some additional options emerged as the City Plan 2040 evolved, either through new evidence, regional requirements or consultation responses. One of the main difficulties encountered through the process was the COVID-19 pandemic. The UK was significantly affected, both in terms of people's health and wellbeing, and economically. The effects of the pandemic in the medium to long-term, and particularly over the full extent of the City Plan 2040 period, are still unknown.

Another difficulty encountered was and still is the uncertainty created by ongoing changes to the strategic planning context, including changes to national planning policy and guidance. In October 2023, the Levelling-Up and Regeneration Bill received royal assent. It outlines a number of reforms to the planning system, including the replacement of SA/SEA with 'Environmental Outcomes Reports', although many of the details are yet to be confirmed.

The objectives of the City Plan 2040 could be achieved through different policy options in some cases. Reasonable alternatives were evaluated for protection of offices; balance of land uses between commercial, housing and other uses; infrastructure and security; river related uses and river transport; hotels and business accommodation; historic environment; tall buildings and views protection; energy and CO₂ emissions; air quality; transport; waste; flood risk; open spaces; retail; housing numbers, location and tenure; social and community infrastructure; and design.

The outcomes of this assessment of alternatives (reported in Appendix 4) were used to inform the preferred options to take forward into policy for the City Plan 2040. Reasons for choosing the preferred options and rejecting other options have been included in this report (Section 5.5).

9) Monitoring

A draft monitoring framework has been developed to monitor the significant effects of implementing the City Plan 2040. This will ensure that where uncertainties exist any unintended

adverse effects are picked up quickly. The monitoring framework will be finalised on adoption of the City Plan 2040.

2. Introduction

2.1. Scope of the SA

- 2.1.1. This Sustainability Appraisal Report for the emerging City Plan 2040 incorporates Strategic Environmental Assessment (SEA). The SA incorporating SEA was formerly referred to as Integrated Impact Assessment (IIA), which incorporates SA/SEA in addition to Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA). However, due to comments received on the previous consultation in 2021, the City Corporation decided that separate EqIA and HIA should be undertaken. Hence, the plan assessment is now referred to as SA/SEA. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in Planning Practice Guidance), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.
- 2.1.2. The assessment procedure is an iterative process which evaluates the economic, social and environmental impacts of implementation of the proposed City Plan 2040. This report accompanies the Revised Proposed Submission version of the City Plan 2040 that is being published for Regulation 19 consultation and is the version that will be submitted for Examination.
- 2.1.3. The SA report provides details of the assessment process to date, including the Scoping stage – setting the context and objectives, establishing the baseline and deciding on the scope; and the assessment stage – developing and refining alternatives and assessing effects as the City Plan has developed.
- 2.1.4. The findings of the SA and how they have influenced the Revised Proposed Submission version of the City Plan 2040 are set out along with next steps, which will ensure that any changes recommended at Examination are assessed and mitigation and monitoring is put in place.
- 2.1.5. The SA, formerly IIA, was undertaken by the City of London Corporation with LUC undertaking an independent audit up until Regulation 19 Proposed Submission stage, to ensure that both the City Plan and IIA complied with the relevant legal and statutory requirements, while also taking into account good practice guidance. Following the COVID-19 pandemic, changes to the Use Classes Order and an advisory visit from a Planning Inspector, final changes were made to the Proposed Submission version of the City Plan and LUC was commissioned to directly update the Corporation's SA as a result of these changes.
- 2.1.6. Following this, the City Corporation took the decision to undertake a second Regulation 19 stage, referred to as the *Revised Proposed Submission* stage (to which this report relates). This was as a result of a significant number of developments following the previous consultation in 2021, which needed to be considered as part of the Local Plan Review. This included changes to the National Planning Policy Framework and planning legislation, the adoption of a new London Plan in 2021, the City Corporation's strong focus on the Destination City initiative to maintain its status as a global destination, and a commitment to achieve net zero emissions by 2040. The SA was updated by LUC to reflect these changes.

2.2. The City Plan 2040

2.2.1. The new Local Plan, called City Plan 2040, will set out the City Corporation's vision, strategy and objectives for planning for the next 15 years, together with policies that will guide future decisions on planning applications. Once adopted, the new City Plan will replace the current Local Plan which was adopted in January 2015.

2.2.2. The objectives of the City Plan 2040 promote economic, social and environmental benefits for the City's geographic area and its wider area of influence:

- **Economic objective** – To deliver 1.2 million sqm net additional office floorspace, ensuring new and refurbished offices meet the environmental, social and governance priorities of occupiers and their workforces, flexible and adaptable workspaces to cater for new ways of working, a more vibrant and diverse retail economy, enhancing the City's evening and weekend economy including through new and enhanced culture, leisure and visitor attractions, supporting infrastructure and generally enhancing life of the Square Mile as a whole.
- **Social objective** – To deliver new, inclusive open spaces, enhance the City's public realm for everyone, which includes the riverside, enhancing and transforming the seven Key Areas of Change, engagement with stakeholders, additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City, enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile.
- **Environmental objective** – To ensure that the City transitions to a net zero carbon City by adopting a 'retrofit first' approach to development, delivering urban greening and greater biodiversity, protecting and enhancing the City's historic environment and iconic skyline, ensuring exemplary design of development and promoting greater use of the River Thames for transport and enjoyment, and creating an attractive and accessible public realm that encourages uptake of more active travel modes.

2.2.3. In order to achieve these objectives, the City Plan 2040 sets out policies covering the City's primary land uses: offices, retail, housing, culture, visitor and community facilities, night-time economy, transport, open spaces and public realm. The City's policy approach to design, historic environment, tall buildings and protected views and the environmental challenges of climate change, urban greening, greater biodiversity, air quality and waste are specified, with the aim of maintaining a healthy and inclusive City that is safe and secure.

2.2.4. Despite its limited geographic area, covering just over one square mile, some parts of the City will experience more change than others during the lifetime of the Plan. The City's aspirations for these Key Areas of Change are described along with the City's interaction and influence on neighbouring boroughs.

2.2.5. The Review of the adopted Local Plan began in 2015. An Issues and Options consultation was carried out in September 2016 (Regulation 18). Consultation responses, emerging evidence, the IIA, London Plan and government guidance shaped the evolution of the Draft Local Plan which underwent consultation in November 2018 (also Regulation 18). Following this, changes were incorporated into the Proposed Submission version of the Local Plan, taking account of consultation responses, legislative changes, new evidence and the findings of the IIA. The

Proposed Submission version of the City Plan 2036⁵ underwent an additional round of changes following the COVID-19 pandemic, changes to the Use Classes Order, and an advisory visit from a Planning Inspector. It was consulted upon in March 2021 (Regulation 19). Then, the City Corporation took the decision to undertake a second Regulation 19 stage, referred to as the *Revised Proposed Submission* stage and to which this report relates. Submission of the City Plan 2040 is expected in April 2024, followed by examination in Autumn 2024 and adoption in 2025.

2.3. Policy context

- 2.3.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on a Draft Local Plan (Regulation 18), producing a Proposed Submission Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Levelling Up, Housing and Communities (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).
- 2.3.2. The National Planning Policy Framework (September 2023) sets out the requirement for local plans to “...be prepared with the objective of contributing to the achievement of sustainable development...”. This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).
- 2.3.3. The National Planning Policy Framework (NPPF) sets out the role of strategic policies in Local Plans to “...set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) community facilities (such as health, education and cultural infrastructure); and
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”
- 2.3.4. To assist in the development of sustainable Local Plans the NPPF requires that “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”
- 2.3.5. The Mayor’s London Plan (March 2021) is the spatial development strategy for the whole of Greater London. Local Plans within London must be in general conformity with the London Plan. The London Plan recognises the key economic role that the

⁵ The City Plan originally covered the period 2016 to 2036. The Plan period has since been amended to 2021 to 2040.

City plays in London’s prosperity, its position at the heart of the Central Activity Zone (CAZ) and its responsibility to protect and enhance key historic landmarks.

2.3.6. In November 2023, the Levelling-up and Regeneration Bill received royal assent. The Act sets out various planning reforms including the replacement of SA/SEA with ‘Environmental Outcomes Reports’; replacement of the CIL process and much of the section 106 payments system with a new National Infrastructure Levy; a shared framework of National Development Management Policies, removing much of this detail from Local Plans; replacement of Supplementary Planning Documents (SPD) with Supplementary Plans that carry more weight but would be subject to examination; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the local plan-making process; a speeded up plan-making process (plans to be prepared and adopted within 30 months); a strengthened role for the ‘National Model Design Code’; replacement of Neighbourhood Plans with Neighbourhood Priorities Statements; removal of the current NPPF requirement to demonstrate a rolling five-year supply of housing land, provided that the local plan is up-to-date; and removal of the ‘soundness test’ for local plans to be ‘justified’. Much of the detail of these reforms is yet to be confirmed.

2.4. Structure of this report

2.4.1. Sections 1 and 2 of this report provide a Non-Technical Summary and an introduction to the SA process and the City Plan 2040. Section 3 outlines the methodology used in the SA, section 4 sets out the sustainability context and highlights the sustainability issues and problems that the City faces, section 5 describes the likely impacts of implementation of the City Plan 2040 and section 6 shows how the SA has shaped the Plan. The remainder of the report identifies possible mitigation measures and discusses monitoring of the Plan’s impacts. A series of appendices provide full details of each stage.

2.4.2. Table 1 shows the requirements of the SEA Regulations and where each element is covered in this report.

Table 1: Meeting the requirements of the SEA Regulations

SEA Regulations requirements	Where covered in the SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sections 2.2, 2.3, 4.1 and Appendix 1 Other Plans and Programmes
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 4.2 and Appendix 2 Baseline information
c) The environmental characteristics of areas likely to be significantly affected.	Sections 4.2, 4.3 and Appendix 2 Baseline information

SEA Regulations requirements	Where covered in the SA report
	Section 4.3
	Sections 2.3, 4.1, and Appendix 1 Other Plans and Programmes
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).</p>	<p>Effects of the plan: Section 5 and Appendix 5 SA Assessments of the Revised Proposed Submission version of the City Plan 2040</p> <p>Effects of reasonable alternatives: Section 5.3 and Appendix 4: SA of reasonable alternatives</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	Section 7
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	Sections 3, 5.3 and 5.5
<p>i) A description of measures envisaged concerning monitoring in accordance with Reg. 17.</p>	Section 8
<p>j) A non-technical summary of the information provided under the above headings.</p>	Section 1
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).</p>	Addressed throughout the SA report
Consultation requirements	
<p>■ Authorities with environmental responsibility, when deciding on the scope and level of detail</p>	<p>■ Scoping consultation with statutory consultees carried out 11/1/2016-</p>

SEA Regulations requirements	Where covered in the SA report
<p>of the information which must be included in the environmental report (Reg. 12(5)).</p>	<p>29/2/2016; comments on the SA and responses set out in Appendix 3</p> <ul style="list-style-type: none"> ■ Scoping consultation with statutory consultees carried out 21/08/2023-22/09/2023; comments on the SA and responses set out in Appendix 3
<ul style="list-style-type: none"> ■ Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13). 	<ul style="list-style-type: none"> ■ Issues and Options consultation carried out 19/9/2016-31/10/2016; comments on the SA and responses set out in Appendix 3 ■ Draft City Plan consultation carried out November 2018; no comments were received on the SA ■ Proposed Submission City Plan consultation carried out March 2021; no comments were received on the SA
<ul style="list-style-type: none"> ■ Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14). 	<p>The Local Plan is not expected to have significant effects on other EU Member States.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</p>	
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ■ the measures decided concerning monitoring. 	<p>To be confirmed in the Adoption Statement after the Local Plan is adopted. However, draft information is included in the SA at Revised Proposed Submission stage as follows:</p> <p>Reasons for choosing the Plan in the light of the reasonable alternatives – Sections 5.3-5.5</p> <p>How the environmental report was taken into account – Section 6</p> <p>Monitoring framework – Section 8</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>	<p>To be addressed after the Local Plan is adopted.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>The SA report has been produced in line with current guidance and good practice for SA/SEA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

2.5. How to comment on this report

2.5.1. This SA report has been issued for consultation alongside the Revised Proposed Submission version of the City Plan 2040 (Regulation 19) in April 2024. For more information visit our website: www.cityoflondon.gov.uk/cityplan2040 or email localplan@cityoflondon.gov.uk.

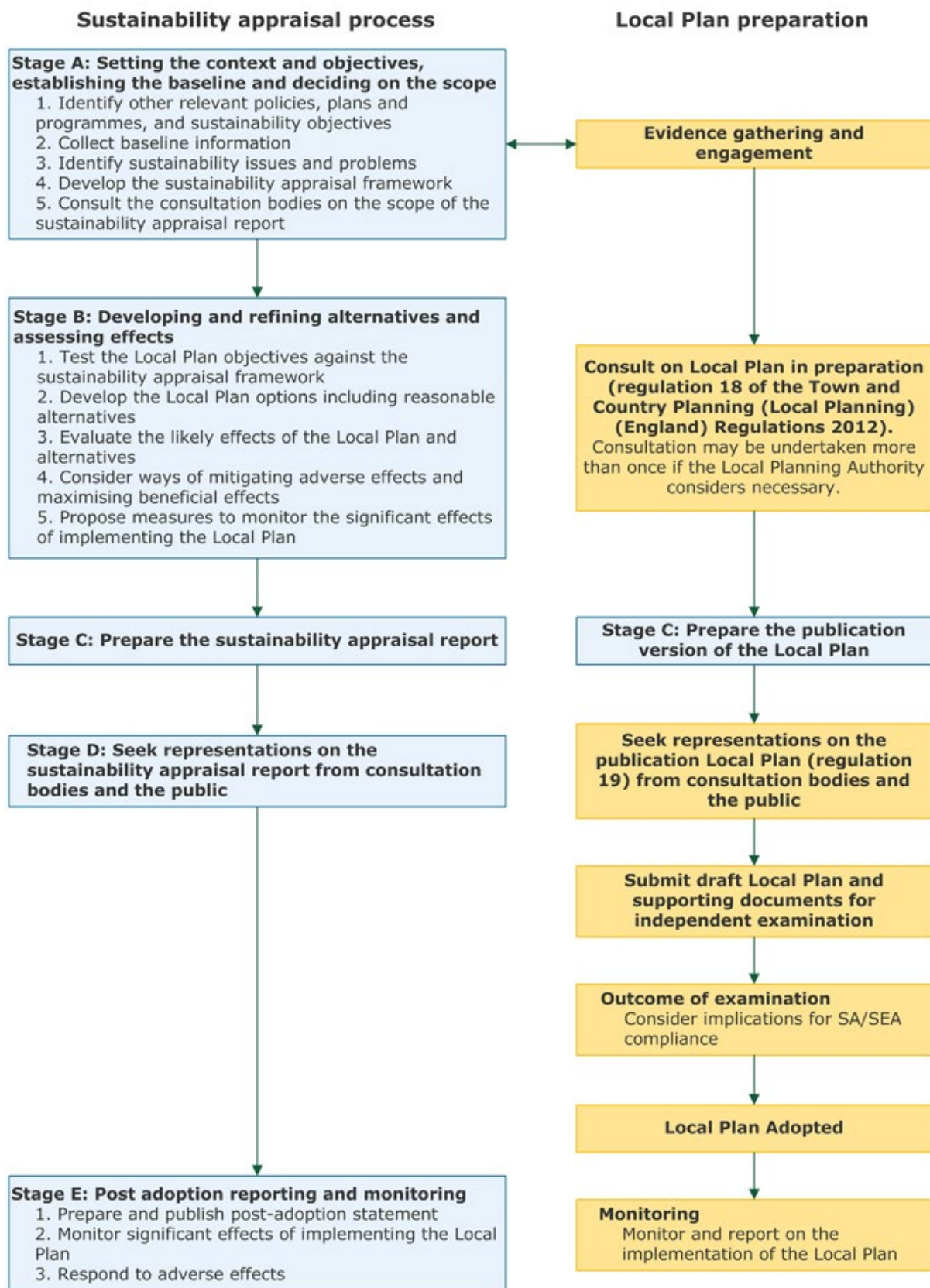
3. Approach to SA

3.1. Stages in plan-making

3.1.1. The Sustainability Appraisal is an iterative process which influences the development of a plan, aiming to make a plan more sustainable and more responsive to its environmental effects, by identifying the plan's significant impacts and ways of minimising its negative effects.

3.1.2. Figure 1 shows the relationship between the stages in plan making and the Sustainability Appraisal process.

Figure 1: Relationship between plan making and Sustainability Appraisal



3.2. Sustainability Appraisal

3.2.1. The Sustainability Appraisal of the City Plan 2040 has been carried out through an iterative process whereby alternative options, the drafts and Revised Proposed Submission version of the Plan have been assessed against a series of SA objectives. These objectives cover economic, social and environmental outcomes for the City and are accompanied by criteria which assist in evaluating whether implementation of the Plan would result in detrimental impacts. The objectives were derived through a collaborative process involving specialists from a range of disciplines within the City Corporation and were informed by the review of Other Plans and Programmes (Appendix 1) and consultation with statutory consultees.

3.3. Stage A Scoping

- 3.3.1. SA Scoping stage was originally carried out in 2016 and then again in 2023, as a result of evidence base updates and the period of time that had passed since the SA, formerly IIA, was consulted upon. A series of other plans and programmes relevant to the development of the City Plan 2040 were identified. This is a live list and has been updated as new strategies and policies have been implemented at international, national, regional and local level. Appendix 1 provides the most up to date version of the other plans and programmes list.
- 3.3.2. The sustainability objectives of these other plans and programmes, along with an analysis of the sustainability issues and problems facing the City, provided the basis for the development of a series of SA objectives and criteria for the assessment of policies. The SA objectives and criteria were subject to professional scrutiny by City Corporation experts to ensure they reflected an appropriate balance between economic, environmental and social aspirations for the City. Table 2 shows the final objectives for economic, environmental and social development of the City.
- 3.3.3. Up to this Revised Proposed Submission stage, Integrated Impact Assessment was undertaken of the City Plan, which in addition to SA/SEA, also incorporates Equality Impact Assessment and Health Impact Assessment. Due to comments received on the previous consultation in 2021, the City Corporation decided that separate standalone EqIA and HIA would be undertaken instead of incorporating these into the IIA. Subsequently, the final IIA (now SA) objective 'Quality and inclusion' which covers equalities issues was removed from the assessment framework.
- 3.3.4. Baseline information for this SA built on the monitoring evidence from the adopted Local Plan and other evidence studies to provide a snapshot of the current conditions, highlighting any apparent trends.
- 3.3.5. Statutory consultees were invited to comment on the scope of the SA (February 2016 and August 2023) leading to some alterations to the objectives and criteria. A summary of their responses and how the City Corporation has taken them into account can be found in Appendix 3.

Table 2: SA Objectives for the City of London

<p>1) Economic growth</p> <p>To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City’s status as a leading international financial and business centre.</p>	<p>Global financial centre, financial and business services, tech and IT, supporting businesses – hotels, retail.</p> <p>Will the policy provide the business environment to attract and retain global financial, business services and Technology, Media and Telecommunications companies?</p> <p>Will the policy provide employment in supporting businesses and services providing a range of job opportunities?</p> <p>Will the policy enable the City to grow and compete with other global financial and business centres?</p> <p>Will the policy help to sustain and increase the City’s contribution to the London and UK economies?</p> <p>Will the policy facilitate state-of-the-art digital connectivity and sustainable utility infrastructure to support the business City?</p> <p>Will the policy aid the City’s recovery following the COVID-19 pandemic?</p>
<p>2) Built environment and public realm</p> <p>To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities.</p>	<p>Built environment, public realm, digital connectivity, well designed, smart cities, supporting infrastructure.</p> <p>Will the policy provide an attractive and inclusive public realm?</p> <p>Will the policy encourage improvements to the public realm?</p> <p>Will the policy secure high-quality design that enhances the built environment and character of the City?</p> <p>Will the policy enable the efficient use of land?</p> <p>Will the policy enable accessibility for everyone?</p> <p>Will the policy enable high speed digital connectivity, particularly following the COVID-19 pandemic and increase in hybrid working?</p> <p>Will the policy facilitate integrated urban solutions to problems such as congestion, waste, resource use and demographic changes?</p> <p>Will the policy enable effective enforcement of planning conditions to reduce adverse impacts of development?</p> <p>Will the policy sustain and enhance the positive contribution made by built heritage to the City’s environment?</p>
<p>3) Safe environment and crime reduction</p> <p>To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.</p>	<p>Crime reduction, antisocial behaviour, fear of crime, security, anti-terrorism</p> <p>Will the policy reduce crime and fear of crime?</p> <p>Will the policy tackle anti-social behaviour through design, use and management of buildings and spaces?</p>

	<p>Will the policy provide effective security features within buildings including high profile sites?</p> <p>Will the policy provide effective security in the public realm beyond individual buildings?</p>
<p>4) Heritage Assets</p> <p>To conserve or enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.</p>	<p>Historic environment, conservation areas, listed buildings, scheduled monuments, historic parks and gardens, world heritage sites, archaeological remains</p> <p>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>Will the policy preserve archaeological remains and other historic assets in situ and allow access for viewing?</p> <p>Will the policy encourage investigation, recording, publication and archiving of historic buildings, archaeological monuments and remains?</p> <p>Will the policy protect the historic and townscape character, including views of historically important landmarks and buildings?</p> <p>Will the policy improve understanding and appreciation of heritage assets including those that are concealed from view?</p> <p>Will the policy successfully balance access, climate adaptation and mitigation; and digital connectivity requirements with the need to conserve and enhance heritage assets?</p>
<p>5) Waste management</p> <p>To decouple waste generation from economic growth enabling a circular economy⁶ in the City that minimises waste arisings.</p>	<p>Decoupling waste generation from economic growth – maximise efficiency, water efficiency, circular economy.</p> <p>Will the policy reduce waste, including construction and deconstruction waste, food and household waste?</p> <p>Will the policy reduce the overall waste arising per capita?</p> <p>Will the policy reduce hazardous waste arisings from the City?</p> <p>Will the policy enable waste to be managed further up the waste hierarchy?</p> <p>Will the policy make efficient use of resources including water?</p> <p>Will the policy facilitate disposal or treatment of waste within or close to the City?</p> <p>Will the policy facilitate sustainable waste transport?</p>

⁶ A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

	<p>Will the policy promote circular economy principles?</p> <p>Will the policy encourage the transport of materials by rail or river where possible?</p> <p>Will the policy safeguard existing wharves, particularly Walbrook Wharf?</p> <p>Will the policy maximise use of materials at their highest utility and value?</p>
<p>6) Environmental protection</p> <p>To maximise protection and enhancement of the natural environment.</p>	<p>Air quality, water quality and resources, land contamination, light and noise.</p> <p>Will the policy improve air quality?</p> <p>Will the policy improve water quality and prevent contamination?</p> <p>Will the policy improve water quality by reducing diffuse urban pollution?</p> <p>Will the policy make efficiency use of water resources and reduce demand on these resources?</p> <p>Will the policy encourage use of existing resources?</p> <p>Will the policy mitigate and adapt to climate change impacts?</p> <p>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?</p> <p>Will the policy prevent land contamination and facilitate clean-up of existing contaminated land?</p> <p>Will the policy result in minimisation of noise and light pollution and nuisance?</p> <p>Will the policy provide suitable levels of daylight and sunlight for the City's buildings and open spaces?</p>
<p>7) Climate change mitigation and resilience</p> <p>To mitigate climate change, assist in maintaining energy security and promote climate change resilience.</p>	<p>Climate change mitigation, carbon emission reduction, energy security, climate change resilience, urban heat island.</p> <p>Will the policy improve sustainability, energy efficiency and/or reduce carbon emissions associated with buildings or transport?</p> <p>Will the policy enable the use of low and zero carbon technologies including renewables and decentralised energy networks, and the 'Square Mile' net carbon neutral by 2040?</p> <p>Will the policy improve energy security for City premises?</p> <p>Will the policy make the City's buildings and spaces more resilient to climate impacts (flooding, storm damage, drought, overheating)?</p> <p>Will the policy improve the microclimate and ameliorate the heat island effect so as to make the City more resilient to extreme weather?</p>

	<p>Will the policy assist in reducing vulnerability to flood risk within and beyond the City (e.g. by supporting TE2100 plan)?</p> <p>Will the policy champion sustainable growth and help to retain the City's role as a leading centre for green sustainable investment and growth?</p> <p>Will the policy advocate the importance of green spaces and urban greening as natural carbon sinks?</p> <p>Will the policy promote retrofit and refurbishment for existing buildings and minimise carbon emissions of existing buildings and materials?</p>
<p>8) Improved Open Spaces</p> <p>To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.</p>	<p>Open space provision, design for inclusivity and accessibility, multiple uses.</p> <p>Will the policy protect existing open spaces?</p> <p>Will the policy increase the amount of publicly accessible open space?</p> <p>Will the policy improve the quality and design of existing open space?</p> <p>Will the policy enhance tranquillity of open spaces?</p> <p>Will the policy encourage multiple uses for open spaces such as sport, recreation, relaxation, food growing, public and private events (subject to local byelaws)?</p> <p>Will the policy ensure that open spaces reflect and interpret the local distinctiveness of an area, particularly in historic places?</p> <p>Will the policy provide new or improve existing amenity space?</p> <p>Will the policy improve access for all to the City's public realm and open spaces?</p>
<p>9) Biodiversity and urban greening</p> <p>To improve opportunities for biodiversity and increase the provision of natural environments.</p>	<p>Biodiversity, habitats and species</p> <p>Will the policy increase protection and improve opportunities for biodiversity and result in net gain in biodiversity?</p> <p>Will the policy enhance the River Thames as a Site of Metropolitan Importance for Nature Conservation?</p> <p>Will the policy affect any other Sites of Importance for Nature Conservation?</p> <p>Will the policy protect existing trees and increase tree planting?</p> <p>Will the policy increase tree planting, green roofs, green walls and soft landscaping and lead to their positive management for biodiversity?</p> <p>Will the policy affect any Natura 2000 sites?</p>
<p>10) Transport and movement</p> <p>To improve the safety, sustainability, efficiency and attractiveness of</p>	<p>Efficient public transport, low emissions CO2, NOx, particulates, air quality exposure, road safety, promote active transport, delivery vehicles, reduce need to travel.</p>

<p>transport; minimising the negative environmental and health impacts of travel in, to, from and through the City.</p>	<p>Will the policy reduce the need to travel?</p> <p>Will the policy improve road safety for all, particularly vulnerable road users (pedestrians, cyclists and motor cyclists)?</p> <p>Will the policy encourage active transport (walking and cycling)?</p> <p>Will the policy improve the accessibility of the City's transport network?</p> <p>Will the policy encourage safe, convenient, accessible, economic and efficient public transport?</p> <p>Will the policy reduce the negative impacts of servicing and freight?</p> <p>Will the policy make better use of the river for transport?</p> <p>Will the policy reduce harmful emissions from transport?</p>
<p>11) Housing</p> <p>To deliver an environment that meets the needs and expectations of residents.</p>	<p>Housing, residential amenity</p> <p>Will the policy address housing challenges for City residents and workers? (availability and affordability)</p> <p>Will the policy contribute to meeting housing needs in London?</p> <p>Will the policy protect or improve residential amenity?</p> <p>Will the policy contribute to meeting the different needs of different groups such as older people and students?</p>
<p>12) Social and cultural facilities</p> <p>To provide suitable social and cultural facilities for all the City's communities</p>	<p>Vibrant social environment, leisure, cultural opportunities</p> <p>Will the policy help to provide a vibrant leisure, culture and retail destination that offer unique experiences at different times of the day and week?</p> <p>Will the policy protect and enhance social, community and cultural facilities which meet the expectations of City workers and residents?</p> <p>Will the policy encourage a vibrant social environment which attracts workers and visitors to the City whilst respecting the needs of residents?</p> <p>Will the policy decrease social isolation and improve the provision of opportunities for social interaction, leisure and sport?</p> <p>Will the policy enhance cultural opportunities attracting workers and global businesses to the City?</p> <p>Will the policy ensure the City's historic environment continues to contribute significantly to social and cultural life in the Square Mile?</p>
<p>13) Health</p> <p>To improve the health of the City's resident, worker and student populations.</p>	<p>Healthy lifestyles, health facilities, access to healthy food, mental health</p> <p>Will the policy enable and encourage healthy lifestyles – exercise, active travel, healthy food, social interaction etc.?</p>

	<p>Will the policy maintain or improve access to health facilities?</p> <p>Will the policy reduce exposure to poor air quality?</p> <p>Will the policy provide opportunities for stress reduction?</p> <p>Will the policy reduce problems associated with alcohol, smoking and drug use?</p> <p>Will the policy reduce intrusive noise levels?</p> <p>Will the policy improve health and wellbeing through the provision of cultural facilities and activities?</p> <p>Will the policy have negative health impacts beyond the City?</p>
<p>14) Education</p> <p>To enable excellence in education for all the City's communities.</p>	<p>Education facilities preschool to higher education and professional development</p> <p>Will the policy provide educational facilities for nursery pre-school and school age groups, to meet the needs of residents?</p> <p>Will the policy encourage crèche/ nursery facilities to accommodate workers' children?</p> <p>Will the policy encourage appropriate further and higher education opportunities to support local, London wide and national needs?</p> <p>Will the policy provide professional training opportunities for the City's workforce?</p> <p>Will the policy provide training and job opportunities for City residents and City Fringe residents?</p>

3.3.6. The SA evaluates policy options and draft policies against these objectives using the following key (Table 3). This demonstrates the expected scale of all impacts for each option or draft policy.

Table 3: SA Assessment Framework

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

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

3.3.7. Comments are included to highlight the significant effects of the policy options in terms of direct or indirect effects, whether effects are permanent or temporary, and timescales. In the comments column the following applies in respect of timescale.

Short term	1-3 years
Medium term	3-10 years
Long term	More than 10 years

3.4. Stage B Developing alternatives and assessing effects

3.4.1. In developing the City Plan 2040, a series of options (reasonable alternatives) were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2040 and take account of:

- Changes needed to be in general conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted in 2015
- Informal stakeholder engagement
- The City Corporation’s objectives and priorities

- 3.4.2. Some additional options emerged as the City Plan 2040 evolved either through new evidence, regional requirements or consultation responses.
- 3.4.3. The spatial strategy in the City Plan has been revised throughout the plan-making process. This is partly due to the fact the previous version used the framing of the City Corporations Corporate Plan 2018-2023, which is in the process of being replaced.
- 3.4.4. In the refreshed version, the approach has been simplified and revised, and updated to comply with the Planning and Compulsory Purchase Act 2004 which requires local planning authorities to identify the strategic priorities for the development and use of land in the authority's area. A series of strategic priorities have been set out, grouped together under the three sustainable development objectives set out in the NPPF. These strategic priorities have been informed by the objectives set out in the spatial strategy of the Proposed Submission version of the Plan, as well as other corporate strategies such as the Transport Strategy, and have been informed by evidence and stakeholder engagement.
- 3.4.5. The spatial strategy focuses on those aspects of the Plan that have a spatial dimension, and brings together in one place the spatial elements of the individual policies through which it is implemented.
- 3.4.6. Reasonable alternatives that were considered by the City Corporation during the plan-making process in selecting these spatial elements were appraised in relation to the individual policy themes, as set out in Appendix 4.
- 3.4.7. Each option was assessed using the SA framework. The outcomes of these assessments throughout the plan-making process are provided in Appendix 4. These assessments informed decisions on the preferred approach for the emerging policy.

3.5. Difficulties encountered

- 3.5.1. Uncertainty has been created by the COVID-19 pandemic, which has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people's health and wellbeing, and economically. The medium to long-term effects of the pandemic are uncertain. Another difficulty has been the uncertainty created by ongoing changes to the strategic planning context, including changes to national planning policy and guidance, and the London Plan. In October 2023, the Levelling-up and Regeneration Bill received royal assent. It outlines a number of reforms to the planning system, although many of the details have yet to be confirmed.

4. Sustainability context

4.1. Other relevant plans and programmes

- 4.1.1. The preparation of the City Plan 2040 has taken account of a range of other plans and programmes. A summary of these is included in Appendix 1 and listed below.
- 4.1.2. Following the UK's departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Relevant EU legislation has still been referred to in this report unless the corresponding UK legislation has been amended.

Other Local Plans and Programmes

- City of London Guidance Planning Advice Note (2023)
- City of London Statement of Community Involvement 2023
- City of London Policing Plan 2022-2025 (2022)
- City of London Statement of Licensing Policy 2022
- City of London Preventing Suicides in High Rise Buildings and Structures Planning Advice Note (2022)
- City of London Lighting Supplementary Planning Document (SPD) (2023)
- City and Hackney Joint Strategic Needs Assessment City Supplement (2021)
- City of London Riverside Strategy (2021)
- City of London Contaminated Land Inspection Strategy 2021-2030 (2021)
- City of London Local Flood Risk Management Strategy 2021-2027 (2021)
- City of London Public Health Intelligence Strategy and Action Plan (2021)
- City of London Planning Obligations SPD 2021
- City of London Visitor Destination Strategy 2019-23: COVID-19 Supplement (2020)
- City of London Climate Action Strategy 2020-2027 (2020)
- Thermal Comfort Guidelines (2020)
- City of London Housing Strategy 2019-2023 (2019)
- City of London Cultural and Creative Learning Strategy 2019-23 (2019)
- City of London Transport Strategy 2019
- City of London Air Quality Strategy 2019-2024 (2019)
- City of London Visitor Destination Strategy 2019-2023 (2019)
- Safer City Partnership Strategic Plan 2019-2022 (2019)
- The City Cluster Vision 2019
- City of London Sport and Physical Activity Strategy 2015-2020 (2019)
- City of London Road Danger Reduction and Active Travel Plan 2018-2023 (2018)
- City of London Cultural Strategy 2018-22 (2018)
- City of London Draft Local Implementation Plan 3 2019/20-2021/22 (2018)
- City of London Lighting Strategy (2018)
- Culture Mile Look and Feel Strategy (2018)
- City of London Education Strategy 2019-2023 (2018)
- City of London Skills Strategy 2019-23 (2018)
- City of London Corporate Plan 2018-23 (2018)
- City of London Delivery and Servicing Guidance (2018)
- Archaeology and Development Guidance SPD (2017)
- City of London Air Quality SPD (2017)
- City of London Noise Strategy 2016-2026 (2017)
- City of London Historic Environment Strategy (2017)
- City of London Joint Health and Wellbeing Strategy, 2017-2020 (2017)
- City of London Biodiversity Action Plan 2021-2026 (2016)
- City Public Realm SPD (2016)
- City of London Housing Asset Management Strategy 2015-2020 (2015)
- Cheapside and Guildhall Area Enhancement Strategy (2015)
- Riverside Walk Enhancement Strategy (2015)
- Barbican and Golden Lane Area Strategy (2015)
- City of London Local Plan (2015)
- City of London Open Spaces Strategy SPD 2021 (2015)

- City of London Thames Strategy SPD (2015)
- City of London Office Use SPD (2015)
- City of London Community Infrastructure Levy Charging Schedule (2014)
- City of London Waste Strategy 2013-2020 (2014)
- West Smithfield Area Enhancement Strategy (2013)
- Liverpool Street Area Enhancement Strategy (2013)
- Bank Area Enhancement Strategy (2013)
- City of London Tree Strategy 2012
- Fenchurch and Monument Area Enhancement Strategy (2013)
- City of London Tree Strategy (2012)
- City of London Protected Views SPD (2012)
- City of London Strategic Flood Risk Assessment 2017
- Aldgate and Tower Area Enhancement Strategy (2012)
- Chancery Lane Area Enhancement Strategy (2009)
- Fleet Street Courts and Lanes Design Strategy (2003)

Other Regional Plans and Programmes

- Water Resources Management Plan, 2024 (draft) (2023)
- Futureproofing our water supplies – Draft plan for South East England (2023)
- Catchment Strategic Plan – Beckton (2022)
- The Mayor’s Transport Strategy 2021/22 (2022)
- ‘Police and Crime Plan 2022-25 (2022)
- Southwark Core Strategy adopted 2011 and saved policies from the 2007 Southwark Plan, being reviewed (2022)
- Thames Estuary 2100 Plan (2022)
- Mayor’s Strategy for Equality, Diversity and Inclusion (2022)
- London Plan Guidance (2022)
- London Plan (2021)
- Health Inequalities Strategy Implementation Plan 2021-24 (2021)
- Westminster City Plan (2021)
- Lambeth Local Plan 2020-2035 (2021)
- Homes for Londoners: Affordable Homes Program 2021-2026 (2021)
- Meeting our future water needs: a national framework for water resources (2020)
- Expanding London’s Public Realm: Design Guide (2020)
- London Urban Forest Plan (2020)
- London Recovery Programme (2020)
- Tower Hamlets Local Plan (2020)
- Hackney Local Plan adopted (2020)
- Freight and Servicing Action Plan (2019)
- Water Resources Management Plan (2019)
- Bunhill and Clerkenwell Area Action Plan (London Borough of Islington) (2019)
- Safeguarded Wharves Review 2018-2019 (2019)
- Vision Zero Action Plan (2018)
- Walking Action Plan (2018)

- Cycling Action Plan (2018)
- London Environment Strategy (2018)
- The London Health Inequalities Strategy (2018)
- The Mayor's Cultural Strategy; Culture for all Londoners (2018)
- The Mayor's Economic Development Strategy for London (2018)
- Smarter London Together (2018)
- London Housing Strategy (2018)
- London Food Strategy (2018)
- Zero Carbon London: A 1.5°C Compatible Plan (2018)
- Mayor's Skills for Londoners Strategy (2018)
- Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy (2018)
- London Office Policy Review 2017
- Camden Local Plan (2017)
- Mayor's (Homes for Londoners) Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)
- Thames River Basin Management Plan 2015
- Mayor of London CAZ SPG (2016)
- Tower of London – World Heritage Site Management Plan (2016)
- Mayor's Housing SPG (2016)
- The SuDS Manual (C753) (2015)
- Digital Inclusion Strategy (2015)
- London Infrastructure Plan 2050 (Update Report) (2015)
- A Cultural Tourism Vision for London 2015-2017 (2015)
- Mayor's Social Infrastructure SPG (2015)
- Mayor of London Character and Context SPG (2014)
- Accessible London: Achieving an Inclusive environment 2014
- Mayor's Sustainable Design and Construction SPG (2014)
- Mayor of London River Action Plan (2013)
- London View Management Framework SPG (2012)
- London's World Heritage Sites – Guidance on settings SPG (2012)
- Green infrastructure and Open Environments: The All London Green Grid (2012)
- The Mayor's Water Strategy (2011)
- The Mayor's Municipal Waste Management Strategy (2011)
- Islington Core Strategy and Development Management policies (adopted 2011 and 2013, being reviewed)
- Clearing the air: The Mayor's Air Quality Strategy (2010)
- Tower of London – Local Setting Study 2010

Other National Plans and Programmes

- National Planning Practice Guidance (NPPG)
- Carbon Budget Delivery Plan (2023)
- Powering up Britain (2023)
- Levelling Up and Regeneration Act 2023
- Levelling Up the United Kingdom White Paper (2022)

- British Energy Security Strategy (2022)
- Historic England Advice Note 4 Tall Buildings (2022)
- The Cycling and Walking Investment Strategy Report to Parliament (2022)
- A Fairer Private Rented Sector White Paper (2022)
- National Planning Policy Framework (NPPF) (2023)
- The Energy Performance of Buildings Regulations (2021)
- Net Zero Strategy: Build Back Greener (2021)
- The Environment Act 2021
- The Industrial Decarbonisation Strategy (2021)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Heat and Buildings Strategy (2021)
- National Design Guide (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- Build Back Better: Our Plan for Growth (2021)
- UK Hydrogen Strategy (2021)
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Fire Safety Act 2021
- Using the Planning System to Promote Healthy Weight Environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Building Safety Programme (2020)
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2019)
- Public Health England, PHE Strategy 2020-25 (2019)
- Historic England Advice note 1: Conservation area appraisal, designation and management (2019)
- BEIS Clean Growth Strategy 2019The National Adaptation Program—e – 2018-2023 (2019)
- Clean Air Strategy 2019
- Resources and Waste Strategy for England (2018)
- The National Adaptation Programme 2018-2023 (2018)
- Environment Agency – Groundwater protection: principles and practice (2018)
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- The Conservation of Habitats and Species Regulations 2018
- Housing White Paper: Fixing our Broken Housing Market (2017)
- Industrial Strategy: Building a Britain fit for the Future (2017)
- Historic England Good Practice Advice note: The setting of heritage assets (GPA3) 2017
- Housing and Planning Act 2016
- Historic England Advice note 2: Making changes to heritage assets (2016)
- Infrastructure Act 2015
- Historic England Good Practice Advice note – the Historic Environment in Local Plans (GPA1) (2015)
- Historic England Good Practice Advice in Planning – Managing significance in Decision-Taking in the Historic Environment (GPA2) (2015)

- National Planning Policy for Waste 2014
- Growth and Infrastructure Act 2013
- Energy Act 2013
- The Carbon Plan – reducing greenhouse gas emissions (2013)
- Localism Act 2011
- Conservation of Habitats and Species Regulations 2010 (as amended)
- Fair Society, Healthy Lives, The Marmot Review 2010
- Flood and Water Management Act 2010
- Climate Change Act 2008
- Planning Act 2008
- Natural Environment and Rural Communities Act 2006
- Planning and Compulsory Purchase Act 2004
- Countryside and Rights of Way Act 2000
- Hedgerows Regulations 1997
- Wild Mammals (Protection Act) 1996
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Wildlife and Countryside Act (as Amended) 1981

Other International Plans and Programmes

- United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)
- EU Biodiversity Strategy for 2030
- EU Environment Action Programme to 2030
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
- The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232)
- United Nations Sustainable development Goals 2015
- UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997) and Paris Agreement (2015)
- 2030 Agenda for Sustainable Development
- European Transport Policy: White paper roadmap to a Single European Transport Area 2011
- UN Strategic Plan for Biodiversity 2011-2020, including Biodiversity Targets
- EU Sustainable Development Strategy Reviewed 2009
- United Nations Declaration on Sustainable Development (the 'Johannesburg Declaration')
- EU Water Framework Directive 2000/60/EC and amendments
- European Landscape Convention 2000
- International Convention on Biological Diversity 1992
- Valetta Treaty 1992
- Habitats Directive 92/43/EEC 1992
- UN Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') 1992

- European Convention for the Protection of the Architectural Heritage of Europe 1985
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), The Athens Charter (1931) and The Venice Charter on the Conservation and Restoration of Monuments and Sites (1964)

4.2. Baseline and likely evolution without a plan

4.2.1. Appendix 2 provides baseline information with an indication of progress against the sustainability objectives from the adopted Local Plan Sustainability Appraisal.

4.2.2. Economy – baseline – The City of London has retained its high ranking in the Global Financial Centres Index. Employment has risen steadily from 332,000 in 2009 to approximately 591,000 in 2021, while the City's output rose about 5% per year in the five years up to 2018, slightly above the figure of 4% for the UK. City jobs have grown over 8% since pre-pandemic 2019 to 2021, with nearly 45,000 more jobs than in 2019. However, the COVID-19 pandemic has impacted this trend. Financial and business services employment has fallen by 1.1% in London. However, between 2020 and 2021, the financial and industrial sector saw a 4.7% increase in workforce jobs, which indicates the bounce-back of London's economy post COVID-19. This sector has experienced a drop of 5% in its outputs in 2020, in comparison to its strong 6.6% growth in 2019. However, it is projected that financial and business services outputs will grow by 5.5% in 2021 and by an additional 6.1% in 2022. It was estimated that as of 31st March 2020 there was 9.3 million m² of gross office floorspace within the City (City of London Corporation, Office Floorspace in the City of London). Changes in working practices as a result of COVID-19 are likely to result in lower occupation densities in the City's office buildings with a corresponding need for supporting breakout space.

4.2.3. Economy – Likely evolution without a plan – Without a plan there is a danger that the type, quantity and quality of workspace needed to accommodate the rising working population would be inadequate. Although the City of London has been significantly impacted by the COVID-19 pandemic, economic modelling by the GLA suggests a gradual return of economic activity and projects significant employment growth in the period to 2040. London and the City could lose out to other centres either elsewhere in the UK or further afield affecting the UK economy. In appraising the effects of the City Plan 2040 against the likely future baseline in the absence of the Plan, no major changes to the current baseline have been assumed with regard to the UK's departure from the EU. As the effects emerge of the UK's departure from the EU, including future trade arrangements, they will be considered by the City Corporation and any necessary adjustments to planning policy made via review of the City Plan and accompanying further sustainability appraisal at that time. Key transport problems such as congestion of service vehicles and pedestrian overcrowding on the streets would get worse if development were not accompanied by appropriate transport and street scene alterations. Lack of coherent planning for utility infrastructure and connectivity would disadvantage City businesses compared with other global financial centres. The absence of a strategic approach to safety and security could result in greater vulnerability to natural and man-made threats

- 4.2.4.Environment – baseline – There was a net increase of open space from 31.35 hectares in 2013/14 to 34.55 hectares in 2021/22. New open space provision in the City of London has included the replacement of open space lost due to redevelopment works, and city public realm projects, providing open space on underused street space. This is complemented by 56,800m² total green roof area supporting biodiversity (Local Plan monitoring report green roofs, March 2021). The Thames Site of Metropolitan Importance for Nature Conservation suffers from frequent sewer overflows which affect its biodiversity value and water quality. The City, in common with much of London, is an Air Quality Management Area for NOx and particulates. The City remains free from contaminated land. There has been a significant reduction in the City’s carbon emissions in recent years.
- 4.2.5.Environment – Likely evolution without a plan – The pressure for development to accommodate additional workers could result in encroachment into the City’s valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Air quality and climate impacts of development would not be mitigated, leading to degradation of the local environment and an inability to meet air quality and carbon targets. However, there are opportunities for new developments to create open spaces at ground and elevated levels, and to create green roofs, green walls and roof terraces. Water quality in the Thames is likely to improve once the Thames Tideway Tunnel is completed in 2025. As Nationally Significant Infrastructure this will go ahead in the absence of the City Plan 2040, however associated public realm improvements will be implemented in line with the Local Plan. Without strategic planning for waste, and local waste reduction, the costs of waste management could escalate as other Waste Planning Authorities fail to plan for waste imports from central London. Heritage assets, archaeological remains and views of historic landmarks could have diminished protection without local protection through the City Plan 2040.
- 4.2.6.Social – baseline – The City has a resident population of around 8,600 with higher than average levels of educational attainment and better health than the UK population average. The working population is over 591,000 with a young age profile and 64/36 male/female gender balance. Social deprivation is relatively low within the City but the surrounding boroughs have higher levels of deprivation.
- 4.2.7.Social – Likely evolution without a plan – The City’s relatively small resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health of City residents is likely to remain above average since the City is a relatively affluent area with easy access to health facilities. Furthermore, positive policies in the existing NPPF, London Plan and the adopted Local Plan which enable healthy lifestyles should bring health benefits for residents and workers. However, Local Plan social infrastructure policies can help to protect health facilities, and provide facilities outside the City Without changes to the adopted Local Plan the City’s aspiration to develop the cultural hub around the Barbican Centre would be less likely to progress.

4.3. Sustainability issues and problems

- 4.3.1. The sustainability issues and problems which the City faces were identified in the SA, formerly IIA, Scoping Reports. The main sustainability issues and problems are summarised below:

Economy

- 4.3.2. **Employment** – The City’s working population is projected to grow by just under 100,000 during the Plan period, driven by economic growth, loss of offices elsewhere in London and changes in working patterns, the introduction of new business sectors, expansion of professional services roles and supporting jobs such as those in the retail and hospitality sectors. Specifically, estimates based on GLA and ONS data show that the number of office workers in the City should grow by a further 73,000 and that the number of non-office workers in the City should grow by a further 24,000, up to 2040. Changes in working patterns as a result of COVID-19 and political uncertainty may result in the need for more flexible workspace and appropriate supporting services.
- 4.3.3. **Transport and movement** – Additional public transport capacity is now available as a result of the Elizabeth Line opening and the upgrading of Bank Station, which is now complete. Despite the success the Elizabeth Line, overall activity on the TfL underground remains below pre-pandemic levels, although TfL has reported increasing passenger numbers across all public transport modes during the period 2006-2023. Changing working patterns that have arisen since the pandemic, such as working from home becoming a more common practice, have seen a reduction in daily commuting, and thus reducing congestion. The provision of facilities and infrastructure for active travel (walking and cycling) is important to combat climate impacts, particularly exposure to poor air quality, and for healthy lifestyles.
- 4.3.4. **Utilities infrastructure** – Infrastructure must keep pace with employment growth whilst enabling a reduction in carbon emissions, pollution, flood risk and water use.
- 4.3.5. **Digital connectivity** – transformational changes in the level of connectivity are expected during the period of the City Plan 2040, particularly following the shift to remote working as a result of the COVID-19 pandemic. This must keep pace with business expectations without detriment to carbon emissions, energy use or the historic environment, public realm and security.
- 4.3.6. **Security** – It is important that the City remains an open and welcoming place and that necessary security infrastructure is kept as unobtrusive as possible.

Environment

- 4.3.7. **Open space and biodiversity** – the City is densely developed, and open spaces form an important function for relaxation and recreation. They also provide pockets of space for wildlife, forming corridors for the movement of species, improving air quality and providing urban cooling benefits. Protection, enhancement and provision of new open spaces is imperative.
- 4.3.8. **Air quality** – The City of London, along with the rest of central London is an Air Quality Management Area for particulates (PM10) and oxides of nitrogen (NOx). Traffic, construction activity and combustion-based heating systems all contribute to the poor air quality.
- 4.3.9. **Soil and water quality, water resources and flood risk** – Baseline information identifies that prevention measures should keep the City free from contaminated land and the Thames Tideway Tunnel, when completed in 2025, will alleviate the symptoms of an over-pressured sewer system by reducing the frequency of CSO discharges. Different uses of Sustainable Drainage Systems should assist in providing protection from flood risk and water conservation measures will help protect water

resources, but some areas of the City may become more vulnerable to flooding, particularly sewer surcharge flooding as the climate changes.

- 4.3.10. **Climate change mitigation and adaptation** – The City is a high energy user, where low and zero carbon energy sources contribute a relatively small proportion to this energy consumption. Local measures will complement grid decarbonisation to reduce emissions. Resilience to the effects of climate change, which could include overheating, flood risk and more extreme weather events, must be incorporated into the design of buildings and public spaces if the City is to remain comfortable in future climate conditions.
- 4.3.11. **Waste** – The City will continue to rely on waste sites beyond the City’s boundaries for management and treatment of its waste arisings. Circular economy principles, waste minimisation and on-site waste management will become increasingly important in future.
- 4.3.12. **Heritage assets (architectural and archaeological)** – protection is in place for the City’s conservation areas, listed buildings and registered parks and gardens. The heritage assets within the City form part of a wider network of heritage assets that extend into neighbouring boroughs and beyond, all of which illustrate Greater London’s rich history. 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 bus 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 and the pre-eminence of St Paul’s Cathedral.
- 4.3.13. **Landscape and protected views** – Additional tall buildings will be needed to satisfy the need for additional employment space, however these buildings should be located so that they do not detract from the protected views of key landmark buildings, such as St Paul’s Cathedral, the Monument and the Tower of London, from viewing points within and beyond the City’s boundaries.

Social Issues

- 4.3.14. **Population** – The City’s population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important fraction. Provision of some services for the City’s usual residents and 1,714 second home owners entails partnership working with neighbouring boroughs, to ensure that cost effective health, education and social services can be provided. Suitable services will need to be provided taking account of a changing balance between residents, second home owners and the daytime needs of the increased working population.
- 4.3.15. **Equality** – The City is surrounded by less affluent areas some of which have high levels of deprivation. The City can be a catalyst for improvements in surrounding areas through the provision of local jobs and employment training and skills transfer to surrounding areas. Access and inclusivity will enable participation in the City’s prosperity regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity (parenthood), race, religion or belief, sex, sexual orientation.
- 4.3.16. **Housing** – The vast majority of the City’s workforce does not live in the City. The provision of suitable residential accommodation elsewhere in London and

beyond is essential for the City's competitiveness and economic growth. In particular the supply of affordable homes for workers on low and middle incomes is a key issue which must be addressed across London. The Local Plan can play a minor role in addressing this problem but co-operation with other local authorities will be essential. Future housing need in the City must take account of demographic growth, migration and the impact of welfare reforms, providing suitable housing some of which may be on City Corporation owned estates outside the City.

- 4.3.17. **Health and wellbeing** – The health of the City's workers and residents is generally better than average. Particular health issues in the City include stress and mental health problems, alcohol, drugs, smoking and air quality related health issues. The promotion and facilitation of healthy lifestyles for the City's workers, residents and visitors must sit alongside the provision of health facilities for these communities. The health facilities at St Bartholomew's hospital have recently undergone transformation as a cardiac and cancer centre of excellence and will continue to play a major regional role. The City provides opportunities for fitness, sport and recreation both in sports facilities and in informal settings such as the City's open spaces.
- 4.3.18. **Education and skills** – Educational achievement amongst City residents and workers is relatively high with City businesses demanding a highly skilled workforce. In order to retain this workforce, many of whom have global options, the City must remain an attractive working environment offering professional development opportunities and training. The student population of the City may change from its previous level (20,000) as educational institutions such as the London Metropolitan University consolidate their operations elsewhere and provincial universities seek satellite space in central London.
- 4.3.19. **Crime and antisocial behaviour** – Crime levels in the City are low making it one of the safest places in the country. The priorities for the City of London Policing Plan include counter terrorism, road safety, public order offences, antisocial behaviour, economic and cyber-crime and fraud. The design of buildings and the public realm can assist in reducing the potential for crime. Co-operation between the planning and licensing functions of the City Corporation can also assist in reducing the potential for anti-social behaviour associated with the growing night time economy in the City.
- 4.3.20. **Culture and leisure** – Alongside its status as a financial centre, the City Corporation's aspiration is for the City to strengthen its role as a destination for London and beyond (the 'Destination City'), as set out in Chapter 7: Culture and Visitors of the City Plan. The development of the City as a destination has planning implications, not least the need to ensure that the existing business environment, residential amenity, regional health facilities and open spaces are not compromised by the drive to intensify the City as a cultural destination. Visitor numbers are likely to increase from the current levels of 21.5 million trips per year, with consequential needs for facilities to serve their needs.

5. Appraisal of effects / likely significant effects of the City Plan 2040

5.1. City Plan 2040 objectives

5.1.1. The adopted Local Plan objectives and structure were used as the basis for identification of alternatives at the beginning of the plan-making process (Issues and Options stage). They were shaped by the City of London’s Corporate Strategy 2018-2023 which set the themes of Flourishing Society, Thriving Economy and Outstanding Environments. During the later stages of the plan-making process (Proposed Submission stage onwards), the Corporate Plan was under review and is now in the process of being replaced. The new Corporate Strategy is likely to set out a series of medium-term objectives for the Corporation as a whole, covering its work both within the City and outside of the City. Given the longer term timeframe for the City Plan 2040, and its focus on the Square Mile, a new set of objectives, grouped according to the NPPF pillars of sustainable development, have been developed, informed by the objectives/themes set out in the spatial strategy from the Proposed Submission version of the Plan, evidence, and stakeholder engagement. This is in line with the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to identify the strategic priorities for the development and use of land in the authority’s area.

5.1.2. The evolution of these objectives (table 4) retains the key elements of the previous Local Plan objectives with an increased emphasis on innovation, creativity, culture and resilience.

Table 4: Evolution of the City Plan 2040 objectives.

Objectives at Issues and Options Stage	Objectives at Revised Proposed Submission stage
To maintain the City’s position as the world’s leading international financial and business centre;	Economic objective – To deliver 1.2 million sqm net additional office floorspace, ensuring new and refurbished offices meet the environmental, social and governance priorities of occupiers and their workforces, flexible and adaptable workspaces to cater for new ways of working, a more vibrant and diverse retail economy, enhancing the City’s evening and weekend economy including through new and enhanced culture, leisure and visitor attractions, supporting infrastructure and generally enhancing life of the Square Mile as a whole. –
To ensure that the challenges facing the five Key City Places are met, complementing the core business function of the City, contributing to its unique character and distinguishing it from other global financial districts;	Social objective – To deliver new, inclusive open spaces, enhance the City’s public realm for everyone, which includes the riverside, enhancing and transforming the seven Key Areas of Change, engagement with stakeholders, additional homes and enhancing the City’s social infrastructure, creating new sports and recreation opportunities and
To ensure the provision of inclusive facilities and services that meet the high expectations of the City’s business, resident, student and visitor communities, aiming for continuous	

improvement in the City’s rating in satisfaction and quality of life surveys.	enhancing the City’s overall leisure and cultural offer.–
To promote a high quality of architecture and street scene appropriate to the City’s position at the historic core of London, complementing and integrating the City’s heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors.	Environmental objective – To ensure that the City transitions to a net zero carbon City by adopting a ‘retrofit first’ approach to development, delivering urban greening and greater biodiversity, protecting and enhancing the City’s historic environment and iconic skyline, ensuring exemplary design of development and promoting greater use of the River Thames for transport and enjoyment, and creating an attractive and accessible public realm that encourages uptake of more active travel modes.—
To ensure that the City of London remains at the forefront of action in response to climate change and other sustainability challenges that face high density urban environments, aiming to achieve national and international recognition for its sustainability objectives;	

5.2. SA objectives versus City Plan 2040 objectives

5.2.1. Comparison of the SA objectives with the City Plan 2040 objectives highlights where there is alignment between the aspirations for the City and objectives of the City Plan 2040 (Table 5).

Table 5: Comparison of City Plan 2040 Objectives with SA Objectives

Plan objectives →	Economic objective To deliver 1.2 million sqm net additional office floorspace, ensuring new and refurbished offices meet the environmental, social and governance priorities of occupiers and their workforces, flexible and adaptable workspaces to cater for new ways of working, a more vibrant and diverse retail economy, enhancing the City’s evening and weekend including through new and enhanced culture, leisure and visitor attractions, supporting infrastructure and generally enhancing life of the Square Mile as a whole.	Social objective To deliver new, inclusive open spaces, enhance the City’s public realm for everyone, which includes the riverside, enhancing and transforming the seven Key Areas of Change, engagement with stakeholders, additional homes and enhancing the City’s social infrastructure and creating new sports and recreation opportunities and enhancing the City’s overall leisure and cultural offer.	Environmental objective To ensure that the City transitions to a net zero carbon City by adopting a ‘retrofit first’ approach to development, delivering urban greening and greater biodiversity, protecting and enhancing the City’s historic environment and iconic skyline, ensuring exemplary design of development and promoting greater use of the River Thames for transport and enjoyment, and creating an attractive and accessible public realm that encourages uptake of more active travel modes.
SA objectives ↓			
Economic growth	√	√	√

Built environment and public realm	-	√	√
Safe environment and crime reduction	-	√	√
Heritage assets	-	-	√
Waste management	-	-	√
Environmental protection	-	-	√
Climate change mitigation and resilience	-	-	√
Open spaces	-	√	√
Biodiversity and urban greening	-	-	√
Transport and movement	-	√	√
Housing	-	√	√
Social and cultural facilities	√	√	√
Health	-	√	√
Education	-	√	-

Key

√	SA objectives align with City Plan 2040 objectives
-	No association between SA objectives and City Plan 2040 objectives

5.2.2. Assessment of the City Plan 2040 objectives against the City’s SA objectives showed general agreement between the SA aspirations and the objectives of the Plan. In particular, the environmental objective showed consistent alignment with the SA objectives.

5.3. Reasonable alternatives

5.3.1. In developing the City Plan 2040, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2040 and take account of:

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

5.3.2. Some additional options emerged as the City Plan 2040 evolved either through new evidence, regional requirements or consultation responses.

5.3.3. Assessment of these alternatives against the SA objectives is summarised in Appendix 4 'SA of Reasonable Alternatives'. Table 6 shows the alternatives considered with the preferred approach highlighted in green.

Table 6: Reasonable alternatives considered at Issues and Options stage with preferred approach highlighted in green

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft and Proposed Submission City Plan 2040
Office protection	Protect offices in commercial core only	Protect offices throughout the City	N/A	N/A	Thriving Economy Offices
Balance of land uses	Maintain City's B1 office employment focus	Diversify to allow more mixed-use serviced offices and affordable workspace	Diversify to allow more hotels	Diversify to allow more housing	Thriving Economy Offices
Utilities and digital infrastructure	Prioritise new utilities infrastructure according to strategic demand instigating a more collaborative approach to implementation and funding	Promote infrastructure improvements associated with each site in line with current planning policy	N/A	N/A	Thriving Economy Smart infrastructure and Utilities
Safety and Security	Continue to seek to strike a balance between promoting the night-time economy and protecting	Identify areas of the City to promote night-time uses	Identify areas of the City to restrict night-time uses		Flourishing Society Safe and Secure City

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft and Proposed Submission City Plan 2040
	residential amenity				
Key City Places	Retain existing Key City Places	Identify Key City Places to cover the whole City	Review and identify new Areas of change where change is expected during the Plan period	N/A	Key Areas of Change
River transport	Continue to seek greater use of the River Thames for transport	Actively promote /require the use of the Thames for future servicing of buildings	N/A	N/A	Outstanding Environment Vehicular Transport and Servicing
Development on or over the river	Continue to maintain the openness of the river by refusing development on or over the river	Allow selective development on or over the river subject to navigation and safety considerations	N/A	N/A	Key Areas of Change Thames Policy Area
Hotels and business accommodation	Continue to apply a criteria-based approach to new hotels	Identify areas where hotels should be restricted	Identify areas where hotels should be encouraged	Prioritise types of accommodation which specifically satisfy business needs (e.g. serviced apartments)	Thriving Economy Culture Visitors and night-time economy

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft and Proposed Submission City Plan 2040
Historic Environment	Protect only designated heritage assets and their settings	Protect designated and non-designated heritage assets and their settings	N/A	N/A	Outstanding Environment Historic Environment
Tall buildings and views protection	Promote tall buildings in the existing eastern cluster only	Protect additional views	Allow tall buildings in appropriate locations outside of strategic views and St Paul's Heights elsewhere in the City	Allow tall buildings in appropriate locations having regard to the settings of strategic heritage assets	Outstanding Environment Tall Buildings and Protected Views
Energy and CO2 emissions	Assist developers to achieve zero carbon by strategic planning for energy	Continue the current practice of site by site energy planning	N/A	N/A	Outstanding Environment Design
Air quality	Implement local solutions such as reassignment of vehicle space and stricter emission limits	Employ London-wide initiatives only	N/A	N/A	Flourishing Society Healthy and Inclusive City
Transport and public realm	Site by site approach to	Local Plan strategic approach to	N/A	N/A	Outstanding Environment Vehicular Transport

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft and Proposed Submission City Plan 2040
	transport and public realm	transport and public realm			and servicing Active Travel and Healthy Streets
Transport	Prioritise public transport	Prioritise pedestrian and cycle movement	Manage vehicle movement through restrictions and consolidation centres	N/A	Outstanding Environment Vehicular Transport and servicing Active Travel and Healthy Streets
Waste	Promote circular economy, zero waste plans and on-site waste management	Develop local facilities for waste management	Continue to rely on waste facilities elsewhere	N/A	Outstanding Environment Circular Economy and Waste
Flood risk	Require flood resilience measures in development schemes at risk of flooding	Rely on building owners to install flood resilience measures	N/A	N/A	Outstanding Environment Climate Resilience and Flood Risk
Open spaces	Protect all existing open space	Allow development on some open space	Require additional open space to be provided with development	N/A	Outstanding Environment Open Space and Green Infrastructure
Retail	Continue to focus A1 retail uses in existing Principal Shopping	Modify number or role of Principal Shopping	Consider retail development throughout the City	N/A	Thriving Economy Retail

Issue arising from Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Where it is addressed in the Draft and Proposed Submission City Plan 2040
	Centres and other retail in Retail Links	Centres (e.g. remove A1 priority in PSCs)	adopting a site by site assessment		
Housing numbers	Plan to meet London Plan target only (146 units per annum)	Plan to meet the level of need identified in the SHMA (125 units per annum)	Plan to significantly exceed the London Plan housing target	N/A	Flourishing Society Housing
Housing location	Restrict new housing to established residential clusters	Permit housing anywhere in the City if site is unsuitable for office use	N/A	N/A	Flourishing Society Housing
Affordable housing	Retain current affordable housing targets	Increase level of affordable housing required	N/A	N/A	Flourishing Society Housing
Social and community infrastructure	Meet need for social and community infrastructure in the City	Work with partners in neighbouring boroughs to meet social and community infrastructure needs	N/A	N/A	Flourishing Society Healthy and Inclusive City

Table 7: Reasonable alternatives considered at Draft Local Plan stage with preferred approach highlighted in green

Issue arising from the Local Plan 2015	Alternative 1	Alternative 2	Where it is addressed in the City Plan 2040
Employment floorspace targets	Retain existing pipeline of employment floorspace (1.4 million sqm)	Increase pipeline to meet the London Plan employment projections requirements (2 million sqm)	Thriving Economy Offices
Urban greening	Continue to encourage greening associated with development	Apply Urban Greening Factor target for major new development	Outstanding Environment Open Space and Green Infrastructure

Table 8: Reasonable alternatives considered at Revised Proposed Submission stage with preferred approach highlighted in green

Issue arising from the Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Where it is addressed in the City Plan 2040
Balance of land uses	Maintain City's B1 office employment focus (retain this focus)	Reconsider previous alternative 3 (hotels) due to increasing importance of making the City a leading leisure and culture destination; and providing fast-track options of converting office space into hotels, culture or education uses provided substantial majority of the existing building is retained.	N/A	Offices Retail Culture and Visitors
Employment floorspace targets	Plan to provide 1,200,000 sqm of office floorspace by 2040 to meet the City's office needs.	Retain existing pipeline of 575,000 sqm office floorspace.	N/A	Offices

Issue arising from the Local Plan 2015	Alternative 1	Alternative 2	Alternative 3	Where it is addressed in the City Plan 2040
	(The overall approach remains the same but there is a need for greater emphasis on building sustainably and retaining embodied carbon.)			
Housing numbers	Plan to meet the London Plan target of 146 units per annum until 2029 and then meet national policy requirements of 102 units per annum until 2040.	Plan to meet the level of need identified in the SHMA (103 units/annum).	N/A	Housing
Tall buildings	Accommodate development within the identified tall building areas.	Spread development evenly throughout the City.	N/A	Spatial Strategy Heritage and Tall Buildings
Retrofit and Retention of existing buildings	Require maximum retention of existing buildings and structures, with no demolition	Adopt a retrofit first approach for developments, prioritising retention of existing buildings while allowing redevelopment where it would be more sustainable or suitable	Allow demolition and redevelopment for all developments	Design (Sustainable Design)

5.4. Structure of City Plan 2040

5.4.1. The City Plan contains 27 strategic policies and 67 non-strategic policies, and is structured as follows:

- Spatial Strategy;
- Health, Inclusion and Safety;
- Housing;
- Offices;
- Retail;
- Culture and Visitors;
- Infrastructure;

- Design;
- Transport;
- Heritage and Tall Buildings;
- Open Spaces and Green Infrastructure;
- Climate Resilience;
- The Temples, the Thames Policy Area and the Key Areas of Change; and
- Implementation.

Reason for selecting preferred option in the Revised Proposed Submission City Plan 2040 policies

5.4.2. Table 9 summarises the reasons for choosing the preferred approach in light of the alternatives for each policy.

Table 9: Reasons for the preferred approach

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
Healthy and Inclusive City	The policies draw together a range of health and inclusivity aspects including City specific air quality requirements and partnership working to provide social and community facilities.	Emphasis on a healthy and inclusive City not only impacts the residents but also City workers and visitors. The City Corporation is committed to leading on air quality improvement for central London. As the City's residential population is small, sharing social and community services within neighbouring boroughs enables City residents to access sufficient services.	Air quality policies which just follow London wide initiatives would not address some specific City issues such as the high density of delivery vehicles and building related NOx and particulates. Local provision of services just within the City would mean the City Corporation could not provide the full range of health and well-being services, and residents would not be able to access them.
Safe and Secure City	Incorporate safety and security measures in development schemes and public realm, working with the City Police. Balanced approach to night-time economy and residential amenity.	A collective approach to safety and security issues provides the most effective outcomes. Collaboration with building owners on security relies on suitable designs, whilst developing area-based approaches to implement security measures are promoted. This encompasses the preferred approach of balancing licensing and	The small geographic area of the City makes segregation of night-time uses from residential areas impractical.

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
		planning requirements to reduce issues of conflict.	
Housing	Commit to meeting the London Plan housing target, providing housing in established residential clusters and seeking 35% affordable housing (50% on public land). Beyond 2028/29, the City will commit to deliver 102 units/annum to meet the housing requirement identified by the national standard method up to the end of the Plan period	The policies are in conformity with London Plan targets for the City on housing numbers and affordable housing. The siting of housing in residential clusters helps to protect residential amenity and assists in provision of services.	Allowing housing throughout the City could result in restrictions on business operation and construction activities due to disturbance. The amalgamation of sites for large offices would not be possible, if housing were provided outside the identified clusters.
Offices	Protect offices throughout the City, setting a target of 1.2 million sq m net additional office floorspace during the Plan period.	The preferred approach provides sufficient floorspace to accommodate GLA employment projections. Protection of office floorspace throughout the City will ensure that only surplus office space is released for other uses, although there is some flexibility regarding change to certain types of residential use within identified residential areas. A retrofit fast-track approach is adopted under Policy OF2: Protection of Existing Office Floorspace.	Protecting office floorspace only in the commercial core would have uncertain impacts and could result in insufficient office floorspace. The GLA has deleted references to defining a commercial core in the City in their Publication London Plan.

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
Retail and Active Frontages	<p>Promote the development of four Principal Shopping Centres directing major retail to PSCs. Allow smaller retail elsewhere, encouraging specialist retail uses and retail markets at suitable times and locations.</p>	<p>Promoting major retail in 4 rather than 5 PSCs makes these PSCs more attractive as retail destinations. While the role of PSCs as a focus for comparison and convenience shopping will be retained, changes to the Use Classes Order have diminished the ability of the Local Plan to prioritise these uses. Smaller retail uses elsewhere serve the time constrained workers requirement for catering outlets close to office locations. Specialist retail and retail markets add to the City's vitality.</p>	<p>The option of restricting retail to the PSCs and retail links only was rejected because changing retail trends indicate that mixed use development with retail in ground floor locations throughout the City is viable and desirable.</p>
Culture and Visitors	<p>Hotels are encouraged for business and leisure visitors, where they will not conflict with the business City. Criteria are set out to guide hotel development.</p> <p>Developing a wide range of cultural, leisure and recreation facilities across the City that offer unique experiences at different times of the day and week, in line with the Culture Planning Framework, and that support City's role as a visitor destination.</p>	<p>The policies allow for flexibility in the provision of visitor accommodation but set out impacts that would be unacceptable. This should result in suitable accommodation which does not conflict with other land uses.</p> <p>Destination City, the City Corporation's flagship strategy, seeks to ensure that the City remains a global destination for workers, visitors and residents. It aims at enhancing the Square Mile's leisure and cultural offer.</p> <p>The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. The international reputation and high quality of cultural activity has a</p>	<p>Specifying particular types of visitor accommodation or areas where hotels should be focussed was rejected since visitor accommodation needs fluctuate and such an approach could be too restrictive/undeliverable.</p>

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
		critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business.	
Infrastructure and Utilities	Minimise overall demands on the City's utility infrastructure, promoting engagement with utility providers and prioritising collective infrastructure and route sharing.	This more collaborative approach to utility infrastructure provides the basis for efficient provision of services which minimises resource use. This approach provides greater resilience to the City as a whole.	There is a danger that a site by site approach could lead to conflicts between the demands of existing and new development and potential for waste in the provision of physical infrastructure and its products (electricity, water, gas etc).
Design	<p>Sustainability standards are integrated into the design policy (Policy DE1: Sustainable Design) which carries forward the Local Plan design policy direction.</p> <p>Development proposals are to follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.</p> <p>Where new development is the most sustainable and suitable approach,</p>	Integration of sustainable design standards into Policy DE1 will ensure that these aspects are considered at an early stage and incorporated into the building design.	Although the Sustainable Design policy continues the site by site approach to energy planning and carbon offsetting this is set in the context of wider energy infrastructure (infrastructure and utilities).

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
	the policies seek new buildings to deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area.		
Transport and Servicing	Policy supports improvements to public transport capacity and proposes management of freight and servicing through consolidation and retiming.	This approach addresses the issue of freight and service vehicle congestion as the City's office floorspace intensifies. Continued support for public transport is essential to accommodate the anticipated increase in workforce during the Plan period.	The option of addressing vehicular transport through a site by site approach was rejected because it would not address vehicle congestion and air quality issues facing the City.
Active Travel and Healthy Streets	These policies place emphasis on delivering the Mayor's Healthy Streets approach, prioritising walking, wheeling and cycling and restricting non-essential traffic.	This approach addresses the issue of pedestrian and cycle congestion, improving air quality and promoting healthy lifestyles through active travel. Enhancement of the public realm is promoted taking account of everyone's needs.	The option of addressing transport and public realm on a site by site basis was rejected since it would not tackle the strategic issues of pedestrian and cycle congestion facing the City.
Historic Environment	The policy approach is to protect and where possible enhance designated and non-designated heritage assets	This approach reinforces the unique environment of the City where the settings of historic assets and listed buildings are protected and managed, and where they make a positive	The approach of only protecting designated heritage assets would be contrary to the London Plan.

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
	<p>and their settings, albeit differentiating between the tests that apply to designated and non-designated heritage assets in line with the NPPF. The approach also encourages development proposals to celebrate the City's heritage and better reveal and provide access to heritage assets, where feasible. The policies seek to preserve, protect, and enhance archaeological monuments, remains and their settings, including providing inclusive access to, public display and interpretation, where appropriate.</p>	<p>contribution to the primary business functions.</p>	
<p>Tall Buildings and Protected Views</p>	<p>The Revised Proposed Submission Plan will allow tall buildings within the identified tall building areas where they do not impact strategic views and other heritage constraints, including the prevailing townscape and</p>	<p>Tall buildings are promoted in the City Cluster and Fleet Valley areas as these are less sensitive and less constrained relative to other areas. Outside the identified tall building areas, tall buildings would be likely to have a considerable impact on heritage assets and on protected views from places within and outside the Square Mile, and could</p>	<p>The option of protecting additional views was rejected since it could impact on economic development. Formalising the view of St Paul's from Fleet Street was seen as reinforcing existing views protection for St Paul's Cathedral.</p>

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
	<p>character of the area and satisfy the requirements of other relevant policies, in addition to meeting environmental, design and other related policies. Policy formalises the view of St Paul's from Fleet Street, which had previously been applied on an informal basis in negotiations with developers.</p>	<p>significantly undermine the prevailing townscape and character of the area. These policies are in line with the London Plan and London Views Management Framework.</p>	
<p>Open Spaces and Green Infrastructure</p>	<p>Policy seeks to promote a greener City through protection and enhancement of existing open spaces and trees, measures to enhance biodiversity and creating and maintaining a high-quality green infrastructure. A target Urban Greening Factor for development has been introduced, in addition to biodiversity net gain/a target of 3 biodiversity units per hectare .</p>	<p>The preferred approach recognises the contribution that open space, trees and urban greening makes to health and wellbeing, climate resilience, biodiversity and air quality improvement.</p>	<p>The option of allowing development on some open space was rejected because of its detrimental impacts on the built environment and health and wellbeing. The option of requiring additional open space associated with development was rejected in favour of introducing a target Urban Greening Factor associated with development alongside net gains in biodiversity, although greater permeability in and around development sites is strongly promoted.</p>
<p>Climate Resilience</p>	<p>Overheating, urban heat island effects and flood risk are identified</p>	<p>The forward- looking approach to flood resistance and resilience, overheating and SuDS set</p>	<p>The option of relying on building owners to install flood resistance and resilience measures was</p>

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
and Flood Risk	as the main climate risks to be addressed. SuDS in all development and public realm, and flood resilience are required.	out in these policies should ensure that the City remains resilient in the face of climate change. This approach to SuDS will have benefits in reducing flood risk beyond the City.	rejected since such measures are more effective as part of the design rather than as retrofit.
Circular Economy and Waste	The preferred approach is to promote circular economy principles, promoting on site waste treatment for major sites. Continued reliance on waste sites outside the City is proposed.	The preferred approach provides a mechanism for reducing the waste generated in the City. This would reduce the environmental impacts of waste transport and treatment elsewhere.	The option of developing local facilities for waste management was rejected due to the small geographic area and high land values in the City which would make such facilities unviable.
These policies identify new areas where significant change is likely over the Plan period.	Eight Key Areas of Change have been identified: <ul style="list-style-type: none"> - The Temples and Thames Policy Area - Blackfriars - Pool of London - Aldgate, Tower and Portsoken - City Cluster - Fleet Street and Ludgate - Smithfield and Barbican - Liverpool Street 	These Key Areas of Change were identified through: <ul style="list-style-type: none"> Issues and Options consultation responses Internal consultation with City Corporation officers Discussion with Members of the Local Plans Sub-Committee Informal engagement with other stakeholders and partners Analysis of monitoring evidence and trend data. 	The option of keeping the Key City Places from the adopted Local Plan was rejected since change will affect different areas in the period to 2040. The option of identifying Key City Places to cover the whole of the City was rejected because it would fail to focus on areas where most development is likely to take place and where the provision of new infrastructure will be prioritised.
Planning contributions	Policy sets out the City's approach and priorities regarding planning contributions and	This policy sets out the framework for the use of S106 planning obligations and Community Infrastructure Levy to	The City's priorities for planning obligations have been carried

Policy topic	Proposed approach	Reason for choosing the proposed approach	Reason for rejecting alternatives
	framework for viability assessments.	mitigate the impact of development.	forward from the adopted Local Plan.

5.5. SA findings – Revised Proposed Submission City Plan 2040 policies

5.5.1. The assessment identified that many of the Revised Proposed Submission City Plan 2040 policies would have significant positive impacts when assessed against the SA objectives. The Key Areas of Change policies were significantly positive for economic growth and the built environment and public realm.

5.5.2. Some negative effects were identified but none were significant negative. The negative impacts relate to the commercial nature of development in the City and its impact on waste, in addition to potential economic implications of restrictions on tall buildings to protect views of historic landmarks. Mitigation for these and for the uncertain effects identified by the SA are discussed in Section 7.

5.5.3. The detailed SA findings are presented in Appendix 5 SA Assessments of the Revised Proposed Submission version of the City Plan 2040. A summary of the assessment findings is provided below. Table 10 sets out the SA scores for each of the City Plan 2040 strategic policies. This is followed by a narrative summary of the SA findings for both the strategic policies and the suite of more detailed policies that supports each of them, focussing on those effects that are expected to be significant. The key to the symbols used in Table 10 is as follows:

Key:

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

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

Table 10: SA findings for the strategic policies of the Revised Proposed Submission City Plan 2040

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education
Spatial Strategy															
	Spatial Strategy	↑↑↑	↑	↕	↕	↕	↕	↑	↑	↑	↑	↑	↑	↕	↑
Health, Inclusion, and Safety															
S1	Healthy and inclusive City	↑	↑	-	-	-	↑	↑	↑	↑	↑	↑	↑	↑↑	↑
S2	Safe and secure City	↑↑↑	↕	↑↑↑	-	-	-	-	↕	-	↕	↑	-	↑	-
Housing															
S3	Housing	↕	↑	-	-	-	-	-	-	-	↑↑	↑	-	-	-
Offices															
S4	Offices	↑↑↑	↕	-	↕	↕	↕	↕	-	-	↕	-	-	↑	↑↑
Retail															
S5	Retail and active frontages	↑	↑	↕	↕	↕	↕	-	-	↕	↕	↑	↑	-	-
Culture and Visitors															
S6	Culture and visitors	↑↑	↑	↑	↑	↕	↕	↕	↑	↕	↕	↕	↑	↑	↑
Infrastructure and Utilities															
S7	Infrastructure and utilities	↑↑	↑	-	↕	↑	↑	↑	-	-	↑	-	-	-	-
Design															
S8	Design	↑	↑	↑	↑	↑	↑	↑↑	↑	↑	↑	-	-	↑	-
Transport															
S9	Transport and servicing	↕	↑	↑	-	↕	↑	↑	-	-	↑↑	-	-	↑	-
S10	Active travel and healthy streets	↕	↑	↑	-	-	↑	↑	↑	-	↕	-	-	↑	-
Heritage and Tall Buildings															
S11	Historic environment	↕	↑↑↑	-	↑	-	-	↑	↑	-	-	-	↑	-	↑
S12	Tall buildings	↑↑↑	↑	↑	↑↑	-	↑	-	↑	-	↑	-	↑	↑	-
S13	Protected views	↕	↑	-	↑↑	-	-	-	-	-	-	-	-	-	-
Open Spaces and Green Infrastructure															

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	
S14	Open spaces and green infrastructure	↑	↑	↕	↕	-	↑	↑	↑	↑	↑	-	↑	↑	-	
Climate Resilience																
S15	Climate resilience and flood risk	↑	↑	↑	↕	-	↑	↑	↕	↑	-	↑	↑	↑	-	
S16	Circular economy and waste	↑↑	↑	↑↑	-	↑↑	↑↑	↑↑	-	-	↑↑	-	-	-	-	
Key Areas of Change																
S17	Thames Policy Area	↑↑	↑↑	↑	↑	↑↑	↑↑	↑	↑	↑↑	↕	-	↑	-	-	
S18	Blackfriars	↑	↑	↑	↑	↑↑	↑↑	↕	↑	↑	↑	-	↑	↑	-	
S19	Pool of London	↑	↑	↕	↑↑	↑↑	↕	↕	↑	↑	↑	↕	↑	↑	-	
S20	Aldgate, Tower and Portsoken	↑	↑	↕	↑↑	↓	↕	↕	↑	↑	↕	↑	↑	↑	↑	
S21	City Cluster	↑↑↑	↕	↑	↕	↕	↑↓	↑↓	↕	-	↑↓	-	↕	↑	↑	
S22	Fleet Street and Ludgate	↑	↑	↑↑	↑↑	-	-	-	↑	↑	↑↑↓	↕	-	-	↑	
S23	Smithfield and Barbican	↑↑	↑	↕	↑↑	↕	↑	↑	↑	↑	↑	↑↓	↑↑↑	-	-	
S24	Smithfield	↑↑	↑	-	↑	↕	-	-	-	-	↑	↕	↑↑↑	↑↑	↑↑	
S25	Liverpool Street	↑	↑	↕	↕	↓	-	-	↑	↑	↑↑	-	-	↑	-	
Planning Contributions																
S26	Planning contributions	↑↑↑	↑	↑	-	-	-	↑	-	-	↑↑	↑↑	↑	-	↑↑	

5.5.4.Spatial Strategy – The Spatial Strategy text serves to draw together in one place the spatial elements of the individual policies through which it is implemented. The text is expected to have a significant positive effect in relation to the economic growth objective, as it supports a considerable increase in office floorspace together with an improved retail and cultural offer, which will contribute to the City’s visitor economy whilst also providing employment. There is some uncertainty around what effect growth across the Square Mile will have on the historic environment, in addition to crime and safety, waste and environmental protection generally. The increased offer of the City would serve City residents but could also increase anti-social behaviour and result in waste generation, noise, light pollution and nuisance if not appropriately managed.

5.5.5.Healthy and Inclusive City – This group of policies incorporates inclusive buildings and spaces, environmental protection issues of air quality, noise and light pollution, contaminated land, social and community facilities including public toilets, sport, play and recreation, and requirements for Health Impact Assessment and Equality Impact Assessment. These policies perform well against the SA social and environmental

objectives with significant positive effects identified in relation to environmental protection, climate mitigation and resilience and health. There was some uncertainty as to whether provision of recreation facilities would conflict with biodiversity and greening. Against the economic objectives it was felt that this suite of policies could result in additional costs and conflict with the primary economic role of the City but were important in providing a high quality and attractive environment, resulting in mixed effects against the economic growth SA objective.

- 5.5.6. Safe and Secure City – This suite of policies were seen as essential for a high profile area like the City and promote collective security measures and counter terrorism, consulting with the City of London Police on risk mitigation measures, designing egress and dispersal routes and other security measures into development so that it is sympathetic to the surrounding area. These policies are therefore expected to result in significant positive effects in relation to the safe environment and crime reduction SA objective, as well as minor positive effects against a range of other IIA objectives, including the economic objectives. One of the main uncertainties was whether security measures could negatively impact on accessibility, and also negatively impact the provision of open spaces.
- 5.5.7. Housing – these policies address the quantity and location of new housing, loss of existing housing, residential quality and amenity and different types of short term lets, student housing, hostels, self-build and older persons housing. A significant positive effect was identified in relation to the housing SA objective as a result of affordable housing provision. More generally, these policies had mainly positive assessments against the social SA objectives although there was uncertainty as to the impact of older persons housing and short term lets on mainstream housing capacity. Policies had little impact on the environmental SA objectives but could be improved with more emphasis on open space and greening. Conflicts with the commercial role of the City were highlighted in the assessment against economic objectives but the City's small housing targets minimises this impact.
- 5.5.8. Offices – As the main land use in the City, policies in this section of the City Plan will determine the quantity and type of office development through protection of existing offices, targets for new office floorspace and the use of vacant commercial, business and service buildings or sites for “meanwhile uses”. Although the new Use Classes Order introduced in September 2020 enables existing offices to be converted to other Class E commercial, business and service uses without planning permission, conditions may be attached to permissions to prevent this. The office policies were seen to be significantly positive for economic growth with all other effects, including mixed positive and negative effects, being assessed as minor or uncertain. Mixed effects on the public realm were identified through increased pedestrian and vehicle numbers. Protection of offices was assessed as mixed minor positive and minor negative to housing capacity, reflecting changes to this policy at Regulation 19 stages which enable conversion of offices to certain types of residential use (e.g. Build to Rent and co-living) within identified residential areas. Lack of clarity on the types of “meanwhile uses” that might be allowed led to uncertainty against environmental and social objectives for this policy.
- 5.5.9. Retail and Active Frontages – The retail policies define the quantity and quality of retail development, Principal Shopping Centre designations, active frontages, retail at ground floor level, and specialist retail and markets. A significant positive effect was identified for the economic growth objective. The policies also had minor positive

effects on other economic and social objectives as they promote a mix of uses while also protecting residential amenity, with mixed effects on crime and anti-social behaviour due to the increased risk of minor crime and anti-social behaviour but increased surveillance in the more vibrant environment. Uncertain or minor negative impacts on environmental objectives such as waste and climate mitigation were identified, particularly associated with markets. Retailing was seen as mainly positive for the historic environment due to the emphasis on historic retail areas at Fleet Street and Leadenhall Market.

- 5.5.10. Culture and Visitors – This suite of policies seeks to promote a world class cultural environment, encouraging public art, protecting existing facilities and supporting open spaces for visitors, permitting hotels as long as they do not displace offices or harm amenity and limiting disturbance associated with the night-time economy. These policies were assessed as mainly positive for the economic and social SA objectives. This included significant positive effects in relation to the economic growth, built environment and public realm, heritage assets and social and cultural facilities SA objectives. There was less certainty over their impact on waste, environmental protection and climate change mitigation and resilience due to noise, pollution and energy use associated with visitor accommodation and the night-time economy.
- 5.5.11. Infrastructure and Utilities – These policies aim to ensure that sufficient utility infrastructure is available to support the level of development proposed in the City Plan 2040. Policies were assessed as having mainly positive effects with the only uncertainties being associated with heritage assets and climate mitigation and resilience objectives. None of the effects identified were judged to be significant, including for assessments where mixed effects were identified.
- 5.5.12. Design - These policies cover a wide range of design issues associated with new development and public realm. This includes sustainability standards, pedestrian permeability, terraces and viewing galleries, advertisements and shopfronts, lighting, daylight and sunlight. Positive impacts were identified against most SA objectives. Higher cost associated with some standards and restrictions due to daylight and sunlight requirements were seen as potential negatives for economic growth. Emphasis on appearance rather than function of the public realm was seen as an area where the policy could be improved. Significant positive effects were identified in relation to the waste management and climate mitigation and resilience objectives. The policy emphasises the importance of high environmental standards, and the adoption of circular economy principles.
- 5.5.13. Transport and Servicing – these policies deal with the impact of development on transport needs, freight and servicing, vehicle parking, river transport and aviation landing facilities. Servicing arrangements and the introduction of consolidation works for freight and waste has mixed or uncertain impacts against many of the SA objectives. Impacts will need to be monitored closely on implementation to ensure that negative consequences do not arise either within or outside the City. The assessment found a number of positive impacts on the built environment, movement, environmental protection and climate mitigation, particularly in relation to policies on vehicle parking, aviation and the impact of development on transport. Significant positive effects were identified for the climate mitigation and resilience and transport and movement objectives, due to the emphasis on improved public transport provision.

- 5.5.14. Active Travel and Healthy Streets – these policies promote the Healthy Streets approach providing for increased pedestrian and cyclist numbers and improved facilities in buildings to support active travel. The potential conflict between vehicle and pedestrian or cyclists’ needs on the City’s streets shows up through the assessment and the space needed for active travel facilities is seen as detrimental in relation to the economic growth objective by using space that could be let as commercial office space. However, the provision of facilities for active travel has many positive impacts on the built environment, environmental protection, climate change mitigation, health and equalities, particularly following the COVID-19 pandemic and social distancing measures. Significant positive effects were identified in relation to the transport and movement objective due to policies facilitating active transport.
- 5.5.15. Historic Environment – This policy protects the historic environment whilst managing change associated with heritage assets, ancient monuments and archaeology. Particular reference is made to the setting of the Tower of London. Significant positive effects are therefore identified in relation to the heritage assets SA objective. More generally, the impacts are assessed as mainly positive. Together with minor positive effects associated with economic growth, minor negative impacts are also identified since protection could restrict business development. However, the City’s historic landmarks are seen as a unique selling point for the City, with the positive impacts outweighing the negatives.
- 5.5.16. Tall Buildings and Protected Views – these policies protect the views of historic landmarks by restricting the areas that are appropriate for tall buildings. Positive effects were therefore identified in relation to the safe environment and crime reduction SA objectives, in addition to a significant positive effect against the heritage assets objective. More generally, the policies will have many positive impacts particularly at a regional scale but could restrict economic growth if sufficient office floorspace cannot be developed in the appropriate areas.
- 5.5.17. Open Spaces and Green Infrastructure – These policies promote a greener City, supporting urban greening in new development and requiring measures to enhance biodiversity. Assessment shows significant positive impacts on the open spaces and biodiversity and urban greening SA objectives. Mixed minor positive and minor negative effects are identified in relation to heritage assets since certain types of greening could impinge on protected viewing corridors and vistas but protection of green spaces could improve the setting of historic buildings. Mixed effects are also identified in relation to creating a safe environment because open space and GI enhances the public realm whilst generating passive surveillance, but open spaces might increase opportunities for anti-social behaviour. Registered parks and gardens are not mentioned in this part of the Plan but are protected through Historic Environment policies.
- 5.5.18. Climate Resilience and Flood Risk – policies deal with the range of actions needed to ensure that the City remains safe and comfortable in a changing climate. This covers overheating, urban heat island effect, flood risk, sustainable drainage and flood defences. Impacts were found to be mainly positive but with some minor positive and minor negative impacts in relation to the built environment and public realm and heritage assets SA objectives due to the protection these policies afford from climate impacts such as flooding compared with the potential detriment to the

setting of heritage assets of poorly designed flood defences. None of the effects identified were judged to be significant.

5.5.19. Circular Economy and Waste – this policy area addresses the City’s statutory duties as a Waste Planning Authority (WPA) setting out how the City will co-operate with other WPAs to ensure that facilities are available with capacity to manage the City’s waste arisings. Waste minimisation, circular economy principles and sustainable waste transport are covered along with criteria for provision of new waste management sites in the City. The concept of a Zero Waste City and associated requirements for on-site waste treatment were assessed as mixed against several economic and environmental objectives since there would be short term costs but long term benefits as we move towards a green economy and potential environmental impacts depending on design and management of waste facilities. But in the main these policies were seen as essential and beneficial, with minor positive effects identified in relation to the built environment and public realm SA objective, in addition to significant positive effects in relation to the waste management SA objective.

5.5.20. The Key Areas of Change – these policies identify where the greatest change is likely during the Plan period. They interpret the City Plan topic policy approaches for these areas. The assessment shows mainly positive effects, including significant positive effects in relation to the following SA objectives, in line with other policies in the Plan:

- The Temples and Thames Policy Area – these policies were assessed as having minor positive impacts on safe environment and crime reduction, heritage assets, waste management, climate mitigation and resilience, open spaces, biodiversity and urban greening, transport and movement, housing and social and cultural facilities SA objectives. A significant positive effect was identified for the Temples in relation to education, due to the special educational environment of the Temples. Significant positive effects were identified for the Thames Policy Area in relation to economic growth, the built environment and public realm, and environmental protection, due to maximisation of the opportunities for buildings and spaces on or near the riverside contribute to sustainable economic growth.
- Blackfriars – this policy was assessed to have significant positive impacts on the economy, built environment and public realm, and environmental protection SA objectives. The policy seeks to provide new high-quality office and commercial accommodation, as well as enhance accessibility.
- Pool of London – this policy was assessed to have significant positive impacts on the economy, and built environment and public realm SA objectives. Uncertainty or mixed effects were identified in relation to environmental objectives due to the policy identifying pollution reduction measures along the river but that would be hard to alleviate due to the nearby road network being problematic, particularly Lower Thames Street.
- Aldgate, Tower and Portsoken – this policy was assessed as having significant positive impacts against the economic growth and built environment and public realm SA objectives, but some uncertainty or mixed effects were identified in relation to environmental objectives. Minor negative effects were identified in relation to the waste management SA objective as development and visitor numbers will generate increased levels of construction and operational waste.

- City Cluster – this policy will significantly benefit economic development and so a significant positive effect is recorded against the economic growth objective. There is some uncertainty or mixed effects identified in relation to environmental objectives due to the scale of commercial development envisaged.
 - Fleet Street and Ludgate – this policy was assessed as having a significant positive impact on the economy, built environment and public realm and safe environment and crime reduction SA objectives, while the extension to include Ludgate Hill has significant positive impacts on the heritage assets objective through protection of views of St Paul’s Cathedral and enhancements to the character and appearance of the ancient processional route. Uncertain or mixed effects were identified in relation to the transport and movement and housing SA objectives.
 - Smithfield and Barbican– these policies will have significant positive impacts on the built environment, heritage assets and social and cultural facilities SA objectives, with minor positive effects in relation to the economy objective due to the fact the policy supports the establishment of Smithfield as a leisure destination, and promotes a retail and leisure economy that contributes to the changing uses of the area, the provision of premises suitable for start-ups, digital and creative industries, and cultural entities, including the temporary use of vacant premises, and the provision of additional hotels. This will promote economic growth due to the visitor economy and support for digital and creative industries.
 - Liverpool Street – this policy will have significant positive impacts on economic growth and transport and movement. Minor negative effects were identified in relation to the waste management SA objective as increased development will generate increased levels of construction and operational waste. Other effects identified were minor, mixed or uncertain.
- 5.5.21. Planning Contributions – The inclusion of this technical policy is assessed as mainly positive in providing guidance on what will be expected on these topics. These positive effects were judged to be significant in relation to the transport and movement SA objective. Negligible effects were identified for the Viability Assessments policy because it outlines how viability assessments must be undertaken in accordance with the NPPF, which already forms the baseline against which the policies are appraised. The guidance on viability assessments is not expected to result in any notable effects against the SA objectives.

Health Impact Assessment

- 5.5.22. The Health Impact Assessment, undertaken separately to the SA, did not find any potential negative health effects associated with the policies in the City Plan 2040. It concludes that the City Plan will have a positive impact on population health through its contribution to the wider determinants of health.

Equality Impact Assessment

- 5.5.23. The Equality Impact Assessment, also undertaken separately to the SA, did not find any potential negative impacts arising from the policies in the City Plan 2040 on people with protected characteristics. It concludes that the City Plan will have a positive impact on people in general, with differential and disproportionate beneficial impacts on identified people with some particular protected characteristics.

5.6. Assessment of significant changes made between the Proposed Submission and Revised Proposed Submission stages of the Local Plan

5.6.1. The significant changes made to the Local Plan between Proposed Submission and Revised Proposed Submission stages are summarised below in Plan order, together with a summary of how this has affected the SA assessment of relevant policies.

5.6.2. In some cases, assessment findings at Revised Proposed Submission stage have been amended due to revised judgements regarding the likely effects, but the text below focuses on changes to the effects as a result of changes to the policy wording.

Health, Inclusion and Safety

Strategic Policy S1: Healthy and inclusive City

- This is a strategic policy setting out how the City and development in the Square Mile should contribute to improving health and inclusion. References have been added to enabling communities to access opportunities for employment as well as sports provision (alongside other opportunities). A requirement has been added for development to take inclusive approaches to design. These changes reflect responses received during the previous Regulation 19 consultation in 2021 and informal engagement in 2023. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HL1: Inclusive buildings and spaces

- The main changes are amendments to fully reflect all of the protected characteristics, in line with the Equality Act; a requirement for major development to submit an equality impact assessment; and a requirement for development to promote the achievement of equity, diversity and social inclusion. The significant positive effect this policy is expected to have in relation to the Health SA objective will have a local impact within the City, rather than a regional impact, as it relates to the buildings and spaces within the City of London only.
- Supporting text has been updated to reflect these changes and to highlight how inclusive design can take neurodiversity into consideration.

Policy HL2: Air quality

- A change had been made prior to the Local Plan sub committee regarding the use of diesel generators. This has been subsequently reverted to the original approach, with supporting text amended. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HL3: Noise

- This policy previously covered both noise and light pollution. A separate design policy (DE9) covered lighting. In order to simplify the Plan, and to reflect the increased emphasis on lighting

as a result of the City Corporation's lighting charter and Lighting SPD, the lighting aspects of HL3 have been merged into policy DE9.

- The policy wording regarding noise has been clarified to distinguish between new noise-generating uses and the potential impacts of existing noise-generating uses on proposed development, with reference to the 'agent of change' principle added in relation to the latter. A requirement has been added for developers to explore opportunities to enhance the acoustic environment.
- This policy now receives a negligible effect in relation to the Economic growth, Climate mitigation and resilience and Education SA objectives.

Policy HL4: Contaminated land and water quality

- No changes have been made to the policy. As such, there have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy HL5: Location and protection of social and community facilities

- The policy has been amended to ensure that any replacement facilities are equivalent to those being replaced. The requirement for new facilities to not prejudice the business city has been removed from this policy, as it is adequately addressed under policy OF2. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HL6: Public toilets

- The policy has been amended to ensure facilities are provided for different types of users, including the provision of 'changing places' facilities. As such, the policy is now expected to have a minor positive effect in relation to the Built environment and public realm SA objective, as public conveniences, particularly 'changing places' facilities, will ensure comfort during people's visits to the City at the same time as encouraging better inclusivity.

Policy HL7: Sport and recreation

- The policy has been amended to reflect the City Corporation's aims to support a greater sport and recreation offer, and the creation of a network of facilities across the Square Mile. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HL8: Play areas and facilities

- The policy has been amended to seek additional play facilities in appropriate locations, and to ensure play facilities are designed inclusively. This issue arose during public engagement, particularly in relation to the need in and around residential areas. The policy is no longer expected to have an uncertain effect in relation to the Economic growth SA objective, as locating

play facilities in appropriate locations will reduce any impact and disturbance on workers in the City. There have been no other changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HL9: Health impact assessments (HIA)

- The requirements of the policy have been tightened to ensure that all major development undertakes an HIA. Previously, this only applied to some, with other forms able to carry out a checklist; in practice, developers are already complying with the requirement for rapid or full HIAs. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Strategic Policy S2: Safe and secure City

- The policy has been amended to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy SA1: Publicly accessible locations

- The name of the policy has been amended from 'crowded places', to reflect more up to date terminology.
- To highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.
- There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy SA2: Dispersal routes

- No substantial changes to the policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy SA3: Designing in security

- The policy has been amended to mention 'secured by design' principles and to give further advice on how Hostile Vehicle Mitigation (HVM) should be designed. The policy now receives a minor positive effect in relation to the Open space objective, as it seeks to minimise the need for HVM, which could have beneficial effects on open spaces across the City. A minor positive effect is also now expected in relation to the Transport and movement SA objective, as the policy seeks

to improve residential amenity. A mixed effect is expected in relation to the Transport and movement SA objective because although the policy seeks to minimise the need for HVM, security measures such as this have the potential to inhibit accessibility. The policy does, however, require the design and location of HVM to not adversely impact pedestrian permeability.

Housing

Strategic Policy S3: Housing

- The housing requirement for the Plan has been updated to reflect both the London Plan (up to 2029) and the requirement for housing beyond this period set out in national policy.
- An additional clause has been added that seeks to prioritise specific forms of housing in residential areas, as these reflect the majority of the City's housing need, as identified in the Strategic Housing Market Assessment. This also responds to issues raised during consultation, where respondents living in residential parts of the City were keen to ensure residential areas and the services, amenities and character of those areas were strengthened.
- The policy now receives a significant positive effect instead of a minor positive effect in relation to the Housing SA objective.

Policy HS1: Location of new housing

- The relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to support a mix of cultural and community uses in residential areas (amongst other uses), reflecting responses received during informal engagement. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HS2: Loss of housing

- The supporting text has been amended to provide guidance on those situations where amalgamation of housing units might be acceptable. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy HS3: Residential environment

- Reference to the lighting policy (DE9) has been added.
- Reference to the agent of change principle has been removed from this policy, as it is not directly applicable and is covered more clearly elsewhere in the plan. As such, the policy now receives a negligible effect in relation to the Social and cultural facilities SA objective.

Policy HS4: Housing quality standards

- The relationship of the policy to London Plan residential standards has been clarified. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy HS5: Short term residential letting

- No substantive changes to the policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy HS6: Student accommodation and hostels

- The policy has been amended to require high design and amenity standards and good connections to educational institutions. The policy now receives a minor positive effect in relation to the Health SA objective, as protection of residential amenity and a high-quality living environment is good for mental health. Supporting text has been amended to refer to GLA guidance on accessible accommodation, and to advise developers to liaise with local residents and businesses.

Policy HS7: The Temples

- The policy has been moved to chapter 14 of the City Plan (see below).

Policy HS7: Older persons housing

- The housing target for older persons housing has been amended, in line with the requirements of the SHMA. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy HS8: Self and custom housebuilding

- No changes to the policy. As such, there have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Offices

Strategic Policy S4: Offices

- The target for office floorspace has been amended to reflect the recent evidence in the City Corporation's future of offices study, with an aim to provide a minimum of 1.2m square metres of additional office floorspace over the lifetime of the City Plan.
- The policy has been amended to promote the retrofitting and upgrading of existing office buildings, reflecting responses received during recent informal public engagement.
- The policy no longer allows for office floorspace in or near identified residential areas to be lost to create additional housing and so a negligible effect is now expected in relation to the Housing SA objective. Lastly, the policy is now expected to have a minor positive effect in relation to the

Health SA objective, as it encourages affordable workspace where appropriate, reducing economic inequality.

Policy OF1: Office development

- The policy has been amended to promote retrofitting, wellbeing and circular economy design approaches, reflecting consultation responses received during public engagement. Supporting text has been updated to provide guidance on the functioning and design of office lobbies as places that can contribute to the life of the City. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as it makes provision for active frontages, which are a form of passive surveillance. The policy also now receives a minor positive effect in relation to the Health SA objective, as it encourages affordable workspaces where appropriate, reducing economic inequality thus supporting health and well-being, in addition to healthy working environments to promote well-being.

Policy OF2: Protection of existing office floorspace

- The policy has been substantially amended, to provide clarity on the situations in which the loss of office floorspace would be acceptable. The first part of the policy sets conditions that all such applications would need to meet. The second part sets out four routes for development, provided they meet the first part of the policy. These routes include the 'retrofit fast track', which was explored during public engagement. The other three routes were already set out in the previous version of the policy but have been reworded for clarity. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as it supports active frontages which are a form of passive surveillance. The policy also now receives minor positive effects in relation to both the Environmental protection and Climate mitigation and resilience SA objectives, as it reduces the need for future redevelopment by promoting retrofitting, requiring flexibility, and enabling the transformation and adaptation of space to support new uses and different occupiers. The policy does not reference heritage and so the policy no longer receives a minor positive effect in relation to the Heritage assets SA objective.

Policy OF3: Temporary 'meanwhile' uses

- The policy has been amended to encourage meanwhile uses, and to require major development that would affect existing retail units to set out how they would maintain active uses in these units prior to redevelopment. This was an issue raised during public engagement. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Retail

Policy S5: Retail and active frontages

- A clearer strategic direction to diversity and making retail areas more vibrant, including through partnership working, has been added to the policy. This reflects issues raised during public engagement, particularly in relation to areas such as the Fleet Street Principal Shopping Centre. It also responds to Destination City.

- The ‘retail links’ have been removed from the Plan, with greater support for the retention and encouragement of a broader range of ‘active frontage’ uses across the Square Mile.
- The policy now encourages the opening of retail and other uses in the evenings and weekends, reflecting the City Corporation’s Destination City vision.
- The policy now receives an uncertain effect in relation to the Heritage assets SA objective, instead of a minor positive effect, as it promotes large-scale retail development in the Principal Shopping Centres, some of which include historic markets and other heritage buildings. It also now receives a minor positive effect in relation to the Health SA objective, as the increased retail offer and ground floor frontages that improve and activate streets could encourage more walking, with beneficial effects on people’s health and well-being.

Policy RE1: Principal Shopping Centres

- No substantive changes to the policy. The wording of policy has been clarified.
- The sections setting out the strategic approach for each of the four Principal Shopping Centres (PSCs) has been amended in response to recent evidence and public engagement.
- The policy now receives a mixed effect in relation to the Safe environment and crime reduction objective, as while it increases passive surveillance there may be an increase in potential issues regarding crime and safety, such as theft. The increased offer of the area may also increase the risk of anti-social behaviour. The policy also now receives an uncertain effect in relation to the Heritage assets SA objective, instead of a minor positive effect, as it promotes large-scale retail development in the Principal Shopping Centres, some of which include historic markets and other heritage buildings. Lastly, the policy now receives a mixed effect in relation to the Transport and movement SA objective, instead of a minor positive effect, as focusing retail development in PSCs and encouraging active frontages is likely to reduce the overall need to travel, but retail uses often require frequent deliveries by vehicle.

Policy RE2: Retail links

- This policy has been deleted, with a more consistent and clear approach to active frontage uses set out in Policy RE3: Specialist retail uses and clusters.

Policy RE2: Active frontages

- This policy was previously titled ‘Ground floor retail provision elsewhere in the City’. The policy has been amended to encourage a broader range of retail and related uses across the City, and to resist the loss of active frontages. This responds to the City Corporation’s Destination City vision and recent evidence of retail demand. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as active frontages increase passive surveillance. Minor positive effects are also now expected in relation to the Housing, Social and cultural facilities and Health SA objectives, as the policy seeks to protect convenience retail units that serve residential areas, in addition to protecting residential amenity, which will have beneficial effects on health and well-being.

Policy RE3: Specialist retail uses and clusters

- This policy has been expanded in response to recent evidence of retail demand, seeking to ensure that retail provision in different parts of the City responds to its context and character. The policy is now expected to have a minor positive effect in relation to the Safe environment and crime reduction SA objective, the four PSCs are distinct from the rest of the City and their active frontages will contribute to an attractive public realm.

Policy RE4: Markets

- This policy has been amended to support markets more positively, recognising that they have the capacity to enhance existing retail areas, not simply have an adverse impact on them. This responds to an issue raised during recent informal public engagement. The policy now receives a minor positive effect in relation to the Built environment and public realm SA objective, as it seeks to improve the vibrancy of the built environment. The policy also now receives a mixed effect in relation to the Waste management SA objective, as although it may have an impact on the setting of heritage assets, its impact is also dependent on the location and management which are uncertain at this stage. Lastly, the policy also now receives minor positive effects in relation to the Housing and Health SA objectives, as in addition to protecting residential amenity, it seeks to increase the chance of spontaneous social interaction. The increased retail offer and ground floor frontages are likely to encourage more walking, with beneficial effects on people's health and wellbeing.

Culture and visitors

Strategic Policy S6: Culture and visitors

- This policy has been substantially amended, in response to the City Corporations Destination City vision and the strategic priority to transform the Square Mile as a leading leisure and cultural destination. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy CV1: Protection of existing visitor, arts and cultural facilities

- No substantive changes to the policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy CV2: Provision of arts, culture and leisure facilities

- This is a new policy, reflecting the City's vision for culture and leisure in the Square Mile. It seeks to encourage new provision of arts, culture and leisure facilities by requiring on-site facilities from very large scale development and provision (either on site, off site, or through contributions) from all major development.
- This approach will be informed by the new cultural planning framework, which will set out focal areas for cultural provision across the Square Mile.

- This issue was discussed during the recent informal public consultation, with respondents seeking to ensure that culture and leisure facilities were inclusive and accessible for all.
- The appraisal of this new policy can be found in Appendix 5 of this SA Report.

Policy CV3: Provision of visitor facilities

- No substantive changes to the policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy CV4: Hotels

- The policy relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to require provision of active uses at ground floor level in new hotel development, and to ensure hotels come forward in suitable locations. Supporting text has been updated to reflect the hotel demand identified in recent evidence. The policy now receives a minor positive effect in relation to the Transport and movement SA objective, instead of a mixed effect, as the policy supports the provision of hotels in suitable locations that provide good access to attractions, including via public transport.

Policy CV5: Evening and night-time economy

- The policy has been amended to refer to the agent of change principle. A lot of the effects recorded for this policy have been changed to negligible, as its primary purpose is to ensure that proposals for new evening and night-time entertainment and related uses are permitted where it can be demonstrated that there is no unacceptable impact on residential and environmental amenity.

Policy CV6: Public art

- No substantive changes to the policy. Wording has been amended to ensure inclusive terms are used in reference to disabled people. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Infrastructure

Policy S7: Infrastructure and utilities

- This policy has been amended to refer to the importance of infrastructure in planning for a net zero City. The City Corporation's Utility Infrastructure Strategy has been referenced in supporting text. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy IN1: Infrastructure provision and connection

- Minor changes have been made to policy to allow more flexible approaches to applications and to encourage innovative solutions to facilitate network connections. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy IN2: Infrastructure capacity

- No substantive changes have been made. The policy now receives a negligible effect in relation to the Built environment and public realm SA objective, instead of a minor positive effect, as it does not contain any reference to the efficient use of land. The policy also now receives a negligible effect in relation to the Transport and movement objective, as there is no reference to transport infrastructure within the policy.

Policy IN3: Pipe subways

- No substantive changes have been made. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Design

Strategic Policy S8: Design

- This policy has been extensively revised, clarifying approaches to sustainable design, site capacity and vibrancy. Biodiversity has been added to the policy, as has consideration of health for design approaches. The need for stakeholder engagement has been highlighted. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy DE1: Sustainable design

- This policy has been extensively revised, setting out the new 'retrofit first' approach and the need to follow the City Corporation's Carbon Options Guidance, an issue that was explored during the recent informal public engagement and raised during the previous Regulation 19 consultation.
- Parts of policy CE1 (Zero waste design) that relate to circular economy design approaches have been moved into this policy, as they are more relevant in this location.
- This policy now receives significant positive effects in relation to the Waste management and Climate mitigation and resilience SA objectives, instead of minor positive effects, as the policy now emphasises a 'retrofit first' approach and so prioritises the retention and refurbishment of existing buildings to enhance their environmental performance, which will reduce construction and deconstruction waste while also minimising embodied carbon. Further to this, the policy adopts circular economy principles, which will reduce the long term need for waste management facilities. The policy also prioritises the objectives of the City of London Local Area

Energy Plan to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments, contributing towards energy efficiency and minimising carbon emissions.

Policy DE2: Design quality

- The policy has been amended to ensure new development provides inclusive spaces, active frontages, and greening, and the need for community engagement. Supporting text has been updated. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as it promotes active frontages, which are a form of passive surveillance. The policy is also now expected to have a minor positive effect in relation to the Health SA objective, as an improved public realm and open spaces provide health benefits. It also seeks to improve permeability and pedestrian amenity, which will encourage walking and active lifestyles, whilst also protecting residential amenity. Lastly, the policy is now expected to have a mixed effect in relation to the Transport and movement SA objective. This is because although it seeks to enhance pedestrian permeability and so encourage walking, it does not address servicing and vehicle permeability.

Policy DE3: Public realm

- The policy has been extensively amended to reflect numerous aspects of how public realm can contribute to the built and natural environment, including green infrastructure, public art, seating, and other features. The need for inclusive and accessible public realm has been emphasised in the policy and expanded. The need for high quality public realm was identified during public consultation, particularly in relation to Key Areas of Change. The policy now receives a minor positive effect in relation to the Waste management SA objective, as the provision of free drinking water fountains as proposed by the policy will reduce the use of plastic bottles and associated waste. The policy is also now expected to have a minor positive effect in relation to the Transport and movement SA objective, instead of a mixed effect, as it promotes active travel and active frontages, which can be engaging and so increase footfall.
- Supporting text has been updated in line with the refreshed policy approach.

Policy DE4: Pedestrian permeability

- The policy has been merged with policy AT1: Pedestrian movement, permeability and wayfinding, to avoid repetition and improve clarity. The policy has been deleted from this location.

Policy DE5: Terraces and elevated public spaces

- The functioning of policy requirements for roof terraces and viewing galleries has been strengthened, with additional reference to complementary cultural and leisure facilities to create a mixture of destinations. The policy is now expected to have a minor positive effect in relation to the Safe environment and crime reduction SA objective, as it seeks to address safety and security risks, including through the incorporation of Hostile Vehicle Mitigation. The policy is

also now expected to have a minor positive effect in relation to the Health SA objective, as it seeks to protect residential amenity.

Policy DE6: Shopfronts

- Minor amendments to the policy have been made to emphasise the need to create active frontages and consider the use of awnings. The policy is now expected to have a minor positive effect in relation to the Economic growth SA objective, as enhancing shopfronts could contribute positively towards the City's vibrancy and support economic growth. A minor positive effect is also now expected in relation to the Safe environment and crime reduction SA objective, as the policy promotes active frontages, which are a form of passive surveillance. Minor positive effects are also now expected in relation to the Environmental protection, Climate mitigation and resilience and Health SA objectives. This is because in terms of environmental protection, the policy requires measures to reduce the impacts of internal and external lighting to reduce the potential for light spillage and protect the amenity of light-sensitive uses. With regard to climate mitigation and resilience, the policy embeds climate resilience into design. With regard to health, the policy seeks to deliver improvements in air quality, open space and views, which will improve amenity and the wellbeing of users. Lastly, the policy receives a negligible effect in relation to the Heritage assets SA objective, as it does not specifically reference the historic environment.

Policy DE7: Advertisements

- Minor changes to the policy have been made to support flags and banners where appropriate for cultural institutions, and the use of advertisements associated with one-off events in the City. The policy now receives a minor positive effect in relation to the Economic growth SA objective, as flags and banners could help support cultural institutions, whilst high-quality temporary advertising for one-off events may encourage more people to the area. The policy also now receives a mixed effect in relation to the Social and cultural facilities SA objective, instead of a minor negative effect. This is because although a restrained approach to advertising may impact on the City's vibrancy, what is permitted is still likely to support cultural institutions and one-off events.

Policy DE8: Daylight and sunlight

- The policy has been amended to refer to a broader range of sensitive receptors that could be impacted by loss of daylight or sunlight, and to refer to daylight and sunlight levels in historic interiors. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy DE9: Lighting

- The broad thrust of the policy remains, however it has been amended in line with the approach set out in the City Corporation's Lighting SPD and best practice. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as a safe and functional public realm is now promoted through the policy. The policy also now receives a minor positive effect in relation to the Health SA objective, as it requires measures to reduce the

impacts of internal and external lighting to reduce the potential for light spillage and protect the amenity of light-sensitive uses.

Transport

Strategic Policy S9: Transport and servicing

- Minor changes have been made to the policy to reflect current approaches on the restriction of on-street parking. The policy is now expected to have a significant positive effect in relation to the Climate mitigation and resilience SA objective, instead of a mixed effect, as it seeks to reduce vehicle numbers and promote infrastructure for alternative-fuel vehicles and zero emissions vehicles, which will reduce CO₂ emissions and so help mitigate climate change. The policy is also expected to have a significant positive effect in relation to the Transport and movement SA objective, instead of a minor positive effect, as in addition to reducing vehicle numbers, it aims to provide safe, more attractive streets with lower pollution levels.

Policy VT1: The impacts of development on transport

- This policy has been revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices. The policy is now expected to have minor positive effects in relation to the Built environment and public realm and Safe environment and crime reduction SA objectives, as it seeks to promote enhancements to the quality of the City's streets and public spaces, in addition to supporting development that will have a positive impact on highways safety, with consideration given to vehicle related safety, including terrorist incidents.

Policy VT2: Freight and servicing

- Minor changes have been made to the policy, including reference to the use of servicing lifts in appropriate locations.
- Wording in the policy has been clarified around servicing hours and sustainable deliveries.
- revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.
- There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy VT3: Vehicle parking

- Reference to the use of underutilised car parks as last mile delivery hubs has been removed, however support for their alternative transport uses has been retained. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Policy VT4: River transport

- This policy has been amended to give greater emphasis to river-based transport of people and freight, and to resist permanent moorings of vessels, in line with the aim to create a more inclusive, welcoming and vibrant riverfront. The policy now receives a minor positive effect in relation to the Economic growth SA objective, as increases in passenger and freight transport by river to/from the City could have beneficial effects on the economy. The policy also now receives minor positive effects in relation to the Built environment and public realm and Heritage assets SA objectives, as the permanent mooring of vessels will be resisted, which will preserve views, heritage and archaeology, enhancing public enjoyment of the riverfront.

Policy VT5: Aviation landing facilities

- No changes have been made to this policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Strategic Policy S10: Active travel and healthy streets

- The policy has been amended to reflect the recently updated Transport Strategy, including placing increased emphasis on inclusion and prioritising the needs of people walking and wheeling. Explicit reference to the healthy streets approach has also been added to the policy. The policy now receives a significant positive effect in relation to the Built environment and public realm SA objective, instead of a mixed effect, as it promotes the Healthy Streets Approach in development proposals and improvements to the public realm, making the public realm safer, more attractive and inclusive for pedestrians.

Policy AT1: Pedestrian movement, permeability and wayfinding

- This policy has been amended to reflect the requirements of policy DE4, which set out closely related policy requirements.
- An addition to the policy has been made in relation to the need to improve wayfinding through a variety of means.
- The policy now receives a significant positive effect in relation to the Transport and movement SA objective, as it seeks to improve the quality and permeability of the City's streets.

Policy AT2: Active travel including cycling

- A reference has been added to the London cycling design standards. Supporting text advises that accessible shower and changing facilities should be provided in appropriate new development. The policy now receives a significant positive effect in relation to the Transport and movement SA objective, as it facilitates active travel.

Policy AT3: Cycle parking

- This policy has been amended to require cycle parking to be conveniently located, easily accessible, safe and secure. Supporting text has been amended to advise that a proportion of cycle parking spaces should flexibly provide storage and charging for e-bicycles and mobility scooters. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Heritage and Tall Buildings

Policy S11: Historic environment

- This policy has been extensively altered. Additional emphasis has been placed on the need to celebrate the City's heritage and promote public enjoyment of historic spaces and buildings in ways that are inclusive and accessible. The policy encourages heritage-led placemaking, the retrofit of historic buildings and collaboration between heritage sites and other adjacent developments. The need to adequately protect the City's heritage was raised during both the Regulation 19 and informal public engagement, and these responses have informed the policy direction. The mixed effect this policy is expected to have in relation to the Economic growth SA objective will have a regional impact within the rest of London, rather than a local impact, as the heritage assets present in the City attract many visitors to London. The policy is now expected to have a minor positive effect in relation to the Climate mitigation and resilience SA objective, as it encourages retrofitting, which will help reduce carbon emissions and so help mitigate climate change. A negligible effect is now expected in relation to the Biodiversity and urban greening SA objective, as there is no reference to biodiversity.

Policy HE1: Managing change to the historic environment

- The policy has been amended to require submission of statements of significance and heritage impact assessments. Specific wording has been added to reflect the wording of national policy in relation to heritage harm.
- An additional requirement has been set out in policy for developments to conserve and enhance the immediate setting of Bevis Marks Synagogue and The Monument; issues relating to the former were raised extensively during the Regulation 19 consultation and flagged during the recent informal public engagement.
- A negligible effect is now expected in relation to the Biodiversity and urban greening SA objective, as there is no reference to biodiversity.
- Supporting text has been extensively revised to reflect these changes and best practice in conservation.

Policy HE2: Ancient Monuments and archaeology

- The policy has been amended to require artefacts or deposits to be preserved in-situ. The policy is now expected to have a mixed effect in relation to the Heritage assets SA objective, instead of

a significant positive effect, as while it seeks to protect the historic environment, there is some tension between access to and subsequent protection of historic significance.

Policy HE3: Setting of the Tower of London World Heritage Site

- The policy has been amended to reflect requirements for Heritage Impact Assessments, and for development in the area to contribute to pedestrian and cycle routes, including through wayfinding improvements. The policy is now expected to have a minor positive effect in relation to the Transport and movement SA objective, as it seeks to enhance pedestrian and cycle routes, including signage and wayfinding.

Strategic Policy S12: Tall buildings

- The policy has been extensively amended, reflecting the approach required to comply with the London Plan and recent evidence in relation to character areas and tall building areas.
- The first part of the policy gives a definition for tall buildings in the City. The next few sections give design guidance. The latter part of the policy sets out where tall buildings would be appropriate, and how developments should identify appropriate heights for tall buildings. Supporting text has been updated accordingly.
- Minor positive effects are now expected in relation to the Transport and movement, Social and cultural facilities and Health SA objectives. This is because in terms of transport and movement, the policy seeks to improve the public realm and ensure adequate space is provided between buildings so as to improve the pedestrian experience. With regard to social and cultural facilities, the policy now seeks to protect existing open spaces while providing new open spaces inside and at the top of buildings. Encouraging active transport and access to open spaces will have beneficial effects on people's health and wellbeing. With regard to health, the policy ensures safe and comfortable levels of wind shear, daylight and sunlight, in addition to inclusive and accessible design.

Strategic Policy S13: Protected Views

- A minor amendment to the policy has been made to require development to have regard to views of the City that have been designated by other local planning authorities. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.
- Extensive additions have been made to the supporting text to reflect the operation of St Paul's Heights as set out in the Protected Views SPD.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open spaces and green infrastructure

- A minor amendment has been made to the policy to reference the green corridors that have been identified to link up the City's Sites of Importance for Nature Conservation (SINC). There

have been no changes to the effects this policy is expected to have since Proposed Submission stage.

- Supporting text has been revised to more clearly set out the importance of open spaces and green infrastructure in the Square Mile.

Policy OS1: Protection and provision of open spaces

- The broad approach in the policy remains as previously but wording has been revised to provide additional clarity and to emphasise the need for inclusive, accessible public open spaces. Supporting text has been revised to more clearly set out the importance of inclusive and welcoming open space. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy OS2: Urban greening

- Minor changes have been made to the policy to emphasise the need for maintenance of green features. Supporting text has been shortened and clarified, with reference to new London Plan guidance on urban greening added. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy OS3: Biodiversity

- Minor changes have been made to the policy to recognise that green walls may not be appropriate ways to increase biodiversity in all cases. Supporting text has been revised to reference the City Corporation's Biodiversity Action Plan. The policy now receives a minor positive effect in relation to the Education SA objective, as it promotes opportunities such as citizen science and school projects, in addition to records collected by local voluntary individuals and groups (supporting text).

Policy OS4: Biodiversity Net Gain

- This is a new policy, reflecting the imminent requirement set out in legislation for development to provide net gains in biodiversity. Because of the existing low levels of biodiversity in the City, a more relevant approach seeking absolute increases (rather than a percentage uplift) has been set out in policy, supported by recent evidence. The appraisal of this new policy can be found in Appendix 5 of this SA Report.

Policy OS5: Trees

- A minor amendment has been made to refer to the green routes that have been identified to link up the City's SINCs. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Climate Resilience

Strategic Policy S15: Climate resilience and flood risk

- A requirement has been added for development to contribute to wider climate resilience measures. The timeline for raising flood defences has been brought forward, in line with recent evidence. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as climate resilience and flood measures will help keep the public safe.

Policy CR1: Overheating and urban heat island effect

- No amendments have been made to the policy. As such, there have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy CR2: Flood risk

- No amendments have been made to the policy (other than typographical changes). As such, there have been no changes to the effects this policy is expected to have since Proposed Submission stage.

Policy CR3: Sustainable Drainage Systems (SuDS)

- No amendments have been made to the policy (other than typographical changes). The policy is considered to have a minor positive effect in relation to the Open spaces SA objective, as SuDS often comprise open space.

Policy CR4: Flood protection and flood defences

- No amendments have been made to the policy. As such, there have been no changes to the effects this policy is expected to have since Proposed Submission stage. In supporting text, the timeline for raising flood defences has been brought forward, in line with recent evidence.

Circular Economy and Waste

Strategic Policy S16: Circular economy and waste

- No amendments have been made to the policy (other than typographical changes). The policy is, however, considered to have a significant positive effect in relation to the Waste management SA objective, instead of the minor positive effect. A negligible effect is now expected in relation to the Health SA objective. The London Plan apportionments have been updated in supporting text to most recent London Plan.

Policy CE1: Zero Waste City

- The policy has been split and merged into Policy DE1: Sustainable design and Policy CE2 (renumbered CE1: Sustainable waste facilities and transport).

Policy CE1: Sustainable waste facilities and transport

- No amendments have been made to the policy. Part of previous policy CE1 (Zero Waste City) and relevant supporting text have been incorporated into this policy. The policy now receives a mixed effect in relation to the Economic growth SA objective, as although the Corporation will support businesses towards a Zero Waste City, this will have a short term cost. However, there will be long term benefits as the City shifts to a green economy. The policy now receives a minor positive effect in relation to the Heritage assets SA objective, as positive waste planning and incorporating waste storage within heritage assets will keep the built environment clear of unsightly waste. For these reasons and the fact operational waste requirements must contribute to BREEAM requirements for waste credits (supporting text), a significant positive effect is expected in relation to the Waste management SA objective. A minor positive effect is also now expected in relation to the Housing SA objective, as well-designed waste storage improves residential amenity. Lastly, a mixed effect is now expected in relation to the Health SA objective, instead of a minor positive effect, as although the policy supports better waste management, provision of a single collection facility in major development could result in overflow and unsanitary conditions.

Policy CE3: New waste management sites

- A minor clarification has been made to the policy to be clear that the relevant part applies to waste facilities that generate energy from waste. The policy now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, as development will be resilient to natural and man-made safety and security challenges.

The Temples, the Thames Policy Area, and the Key Areas of Change

Policy TP1: The Temples

- This is a new policy, replacing the previous Temples policy (HS7). It better reflects and seeks to support the functioning of the Temples as places of learning, training and collegiate facilities alongside housing and workspaces for barristers and students. The previous policy sought to retain a balance between housing and workspaces in the area; this approach no longer reflects the optimal functioning of the area as a place to support the legal profession.
- The policy also recognises the important historic character of the Temples, encourages sensitive adaptation and accessibility improvements, and seeks opportunities to encourage improvements to the public realm and open spaces.
- The appraisal of this new policy can be found in Appendix 5 of this SA Report.

Strategic Policy S17: Thames Policy Area

- The policy has been amended to emphasise the need for additional inclusive public space along the riverfront. Clarification has been given in respect of moored vessels. Supporting text has been shortened and repetition removed. The policy now receives a significant positive effect in relation to the Economic growth SA objective, instead of a minor positive effect, as promoting office-led commercial development is expected to contribute significantly towards economic growth. The policy also now receives a minor positive effect in relation to the Safe environment and crime reduction SA objective, instead of an uncertain effect, because although the potential increase in people visiting the area could result in an increase in anti-social behaviour, the policy supports active frontages, which are a form of passive surveillance, in addition to safeguarding land for the Thames Tideway Tunnel project, which would result in improvements to prevent sewerage from entering the Thames.

Strategic Policy S18: Blackfriars

- The policy has been amended to support the provision of an eastern entrance to Blackfriars Station, providing access to the riverfront. Encouragement has also been given to provision of sport, leisure or recreation facilities for the area below the Blackfriars undercroft. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. The policy now receives a significant positive effect in relation to the Economic growth SA objective, as the comprehensive redevelopment of this area to provide new high-quality office and commercial accommodation would support economic growth. The policy also now receives a minor positive effect in relation to the Safe environment and crime reduction objective, instead of an uncertain effect, because although the potential increase in people visiting the area could result in an increase in anti-social behaviour, the policy supports active frontages, which are a form of passive surveillance, in addition to incorporating implementation of the Thames Tideway Tunnel project, which would result in improvements to prevent raw sewerage from entering the Thames. Lastly, the policy now receives a minor positive effect in relation to the Health SA objective, as Blackfriars Bridge foreshore (Bazalgette Embankment) will include a civic space, green terraces, and a venue for outdoor events, sports, leisure, and recreation, alongside public artwork (supporting text), which will increase people's enjoyment of the area and subsequent well-being.

Strategic Policy S19: Pool of London

- The updated policy aims to make the most of opportunities to provide ample public open spaces along the Thames riverfront, enhance pedestrian access, and optimize the use of heritage assets, with the aim of transforming riverfront into a lively and attractive destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. The policy now receives a significant positive effect in relation to the Economic growth SA objective, as the redevelopment of this area to provide new high-quality office and commercial accommodation will support economic growth. The policy is also now expected to have a minor positive effect in relation to the Health SA objective, as in addition to making the riverfront more vibrant and accessible, it encourages the provision of recreation, cultural events, arts and play in public spaces – all of which contribute to a person's enjoyment and overall well-being.

Strategic Policy S20: Aldgate, Tower and Portsoken

- The updated policy emphasises the need to deliver a more diverse mix of developments in the area and support the revitalisation of the Mansell Street Estate. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. There have been no changes to the effects this policy is expected to have since Proposed Submission stage, although some of the reasoning behind the effects has been amended.

Strategic Policy S21: City Cluster

- This policy has been extensively amended. City Cluster has been identified as one of the areas appropriate for tall building development. The revised policy emphasises the need to transform Leadenhall Market into a vibrant destination and encourages to enhance its leisure and retail offer. The policy strengthens the requirement for providing free to enter and publicly accessible elevates spaces. Policy further emphasises the need to respect the immediate setting of Bevis Marks Synagogue. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. The policy is now expected to have an uncertain effect in relation to the Waste management SA objective, instead of a minor negative effect. This is because although development activity will generate increased construction and operational waste, the supporting text to the policy states that this concentration of activity will require specialised approaches to freight and servicing, including the use of consolidation. Lastly, the policy is now expected to have an uncertain effect in relation to the Social and cultural facilities SA objective, instead of a minor positive effect, as although the policy promotes vibrant cultural activities and amenities, such as retail, food and beverage, and complementary uses through extending Leadenhall Market into a seven day-week destination, this may have an impact on the amenity of residents and meet visitors needs rather than their own.

Strategic Policy S22: Fleet Street and Ludgate

- The policy has been amended to identify Fleet Street as an area appropriate for tall buildings and emphasises the need to strengthen the retail provision along the Principal Shopping Centre. It also highlights the need to diversify the offer by providing cultural and leisure facilities. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. In this SA, the minor positive effects against the Economic growth and Safe environment and crime reduction SA objectives have been upgraded to significant positive effects. This is because with regard to the economy, the enhanced cultural offer on the area together with the development of new court facilities and office-led redevelopments, will contribute significantly towards economic growth. With regard to safety, the policy now seeks to improve safety in the courts and alleyways that lead off Fleet Street and Ludgate Hill, in addition to improving the capacity, accessibility and safety of the public realm. The delivery of new court buildings and police facilities a Salisbury Square will also help tackle cybercrime, fraud, and economic crime in London. Lastly, a minor positive effect is now expected in relation to the Education SA objective, as the policy seeks to use the area's rich history and connection to the legal, publishing and newspaper industries to its advantage, attracting tourism to the area and increasing people's understanding of it.

Strategic Policy S23: Smithfield and Barbican

- The policy has been updated to provide greater support to the provision of hotels in appropriate locations along with leisure and retail uses. In addition, it encourages the provision of spaces suitable for other complementary uses such as start-ups, creative industries and meanwhile uses. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. There is no longer reference to educational activities as part of the Culture Mile proposals and so a negligible effect is now expected in relation to the Education SA objective.

Strategic Policy S24: Culture Mile Implementation

- The policy has been removed, following the wrapping up of the Culture Mile initiative.

Policy SB1: Culture Mile Impacts

- The policy has been removed, following the wrapping up of the Culture Mile initiative. Other policies address the need to mitigate impacts of cultural, night time economy and other uses.

Strategic Policy S24: Smithfield

- This policy has been revised to encourage the growth of the area's retail and leisure economy with a particular focus on establishing Smithfield as a leisure destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. The policy previously referenced the Culture Mile and the fact it would attract more visitors to the area, which would improve surveillance but could increase antisocial behaviour. As this reference has since been removed, the policy now receives a negligible effect in relation to the Safe environment and crime reduction SA objective. The policy receives a minor positive effect in relation to the Education SA objective, as it supports the continued presence of St Barts and recognises its importance as a renowned teaching hospital and centre for excellence.

Strategic Policy S26: Liverpool Street

- This policy has been revised to set out area based priorities for placemaking, aiming to enhance the overall visitor experience by public realm enhancements and improving wayfinding; and connectivity to nearby local destinations. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy. The policy previously promoted the area as a gateway to Culture Mile. As this reference has since been removed as a result of the wrapping up of the Culture Mile initiative, the policy now receives a negligible effect in relation to the Social and cultural facilities SA objective.

Implementing the City Plan

Strategic Policy S27: Planning contributions

- This policy has been updated to include the requirement for securing contributions for cultural provision, highway and public realm enhancements. The policy now receives a minor positive effect in relation to the Social and cultural facilities SA objective, as it now provides funding for cultural provision.

Policy PC1: Viability Assessments

- This policy sets out how the City Corporation will expect developers to approach viability, and sets out how the City Plan will be monitored. There have been no changes to the effects this policy is expected to have since Proposed Submission stage.

COVID-19

5.6.3. In response to the COVID-19 pandemic, a number of updates were made to the text throughout the City Plan 2040, in addition to Policies HS4 (Housing Quality Standards) and RE5 (Markets). Policy HS4 now requires the provision of amenity space for individual units and where possible, outdoor space. Policy RE5 now places an increased emphasis on pop-up and meanwhile uses to minimise vacancies of retail premises whilst a long-term occupier is sought. These changes were considered minor and did not result in any changes to the SA findings.

5.6.4. The effects of COVID-19 in the longer term are uncertain. Although there has been a shift to remote working, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly with a blended approach of in-office and remote working.

Use Classes Order

5.6.5. The changes to the Use Classes Order introduced in September 2020 also resulted in a number of updates to the text in the City Plan 2040, in addition to Policies S1 (Healthy and inclusive City), S4 (Offices), OF3 (Temporary 'meanwhile' uses), S5 (Retail and active frontages), RE1 (Principal Shopping Centres) and S22 (Fleet Street and Ludgate). These changes were mainly focused on the new Class E commercial, business and service use, whereby Class E uses can be converted to other Class E uses without planning permission. Policy OF3 (Temporary 'meanwhile' uses) now references the new Class E use, whilst Policies S1 (Healthy and inclusive City) and S4 (Offices) state that conditions will be attached to permissions to ensure their future retention where necessary. Reference to A1 uses has been replaced by 'comparison and convenience' uses in Policies S5 (Retail and active frontages), RE1 (Principal Shopping Centres) and S22 (Fleet Street and Ludgate) because Class A1 was revoked when the new Use Classes Order came in.

5.6.6. With the exception of Strategic Policy S4 (Offices), the changes outlined above did not result in any changes to the SA findings. In addition to the new Class E use, Strategic Policy S4 now includes reference to the transformation of space to support new uses. Ensuring that new floorspace is designed to enable transformation of space, will reduce the need for redevelopment and associated construction waste.

Therefore, the negative effect recorded against the waste management SA objective was changed to a mixed minor positive and minor negative effect.

Visit from Planning Inspector (PINS)

- 5.6.7. The City of London had a virtual advisory visit from a Planning Inspector in 2020 and updated the City Plan 2040 in response to advice received. Minor amendments were made to the wording throughout the Plan, in addition to Policies HL2 (Air quality), S2 (Safe and secure City), S3 (Housing), HS7 (Older Persons Housing), S20 (Aldgate, Tower and Portsoken), S23 (Smithfield and Barbican). The changes were generally considered minor and with the exception of Strategic Policy S23 (Smithfield and Barbican), did not result in any changes to the SA findings.
- 5.6.8. Strategic Policy S23 (Smithfield and Barbican) now refers to residential development so that it is consistent with the distribution of development set out in the Spatial Strategy. Therefore, the uncertain effect against the housing SA objective was changed to a mixed minor positive and minor negative effect.
- 5.6.9. The detailed assessments for each of the Plan policies can be found in Appendix 5.

5.7. Cumulative effects of Revised Proposed Submission City Plan 2040 and other plans on SA objectives

- 5.7.1. SA of the Revised Proposed Submission City Plan 2040 shows that the policies will have largely positive impacts. Where uncertain impacts were identified, mitigation has been proposed often through other policies in the Plan or through minor wording changes.
- 5.7.2. The effect of the Revised Proposed Submission City Plan 2040 as a whole, against each objective is summarised in this section.
- 5.7.3. **Economic growth** – The City Plan 2040 will largely sustain economic growth and employment opportunities, providing flexible office floorspace catered to people’s changing needs via the policies outlined in the ‘Offices’ section of the Plan together with suitable commercial floorspace, thereby supporting economic growth at a local, regional, national and international scale. One of the Economic objectives of the Plan is to deliver a minimum of 1.2 million sqm net additional office floorspace by 2040. The Key Areas of Change will also help achieve this objective. The City Plan’s approach to visitors (including through the Destination City initiative) will also be beneficial in terms of supporting economic growth (e.g. through the night-time economy) – particularly following COVID-19, as growth is not solely reliant on people coming into the City for work. The City Corporation’s Destination City vision recognises the crucial role that culture and visitors will have to play in creating a more vibrant Square Mile that is a welcoming destination for everyone. Further to this, Strategic Policy S6: Culture and visitors seeks the development of a wide range of cultural, leisure and recreational facilities across the City. Some uncertainty is expected in relation to the transport and what effect servicing and consolidation works might have on economic growth. Increasingly, global and local businesses accept corporate social responsibility as an integral part of their business models therefore providing an environment that caters for this is paramount.
- 5.7.4. The cumulative impact of implementation of the City Plan 2040 alongside adopted plans for London’s economy such as the Mayor’s Economic Development Strategy and the London Plan will enable the City to maintain its position as a global leader in finance and business sectors with an internationally recognised agglomeration of

offices. London Plan policies that seek to make the best use of land and grow a good economy will reinforce the City's policies to sustain economic growth and employment opportunities locally, regionally, nationally and internationally – maintaining the City's status as a leading international financial and business centre. The major uncertainty for the economy is the long-term impact of COVID-19 alongside the UK's departure from the European Union.

- 5.7.5. **Built environment and public realm** – The SA shows that the proposed policies in the City Plan 2040 will have largely positive impacts at a local level in terms of providing an attractive, efficient, inclusive, accessible and digitally connected built environment and public realm. Strategic Policy S8: Design sets out a range of requirements covering issues ranging from sustainable design, form and layout, the experience of spaces, and the quality and character of buildings. Further to this, Policy DE1: Sustainable design sets out a 'retrofit first' approach, requiring all major development to identify the most sustainable and suitable approach for the site. The policy also sets high standards for environmental performance of new buildings, approaches that mitigate climate impacts, and design that is informed by circular economy approaches. Policy CV6: Evening and night-time economy supports public art in appropriate locations that consider the safety of pedestrians and road users, and those who may have mobility problems, whilst a number of the Key Area of Change policies outline the intended direction for the development of these areas, in addition to supporting improvements to the public realm and increased permeability. Policy DE2: Design quality requires an exemplar standard of design, including high quality detailing, finishes and materials, Policy DE3: Public realm supports the delivery of a high-quality and accessible public realm, whilst the Culture policies in Chapter 7 of the City Plan set out the ways in which the cultural offer of the City will be protected and enhanced. Given the urban nature of the City, the policies in the City Plan relating to the built environment will be particularly important in mitigating the potential negative effects of new development on this objective. For example, security measures have the potential to be negative for accessibility and public realm enhancement, and so must be sensitively designed. Improved vibrancy could change the character of some parts of the City but is generally supported by City workers.
- 5.7.6. The City Plan 2040 is aligned with the City's Transport Strategy and public realm enhancement strategies which together take account of the London wide transport, cycling and infrastructure strategies and plans for the Central Activities Zone (CAZ). The London Plan's policies that seek to make the best use of land, create a healthy city and increase efficiency and improve resilience will contribute to achievement of an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities in the City. This is also supported by the Mayor of London's Expanding London's Public Realm Design Guide and Public London Charter, which provide guidance for the design of internal, semi-internal and elevated public spaces in London, including how they will be accessible, inclusive, well maintained and serviced.
- 5.7.7. **Safe environment and crime reduction** – Some City Plan 2040 policies aimed at providing a livelier environment in the City could potentially increase anti-social behaviour, but increased vibrancy provides passive surveillance against low level crime. Passive surveillance is supported through a number of policies that require the incorporation of active frontages into development. Further to this, many of the policies require development proposals to encourage a mix of uses alongside natural

surveillance of streets and spaces, design-out crime and develop area-based approaches to implementing security measure. Strategic Policy S2: Safe and secure City and Policy DE5: Terraces and elevated public spaces addresses this objective by treating safety and security as inherent parts of site design. The transport policies also seek to create a safer environment, particularly for pedestrians and cyclists. Policy DE9: Lighting also contributes towards this objective by ensuring new developments are well-lit, including the public spaces around them so as to increase feelings of safety. The City Plan may, however, be limited in how it can address this objective as it cannot directly influence levels of crime. There are numerous references throughout the Plan to managing Hostile Vehicle Mitigation (HVM) where it is required, including in Policies SA3: Designing in security and DE5: Terraces and Viewing Galleries. Although HVM could have an adverse visual impact on the public realm and hinder pedestrian permeability, the Plan tries to prevent this through careful consideration of accessibility requirements. The policy on tall buildings applies the Civil Aviation Authority's maximum height limit for the safety of international flights.

- 5.7.8. The City Plan 2040 will provide the spatial implementation of actions in the City of London Policing Plan and the safer City Partnership strategic plan. This is strengthened by the Mayor's Police and Crime Plan and national anti-terrorism programmes. The London Plan seeks to promote strong and inclusive communities which further supports the City's objective of reducing crime and antisocial behaviour, managing and responding to the security challenges that the City faces.
- 5.7.9. **Heritage assets** – Policies throughout the City Plan 2040 but particularly in Chapter 14: Historic environment strongly support the protection of heritage assets and their settings as a key part of the City's environment. According to Policy S11, the City's historic environment will be placed at the heart of placemaking, protected, celebrated and positively managed. Access to the historic environment will be enhanced so as to increase the number of opportunities available for workers, residents and visitors to enjoy the historic environment and learn from it. Retrofitting is supported so as to improve the environmental standards of historic buildings but together with infrastructure, could have negative impacts and so must be sensitively designed. Other policies that address high quality design more generally should also provide mitigation for the potential impacts of new development on heritage assets and their settings in and around the City.
- 5.7.10. National and London-wide heritage protection overseen by Historic England and the GLA provide the framework for the City Plan 2040's heritage protection policies and the London Plan's heritage, culture and View Management Framework ensure wider protection where necessary. More specifically, the London Plan together with London's World Heritage Sites SPD, set out policies and guidance to conserve and enhance London's World Heritage Sites and their settings, which includes the Tower of London. The cumulative impact of these plans will assist the City in conserving and enhancing the significance of heritage assets and their settings, enabling public appreciation and access wherever possible.
- 5.7.11. **Waste management** – Offices, retail and markets policies in the City Plan 2040 have the potential for negative impacts on waste as do policies on hotels and the night-time economy. However, the process of redevelopment in the City where buildings are often demolished to make way for new ones creates the biggest potential impact on waste. The City Plan has adopted a 'retrofit first' approach

whereby there is a requirement for maximum retention and retrofit of existing buildings while allowing redevelopment where it would be more sustainable or suitable. This will drastically reduce construction and deconstruction waste. The transformation and adaptation of space, circular economy principles and resource conservation as required by the City Plan will be essential during the Plan period.

- 5.7.12. The City of London has an agreement with the London Borough of Bexley and the South-East London Joint Waste Planning Group (Brexley, Bromley, Greenwich, Lewisham and Southwark) to manage the City's waste apportionment. Waste Planning Authorities inside and outside London where the City's waste is deposited will need to continue accepting waste from the City. This will be helped by waste minimisation and circular economy principles which are promoted in the London Plan and the London Environment Strategy. Together these plans will help to decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings. Projects like the Thames Tideway Tunnel will also help in sewage management.
- 5.7.13. **Environmental protection** – Many of the policies in the City Plan 2040 have positive impacts on environmental protection, contributing to carbon emission reductions, air and water quality improvements and noise and light pollution abatement. However, some policies including retail, night-time economy, river transport and short-term residential lets were seen as having potential negative impacts. Approaches such as 'retrofit first' identified in Policy DE1: Sustainable design should help achieve better environmental protection through minimising embodied carbon, alongside the incorporation of sustainable design and construction measures to recognised standards. Encouraging more active and sustainable travel which a number of the policies do should also help reduce emissions, in addition to air pollution. Two of the Key Areas of Change, the Thames Policy Area and Blackfriars, support construction of the Thames Tideway Tunnel, which will help prevent raw sewerage from entering the Thames and the associated negative effect on water quality.
- 5.7.14. Environmental protection is strongly supported through the London Environment Strategy, the Mayor's Transport Strategy and the London Plan (particularly those in the 'Design and character' section), providing a wider drive to reduce pollution. The amended Building Regulations 2010 and the Future Building Standard from 2025 will also work alongside these policies to ensure that new build homes and other buildings, including offices and shops, generate 30% lower emissions than current standards. The Thames Tideway Tunnel will also help address existing water quality issues by preventing raw sewage from entering the Thames. Since pollution does not respect borough boundaries this will in turn assist the City's objective to maximise protection and enhancement of the natural environment.
- 5.7.15. **Climate mitigation and resilience** – Office and retail policies within the City Plan 2040 were identified as having the potential for negative impacts on climate change mitigation due to the heating and cooling requirements of offices and subsequent energy demands. However, reduced reliance on the private car as a result of Plan provisions designed to improve the public realm and walking and cycling connectivity will contribute towards climate change mitigation. The City Plan requires buildings to achieve high levels of environmental performance, which will help reduce emissions associated with buildings and their overall contribution to climate change. There is, however, potential for these high environmental standards

to make development less viable. The City Plan includes a number of aspirational policies seeking to adapt to the effects of climate change, particularly in the 'Climate Resilience' section. Policies such as S15: Climate resilience and flood risk and CF1: Overheating and urban heat island effect set out wide ranging measures that will combine to help achieve this objective. The 'Design' section of the City Plan also contains policies that require development in the City to adhere to high standards of design and construction to help achieve a zero carbon City by 2040.

- 5.7.16. Climate mitigation and resilience are strongly supported at national level through the BEIS Clean Growth Strategy and at regional level by the Mayor's Environment Strategy and London Plan. London Plan carbon targets form the basis of the carbon reduction policies in the City Plan 2040, supporting the SA objective of mitigating climate change, assisting in maintaining energy security and promoting climate change resilience. The Mayor of London has set a target for London to be net zero carbon by 2030. In order to achieve this by 2030, there will need to be a 40% reduction on the total heat demand of buildings, 2.2 million heat pumps in operation in London, 460,000 buildings connected to district heating networks, a 27% reduction in distance travelled by cars and a ban on fossil fuel car and van sales⁷. In terms of reducing emissions from transport sources, the policies outlined in the previous column in conjunction with expansion of the Ultra Low Emission Zone and a shift to electric vehicles, will help reduce emissions associated with private vehicles. All of these measures will combine to help achieve climate change mitigation and adaptation.
- 5.7.17. **Open spaces, biodiversity and urban greening** – The impact of City Plan 2040 policies on the Open space objective was assessed as mainly positive with protection for the City's public open spaces and a drive for greening the City through an urban greening target and a requirement to achieve 3 biodiversity units on-site per hectare. Many of the policies support open space provision and enhancements to the public realm. One of the Key Areas of Change, Blackfriars, will include a civic space, green terraces and a venue for outdoor events, sports, leisure and recreation. Flood risk and sustainable drainage policies also have the potential to make a positive contribution depending on their design. Various policies contained within the City Plan, particularly those in the 'Open Spaces and Green Infrastructure' section, specifically aim to conserve and enhance biodiversity, with positive effects on biodiversity and urban greening. The cumulative impact of these policies will be positive.
- 5.7.18. The Mayor's Environment Strategy encourages biodiversity enhancement across London. Coupled with the London Plan which implements urban greening, this assists in the City's objectives to enhance provision and enhancement of open spaces and improve opportunities for biodiversity. The Environment Act 2021 will also help contribute towards the achievement of this objective by making biodiversity net gain mandatory in most development from 2024. Taken together, these should limit the potential adverse impacts of development provided for by the Plan. The City's aspiration to enable public access to privately owned spaces is supported by the London Plan aim to build strong and inclusive communities.
- 5.7.19. **Transport and movement** – The radical changes in the 'Transport' and 'Health, Inclusion and Safety' policies within the City Plan 2040 have the potential to

⁷ Prime Minister Rishi Sunak confirmed in a speech on 20th September 2023 that the planned ban on the sale of petrol and diesel cars would be pushed back five years from 2030 to 2035.

create a positive impact against this objective but there remain uncertainties regarding the patterns of pedestrian movement and the impact of freight and servicing. Changes in retail patterns and the night-time economy could also affect the efficiency and sustainability of transport. However, redevelopment in some of the Key Areas of Change offer the opportunity to revisit and improve servicing arrangements. Many of the policies also support greater pedestrian permeability and prioritise walking and wheeling, while facilitating the servicing of the Square Mile in suitable ways, for example through consolidation. The policies also seek to ensure development reinforces the Healthy Streets Approach, with subsequent beneficial effects on transport and movement.

5.7.20. Wider transport and spatial development plans for London will impact on the City's small geographic area. Neighbouring borough's plans for intensification are mitigated by plans to increase public transport capacity, promote active travel modes and improve air quality associated with vehicle emissions. Strategic transport policies for London and the City's Transport Strategy provide the framework for the City's SA objective of improving the safety, sustainability, efficiency and attractiveness of transport and minimising the negative environmental and health impacts of travel in, to, from and through the City. Transport for London has adopted the Healthy Streets Approach, which was the framework used when the Mayor's Transport Strategy was being created. The Healthy Streets Approach will help deliver a healthier, more inclusive City where people choose to walk, cycle and use public transport.

5.7.21. **Housing** – The City's role as a business district means that the City Plan 2040 policies do not focus on housing to the same extent as other authorities' plans might. However, the City's small size and proximity to other areas enables housing to be provided elsewhere (as well as within the City), with the City contributing towards this through S106 contributions for affordable housing. Policy S3: Housing in the City Plan makes provision for a minimum of 1,706 net additional dwellings between 2025/26 and 2039/40 and seeks to achieve a minimum of 35% affordable housing⁸. Housing will be built to high standards of design and construction. Policy HS4: Housing quality standards requires that new housing developments meet appropriate outdoor space standards and amenity space for individual units, something that has been recognised as particularly important in the wake of the COVID-19 pandemic.

5.7.22. The City relies heavily on other areas of London and beyond to provide housing for its 591,000 workers. The City's contribution in providing jobs outweighs the need to provide significantly more housing within the City. London Plan housing policies and effective transport policies are key to the functioning of the City. The housing requirement to 2029 for all London Boroughs including the City (1,460) is set by the London Plan. The City's commitment to meeting its London Plan housing target up to 2029 and to meet the housing requirement identified by the standard method up to 2040 will contribute to the SA objective of delivering an environment that meets the needs and expectations of residents. The amended Building Regulations 2010 alongside other policies, particularly those in the 'Housing' section of the City Plan, will ensure housing is built to high standards of design and construction.

5.7.23. **Social and cultural facilities** – Assessment shows mainly positive impacts from the City Plan 2040 on social and cultural facilities with provision of shared

⁸ Residential developments with the potential for 10 or more units must achieve a minimum of 35% affordable housing. This percentage increases to 50% for developments on public sector land.

services and facilities benefiting neighbouring areas as well as the City. The policies in the 'Culture and Visitors' section of the Plan score particularly strongly against this objective, as they seek to increase the City's cultural offer in line with the Destination City initiative, aiming to create a more vibrant Square Mile that is a welcoming destination for everyone. Strategic Policy S6: Culture and visitors seeks the development of a wide range of cultural, leisure and recreational facilities across the City, whilst Policy CV2: Provision of arts, culture and leisure facilities requires the provision of arts, culture or leisure facilities in major developments, commensurate with their size.

- 5.7.24. The City's aspiration to develop a world-class cultural destination centred around the Barbican Centre and Smithfield is recognised in the London Plan and the Mayor's CAZ SPG and supported by the Mayor's Culture and Night-time Economy SPG. This aspiration coupled with the protection of existing facilities will help to provide suitable social and cultural facilities for all the City's communities.
- 5.7.25. **Health** – The City Plan 2040 as a whole takes a positive, proactive approach to health, which is reflected in the assessment. It includes objectives and various policies that will combine to improve the health and wellbeing of residents, workers and visitors, both directly and indirectly. In particular, the policies in the 'Health, Inclusion, and Safety' section of the Plan require development to contribute to healthy and active lifestyles, for example by providing access to sustainable transport links, green and blue infrastructure and open space and play facilities. Policy HL10 requires certain development proposals to be subject to a Health Impact Assessment. The policies promote improved air quality, the creation and protection of quieter spaces in the City, and the protection of health facilities and promotion of new ones, in suitable locations. They also seek to tackle noise pollution, manage construction and provide public toilets in appropriate locations. Other City Plan policies will address health and wellbeing indirectly, in particular those that seek to increase levels of walking and cycling including through the Healthy Streets Approach – as well as increasing levels of physical activity, this will reduce car use and the associated pollutants that can be damaging to human health.
- 5.7.26. The City of London Joint Health and Wellbeing Strategy's aim of creating a healthy urban environment aligns with the City Plan 2040 which places a greater emphasis on healthy streets, healthy lifestyles and healthy places. The London Health Inequalities Strategy reinforces this need for healthy places, all of which will help to achieve the SA objective of improving the health of the City's resident, worker and student populations.
- 5.7.27. **Education** – The assessment of the City Plan 2040 has not identified any negative impacts on education. A small number of the policies are expected to have positive effects against this objective, as they promote access to education, training and skills through the retention and development of educational facilities. One policy (TP1: The Temples) has particularly positive effects against this objective, as it further supports the Inner and Middle Temples as centres for education, training, and facilities for barristers and students. The Plan also supports provision of student accommodation for central London Universities.
- 5.7.28. The City's policy of joint provision of educational facilities relies on neighbouring boroughs' Local Plans for allocation of suitable sites and in turn supports the development of facilities such as academies in neighbouring boroughs.

6. Impact of the SA

- 6.1.1. Each emerging policy was assessed by the relevant policy officer and at least one other planner, then discussed with the other policy team members providing a collaborative approach. Policy development was therefore informed by this iterative process and changes were made in the course of drafting each policy.
- 6.1.2. Policy officers have developed their expertise in Sustainability Appraisal over the last decade. This has improved policy drafting skills so that unacceptable impacts are recognised at an early policy drafting stage and are less likely to be included in the Plan.
- 6.1.3. Specific changes which can be attributed to the SA process to date include:
- The City Plan 2040 objectives were refined to encompass the need to minimise the environmental impacts of the City's activities and to include heritage protection.
 - Alternatives which the SA demonstrated to have negative impacts such as the high office growth scenario, development of local waste management facilities and allowing development on some open space were rejected in the evolution of policy.
 - The decision to widen the Fleet Street KAOC policy to include Ludgate Hill was influenced by the SA assessment findings, which suggested that the original policy would have uncertain impacts on heritage assets including views of St Paul's Cathedral.
- 6.1.4. Where uncertainties were identified through the SA, mitigation measures have been identified where possible and incorporated into the Revised Proposed Submission version where feasible.

7. Mitigation

- 7.1.1. Where negative, uncertain or mixed effects were identified through the SA of the City Plan 2040, mitigation measures were proposed. The assessment tables in Appendix 5 set out in detail the mitigation measures identified for each set of policies and whether these were taken forward in the Revised Proposed Submission Plan.
- 7.1.2. The SA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the SA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan or in the London Plan. Mitigation measures have been incorporated into policies alongside any changes made in response to consultation comments.
- 7.1.3. A few negative effects were identified but none of these were significantly negative. The negative impacts of office development originally related primarily to waste management and housing, but policy changes have led to these being reassessed as mixed minor negative and positive. Policy OF2 now allows office floorspace in or near identified residential areas to be lost where this would create additional housing, while Strategic Policy S4 now includes reference to the transformation of space to support new uses. Ensuring that new floorspace is designed to enable transformation of space will reduce the need for redevelopment and associated construction waste. Minor negative impacts on waste remain for the Key Areas of Change policies that promote significant office development. The City's London Plan waste apportionment is relatively low recognising the difficulty of providing waste management capacity within the City's confined geographic area. The City Corporation will work in

partnership with other Waste Planning Authorities to help mitigate the negative impact of development on waste.

7.1.4. The restrictions on tall buildings which protect views of historic landmarks were identified as having minor negative impacts on economic growth. While minor negative effects are likely to be unavoidable, significant negative effects will be avoided by exploiting development potential where it is available in parts of the City where views protection does not apply. The City Plan 2040 identifies renewal opportunity sites in the City Cluster, where tall buildings will be appropriate subject to certain criteria.

8. Monitoring framework (proposed)

8.1.1. Table 11 shows the proposed framework of indicators which aims to monitor the significant sustainability effects of implementing the City Plan 2040. This monitoring will also ensure that where uncertainties exist any unintended adverse effects are picked up quickly, allowing any appropriate remedial action to be implemented. The monitoring framework will be finalised on adoption of the City Plan 2040.

Table 11: Proposed SA monitoring framework

Parameter	Effect of City Plan 2040 (significant effects are marked in bold text)	SA objectives	Monitoring indicators	Source of info
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna. Significant positive impacts on local biodiversity should result from implementation of the Open Spaces and Green Infrastructure policies.	8 Improved open spaces 9 Improved biodiversity and urban greening	Hectares of open space, green roofs and walls Number of bird species Numbers of marine mammals, fish, invertebrates and marine algae in the Thames at Blackfriars	Local Plan monitoring reports Rooftop birds survey Thames Tideway tunnel monitoring
Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health. Significant positive impacts on health and	3 Safe environment and crime reduction 11 Housing 13 Improved health 14 Improved education	Crimes committed. Data on trends in population, age structure, ethnicity, household structure. residential units permissions and completions, affordable housing, special needs housing Data on health facilities permissions and completions	City of London crime statistics Local Plan monitoring reports and development schedules Public Health Survey Air quality monitoring by Environmental Health Census Education statistics

	environmental protection will result from the Healthy and Inclusive City policies.		<p>Data on perception of health</p> <p>Pollution data</p> <p>Data on educational facilities permissions and completions</p> <p>Data on workforce population</p> <p>Data on educational qualifications</p> <p>Data on age and gender of workforce</p> <p>Data on deprivation</p> <p>Number of persons per socio-economic grouping of workforce</p>	<p>Equalities reports</p> <p>Census</p> <p>Indices of Deprivation</p> <p>City of London employment trends monitoring</p> <p>ONS Business Register and Employment Survey (BRES)</p>
Soil, Water and Air	<p>Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement. Policies for the Thames Policy Area, Air quality, and Contaminated land and water quality policies will have significant positive impacts on soil, water and air.</p>	<p>6 Improved environmental protection</p>	<p>Air quality – including in areas where consolidation centres serving the City are located</p> <p>River Thames water quality</p> <p>Contaminated land in the City</p>	<p>Air Quality Strategy annual monitoring report</p> <p>London-wide air quality data from the GLA</p> <p>Environment Agency monitoring</p> <p>City of London environmental protection monitoring</p>
Climatic factors	<p>Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City’s carbon emissions. Flood risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate. No significant climate impacts were identified from the implementation of the Plan due to the small geographic area covered.</p>	<p>7 Climate change mitigation and resilience</p> <p>10 Transport and movement</p>	<p>BEIS sub national annual carbon emission statistics for the City of London</p> <p>Average Urban Greening Factor associated with major developments</p> <p>SuDS in development and public realm</p>	<p>BEIS national statistics</p> <p>Urban Greening factor monitoring</p> <p>SuDS monitoring</p>

Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2040 policies including Safe and secure City, Culture and visitors and Open spaces and green infrastructure policies. The City's Key Areas of Change policies reinforce this generating significant local positive impacts.	1 Economic growth 2 Attractive built environment and public realm	Office and commercial floorspace permissions and completions Number of VAT registered businesses Spatial distribution of employment Scores of Global Financial Centres Hotel bedrooms Wi-Fi coverage Public realm enhancement schemes	Local Plan monitoring reports and development schedules ONS - Business Register and Employment Survey (BRES) Global Financial Centres Index COL infrastructure monitoring Public realm enhancement strategies
Cultural heritage and landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from identified viewing points. Significant positive impacts on cultural heritage will result from Smithfield and Barbican area policies	2 Attractive built environment and public realm 4 Heritage Assets 12 Social and cultural facilities	Number and type of designated heritage assets Number and type of designated heritage assets that are identified as being at risk Data on social and cultural facilities permissions and completions. Development in conservation areas	The Land Use of Listed Buildings in the City of London report City of London Churchyards Statement of Significance report Historic England's Heritage at Risk Register Local Plan monitoring report and development schedules
Waste	Implementation of the waste and circular economy policies will result in minimisation of waste arisings from the City. This will have significant positive environmental impacts on the movement and disposal of waste.	5 Improved waste management	Dataset of locations that waste is sent to, including type of waste and tonnage. Management of the City of London's waste apportionment	Waste Interrogator - data.gov.uk South-East London Joint Waste Planning Group membership. Technical report produced by South-East London Joint Waste Planning Group.

9. Next steps

This SA report will be issued for public consultation alongside the Revised Proposed Submission City Plan 2040 in April 2024 and will accompany the City Plan 2040 at submission. Any significant changes suggested at Examination will be assessed for their

impacts and any necessary mitigation proposed prior to adoption of the City Plan 2040. The draft monitoring framework will be finalised on adoption and confirmed in the Adoption Statement.

Appendices

Appendix 1 Other Plans and Programmes

Appendix 2 Baseline Information

Appendix 3 SA Consultation Responses

Appendix 4 SA of Reasonable Alternatives

Appendix 5 SA Assessments of the Revised Proposed Submission version of City Plan 2040)