

City of London

# **Appendix 3**

## **IIA Consultation Responses**

Local Plan Review

Environmental Report

City Plan 2036 Proposed Submission Draft

March 2021



Appendix 3: Local Plan Integrated Impact Assessment draft Scoping Report consultation responses 11<sup>th</sup> January – 29<sup>th</sup> Feb 2016

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

Date	Name	Organisation	Comment	City of London Response ( <b>bold</b> text indicates change <del>strike through</del> denotes deletion and <u>underlining</u> denotes additional text)
			<p>undertaken for a higher level plan. In addition it is also useful to incorporate within the main body of the report a summary of the review and its main implications. It is noted that at present there is just a list of documents. In addition to this identified we would suggest that Historic England's good practice advice notes are included.</p> <p>(Web link: <a href="https://historicengland.org.uk/advice/planning/planning-system/">https://historicengland.org.uk/advice/planning/planning-system/</a>)</p>	

Further advice 29/06/16	Graham Saunders  Principal Advisor - London	Historic England	Suggest adding the following other plans and programmes: Regional - include the <ul style="list-style-type: none"> <li>• Mayor's Character and context SPG, and</li> <li>• CAZ SPG</li> </ul> National – suggest inclusion of the <ul style="list-style-type: none"> <li>• Good Practice Advice Notes HE has prepared on Local Plan Making (GPA1),</li> <li>• Managing Significance in Decision-Taking in the Historic Environment (GPA2) and</li> <li>• Setting &amp; Views (GPA3).</li> </ul>	Additional suggested SPGs and advice notes have been considered in the assessment of other plans and programmes and added to Appendix 1: Regional - include the <ul style="list-style-type: none"> <li>• Mayor's Character and context SPG, and</li> <li>• CAZ SPG</li> </ul> National – suggest inclusion of the <ul style="list-style-type: none"> <li>• Good Practice Advice Notes HE has prepared on Local Plan Making (GPA1),</li> <li>• Managing Significance in Decision-Taking in the Historic Environment (GPA2) and</li> <li>• Setting &amp; Views (GPA3).</li> </ul>
25/02/16	Graham Saunders Principal Advisor - London	Historic England	<b>Baseline Information</b> – We recommend that the baseline information is tailored to the scale, type and topic of the development plan and is proportionate to the area. It is important to ensure that the information is both quantitative and qualitative, is up to date and describes the current and future likely state of the historic environment. This provides the basis for: <ul style="list-style-type: none"> <li>• Identifying sustainability issues;</li> <li>• predicting and monitoring effects; and</li> <li>• identifying alternative solutions</li> </ul> The baseline information at the moment is relatively limited in its value, in that it focusses on the number of designated heritage assets, their type, and through a map its geographical spread. Although the number of heritage assets at risk are mentioned there is no further qualitative or conditional information provided concerning the wider historic environment and all heritage assets.	The following paragraphs have been added to the baseline information: <b><u>8.2 The City Corporation has published a Historic Environment Strategy and a series of Conservation Area Character Summary and Management Strategies as Supplementary Planning Documents (SPDs). In addition, the City Corporation has published an Archaeology and Development Guidance SPD. The documents are published on the City Corporation's web site.</u></b>  <b><u>8.3 Historic England's "Heritage at Risk – London and the South East Register" (2019) lists two buildings and three sections of the London Wall as being at risk:</u></b>  <b><u>8.5 There are numerous non designated heritage assets in the City which merit consideration in planning decisions.</u></b>
25/02/16	Graham Saunders Principal Advisor - London	Historic England	<b>Baseline information</b> - We would also advise that a wider geographic area is considered, in order to assess the likely significant environmental effects on the historic environment and heritage assets (e.g. Tower of London WHS) resulting from the Local plan that may have cross boundary implications (e.g. tall buildings, transport improvements and infrastructure).	Add the following paragraph to the baseline information: <b><u>8.4 Development in the City may have an impact on heritage assets beyond the City's boundaries in the neighbouring boroughs of Tower Hamlets, Islington, Camden, Westminster, Southwark and Lambeth and beyond. Details of these assets can be found on the Historic England web site or through individual borough's web sites. The Tower of London World Heritage site is of particular importance in this context.</u></b>

25/02/16	Graham Saunders Principal Advisor - London	Historic England	<b>Sustainability Issues and Problems</b> – Analysis of a comprehensive range of sources of baseline information for the historic environment is essential in order to help identify sustainability issues related to the historic environment. It is important to demonstrate an understanding of the contribution of the historic environment to sustainable development and its role in delivering wider social, cultural economic and environmental benefits. For example, heritage led regeneration can provide opportunities for sustainable tourism, leisure and recreation activities, and help strengthen the character of a place. From the details provided we would suggest that the issues for the City of London are not just limited to its heritage assets, but the wider historic environment and other heritage assets beyond the boundaries of the City.	Add the following paragraph to the Sustainability Issues and problems section of the main report recognising the need to consider the key issue of pedestrian movement on heritage assets and landscapes: <b><u>4.3.12 The heritage assets within the City form part of a wider network of listed buildings and conservation areas, which illustrate London’s rich history, extending into neighbouring boroughs and beyond. The Local Plan must respond to the future plans for cultural and heritage assets within and outside the City for example considering the impact of increased visitor numbers and access routes through the City. Development within the City must not detract from the historic significance and setting of assets elsewhere. Of particular importance in this context is the Tower of London World Heritage Site which lies just beyond the City’s boundary to the east.</u></b>
25/02/16	Graham Saunders Principal Advisor - London	Historic England	<b>IIA Framework</b> – First the objective and supporting criteria for “Heritage Assets” should take account of the concepts of significance and settings, as set out by Government’s national policy (NPPF). In addition it is important to ensure that the relationship between the topic areas is assessed sufficiently e.g. between heritage assets, open space and economic growth. In addition it is essential to ensure all forms of impacts are considered including direct, indirect and cumulative.	Change wording of objective 4 to read To conserve or enhance <b>the significance of</b> heritage assets and their settings <del>and enabling</del> public appreciation and access wherever possible.  And expand the criteria to specify the significance of heritage assets noting that their settings are already addressed within this criterion: Will the policy conserve or enhance <b>the significance of</b> 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?  Section 5.9 of the main report considers the cumulative impact of the City Plan 2036 and other plans on the IIA objectives.
29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	<b>Section 4. Stage A1 Other Plans and programmes</b> The following plans and programmes should also be considered: <i>Environment Agency strategies, plans and evidence:</i> <ul style="list-style-type: none"> <li>• Thames River Basin Management Plan</li> <li>• London borough factsheets 2013 (State of the Environment Reports)</li> <li>• Groundwater protection: principles and practice 2012 (GP3)</li> <li>• (Baseline data)- datasets available from DEFRA agencies including Environment Agency, natural England, Forestry Commission and Canals and Rivers Trust</li> </ul>	The following plans have been added to the list of other plans and programmes and to the other plans and programmes spread-sheet: <b>Thames River Basin Management Plan 2015</b> <b>Groundwater protection: principles and practice (updated Feb 2018)</b>

29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	<p>Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 5 Waste management.</p> <p>We support the inclusion of an objective on waste management; however, we would like to see the following additions to the criteria:</p> <ul style="list-style-type: none"> <li>- <b><u>Will the policy encourage the transport of materials by rail or river where possible?</u></b></li> <li>- <b><u>Will the policy safeguard existing wharves, particularly Walbrook Wharf, which at the moment has some spare capacity due to falling residual waste tonnages?</u></b></li> <li>- <b><u>Will the policy reduce the overall waste arising per capita?</u></b></li> </ul>	<p>Add the following criteria to objective 5 Waste management:</p> <p><b><u>Will the policy encourage the transport of materials by rail or river where possible?</u></b></p> <p><b><u>Will the policy safeguard existing wharves, particularly Walbrook Wharf?</u></b></p> <p><b><u>Will the policy reduce the overall waste arising per capita?</u></b></p>
29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	<p>Within this objective or at a later stage in the plan, we would also like to see the following addressed –</p> <ul style="list-style-type: none"> <li>- A requirement for developments to have a site waste management plan looking at all of the construction outputs and also addressing the post construction collection of waste materials.</li> <li>- Some kind of policy or action plan for construction, demolition and excavated materials (CDE) wastes is essential as looking at data for the City of London (CoL), the tonnage has gone up dramatically recently and likely future trends for development mean that it could remain high for some considerable time</li> <li>- It would be good to mention hazardous waste as there are no facilities in the City of London.</li> </ul>	<p>Objective 5 Waste Management includes criteria to assess whether policies will reduce construction and deconstruction waste. An additional criterion has been added as follows:</p> <p><b><u>Will the policy reduce hazardous waste arisings from the City?</u></b></p>

29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 6 – Environmental Protection We support the inclusion of an objective in Environmental Protection. However it needs to address the issue of urban diffuse pollution which has been identified through the Water Framework Directive (WFD) and the Thames River Basin Management Plan (RBMP) as being a particular issue in the CoL. There is a duty on all Public Bodies (including Local Authorities) to have regard to the WFD and the recommendations from the Thames RBMP and the addition of the suggested criteria below would go some way to achieve the recommendations of the RBMP. We recommend that the following is included as a criteria: - <b><u>Will the policy improve water quality by reducing diffuse urban pollution?</u></b>	Add the following criterion to Objective 6 Environmental Protection: <b><u>Will the policy improve water quality by reducing diffuse urban pollution?</u></b>
29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	Section 10. Stage A4 Integrated Impact Assessment Framework, Table 1 Objectives and Criteria, Objective 7 – Climate change mitigation and resilience We support the inclusion of an objective on Climate change mitigation and resilience and its specific link to the Thames Estuary 2100 Plan. To make the criteria more specific, we would like to see it amended to read - <i>Will the policy assist in reducing vulnerability <b><u>to flood risk within and beyond the City (e.g. by supporting the TE2100 plan)</u></b></i>	Amend criterion for Objective 7 to read: <i>Objective 7 - Climate change mitigation and resilience.....</i> <i>Will the policy assist in reducing vulnerability <b><u>to flood risk within and beyond the City (e.g. by supporting the TE2100 plan)</u></b></i>
29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	The CoL has areas of tidal flood risk from the River Thames to the south and areas of surface water flood risk. We would therefore expect the Integrated Assessment to include the reduction of flood risk as a key sustainability issue	Amend paragraph 4.3.9 to refer to flood risk Soil and water quality, water resources and <del>flood</del> <b><u>ing risk</u></b> ..... <b><u>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 as the climate changes.</u></b>
29/02/16	Deborah Simons  Planning Specialist Sustainable Places	Environment Agency	The CoL is different to most local authorities in that you traditionally struggle to attract much Grant in Aid funding for flood defence schemes due to low partnership funding scores owing to having relatively few residential properties at risk. Therefore using developers to part fund projects is the preferred route. You would benefit from identifying areas that are most at risk or flood most frequently and work up some schemes so that if/ when development is proposed in the same area, which would also benefit from defences, you are more prepared with their partnership project to approach developers.	The adopted Local Plan Policies map identifies the City Flood Risk Area where development proposals must address the risk of flooding. Policy 18.1 (3) includes a requirement to provide protection from flooding beyond the site boundaries, where feasible and viable. Implementation of the City of London Local flood risk management Strategy includes an action to prepare flood risk management plans for Farringdon Street, Paul's Walk and Victoria Embankment which are the main areas at risk of flooding in the City. <b>No change needed</b>

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



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

## City Plan 2036 Issues & Options - Integrated Impact Assessment consultation report

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

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

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

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

Date	Name	Organisation	Comment	City of London Response ( <b>bold</b> text indicates change <del>strike through</del> denotes deletion and <u>underlining</u> denotes additional text)
			Register (2016) (e.g. 1 listed building, 3 Places of Worship and 3 Schedule Monuments). <ul style="list-style-type: none"> <li>• Compatibility Matrix – where the commentary on the relationship between heritage and economic growth objectives is ambiguous, yet on the matrix it is marked as a ‘x’, which suggests conflict. Greater clarity is needed.</li> </ul>	

**Conclusion:** Comments were received from 2 statutory consultees (Environment Agency and Historic England) acknowledging the changes that have been made in response to our previous IIA Scoping Report consultation. Further improvements to the baseline and compatibility matrix were proposed. These were incorporated into the IIA framework and reported in the IIA Report which accompanied the draft City Plan 2036.

## **Draft City Plan 2036 IIA consultation report**

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

- [Integrated Impact Assessment](#)
- [Appendix 1 - Other plans and programmes](#)
- [Appendix 2 - Baseline information](#)
- [Appendix 3 - Consultation responses](#)
- [Appendix 4 - Commentary](#)
- [Appendix 5 - IIA assessments](#)
- [Appendix 6 - Policy stories](#)
- [Appendix 7 - Audit statement](#)

No comments on the Integrated Impact Assessment were received.