

City of London

**Appendix 4**  
**IIA Commentary**

Local Plan Review

Environmental Report

City Plan 2036 Proposed Submission Draft

March 2021



## **Integrated Impact Assessment Commentary**

### **Introduction**

Integrated Impact Assessment (IIA) provides a systematic means of assessing the likely impact of alternative options for policy in the emerging Local Plan. IIA encompasses Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) screening.

The SEA Directive requires the assessment of alternatives to the proposed plan:

‘..an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated’ (2001/42/EC) (Article 5.1).

### **Assessment framework**

This assessment evaluated the broad alternative approaches that were presented to the Planning and Transportation Committee on 26/07/16. These alternatives were included in the Issues and Options document for public consultation, however only selected strategic alternatives were assessed. For full details of the assessment framework, objectives and criteria see the Integrated Impact Assessment Scoping Report.

### **Outcomes**

The outcomes of this assessment were used alongside Member’s views, other evidence, and issues and options consultation responses to inform the development of the draft Local Plan.

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Assessment Key

↑	Significant positive impact
↑	Positive impact
↕	Uncertain impact
↑↓	Both positive and negative impacts
↓	Negative impact
↓	Significant negative impact
-	No impact

↑	One arrow = Local impact within the City
↑↑	Two arrows = Regional impact
↑↑↑	Three arrows = National or international impact

## Office protection

### Ref I&O Question 3.1:

Should we protect an identified “Commercial Core” where only offices and complementary commercial uses will be permitted? Outside the core, should we be more flexible allowing a mix of land uses, including housing and hotels? What areas of the City should be outside of any identified core?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Office protection	Alternative 1 Protect an identified commercial core only	↕	⬇	↕	↑	↑	⬇	⬇	⬇	⬇	⬇	↑	↑	⬇	↑	
Office protection	Alternative 2 Continue to protect commercial floorspace throughout the City	↑↑↑	↑	↕	⬇	-	-	-	⬇	⬇	⬇	⬇	⬇	⬇	↑↑	↑↑

### Office protection Alternative 1: Protect an identified commercial core only

Commentary: This option assumes that the commercial core covers most of the City but releases areas such as the cultural hub area in the north of the City for other uses. This option would protect commercial floorspace from redevelopment for other uses but could lead to insufficient floorspace to meet demand and pressure on the public realm within the protected commercial core. The impact would depend on where the boundary is drawn between the protected core and other parts of the City. Security measures

will be easier to implement in a smaller commercial area but intensification could lead to more opportunities for petty crime. Historic buildings elsewhere in the City should continue to be protected but could be released for other beneficial uses. Intensification may lead to issues of light pollution and overshadowing. Concentration of buildings will provide opportunities for more efficient waste management and decentralised energy networks but could exacerbate the urban heat island effect. The impact on open spaces biodiversity and transport would depend on the scale of intensification and the boundary of the protected commercial core. This option would release commercial buildings for housing, social and cultural facilities, health and education uses elsewhere in the City.

Timescale: Medium to long term

Geographic scale: Mainly local but with national and international implications

Temporary or permanent: Temporary – designations could change in future

### **Office protection Alternative 2: Continue to protect commercial floorspace throughout the City**

Commentary: This option will protect the City's commercial character as a global financial centre. Providing a larger commercial area will spread the pressures on the public realm. This option could present challenges for security although no greater than at present. Historic buildings will continue to be protected but with less flexibility as to their future use. This option will assist in spreading commercial pressures over a wider area enabling the existing open spaces to be maintained without overuse and spreading the servicing and freight, pedestrian movement and cycle and vehicle parking over a wider area. Continuing to protect commercial floorspace throughout the City will limit other uses restricting the City's aspiration for a greater cultural role. Continuing to protect commercial floorspace throughout the City should encourage training and job opportunities within and beyond the City boundaries.

Timescale: Short medium and long term

Geographic scale: mainly local but with national and international implications

Temporary or permanent: Temporary – designations could change in future

## Balance of land uses

**I&O Question 3.4:** How should the Local Plan encourage new and emerging employment sectors? Should we aim to maintain the City's distinctive employment base, with a concentration of financial and business services, or diversify more?

**I&O Question 3.6:** Are large floor-plate offices still required in the City? Should more flexible floor-plates and building designs be encouraged to support new ways of working?

**I&O Question 5.3:** Should we set a target for the number of new hotel bedrooms or hotels in the Local Plan? If so, what do you think that target should be?

**I&O Question 7.8:** Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?

Issue	Alternatives	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	Equality and inclusion
Balance of land uses	Alternative 1 Maintain City's B1 office employment focus	↑↑↑	↑	-	↑↓	-	-	↑↓	-	-	↑↓	↓↓	↓↓	-	↑↑	↑↑
Balance of land uses	Alternative 2 Diversify to allow more mixed use, serviced offices and affordable workspace	↑↑↑	↑↑	-	↓	-	-	↓↑	-	-	↑	↓	↑	-	↑↑	↑↑
Balance of land uses	Alternative 3 Diversify to allow more hotels	↑↓	↓	↑↓	↓	-	-	↑	-	-	↑↓	↓	↑	-	-	↑↑
Balance of land uses	Alternative 4 Diversify to allow more housing	↓	↓	-	↓	-	-	↑	-	-	↑↓	↑↑	↑↓	↑↓	↑↓	↓

### Balance of land uses Alternative 1: Maintain City's B1 office employment focus

This option ensures that the City continues to provide employment opportunities for a wide range of individuals locally and regionally and provides premises for national and global commerce. Focussing on offices gives a distinctive character to the City

which is reflected in the public realm. Diversification could compromise this character. Office focus could put pressure on historic buildings but preservation of historic buildings creates more attractive office environment. The concentration of office development in the City's hub makes the most effective use of the transport network enabling people to travel to work by public transport (CO2 emission reduction), avoiding radial transport which is more likely to be car based. However increases concentration of offices adds to servicing and delivery impacts. Concentration of offices adds to heat island effect. The potential for development of housing and social and cultural facilities is limited by this option which continues to rely on provision of these facilities in other parts of London and beyond. Provision of childcare facilities associated with offices and potential for professional services training is enhanced by the concentration of offices. Maintaining the employment base in the City provides a range of jobs which are accessible to communities in and around the City.

Timescale: Medium - long term. Adopting this option would drive the direction of the City's development for the period of the local plan with a legacy of office buildings lasting into the future

Geographic scale: This option has impacts nationally and internationally since the City is a global financial centre

Temporary or permanent: Temporary - office buildings can be designed to be adaptable for other uses in the future

### **Balance of land uses Alternative 2: Diversify to allow more mixed use, serviced offices and affordable workspaces**

More mixed use and serviced offices could absorb some of the businesses displaced by permitted development of office to residential elsewhere in London, making use of a range of workspaces. This option could provide beneficial uses for some heritage buildings but their significance would need to be protected. A greater mix of uses provides opportunities for living and working close together and enables use of decentralised energy networks supplying a mix of uses. The provision of retail within the mix of uses, to serve the needs of the City's workers, residents and visitors would be beneficial in reducing the need for people to travel elsewhere to shop. This option will reduce the space available for housing. Concentration of a range of workers provides opportunities for provision of professional training services.

Timescale: Short – medium term

Geographic scale: Local impacts on other uses

Temporary or permanent: Temporary – mixed use could be converted to other uses in the future.

### **Balance of land uses Alternative 3: Diversify to allow more hotels**

The transitory and global nature of the City's workforce requires provision of hotels to complement the City's businesses. Hotels associated with tourist attractions generate vibrancy particularly at weekends when the City's offices are closed with benefits for passive surveillance but increases likelihood of petty crime and anti-social behaviour. This option could provide beneficial uses for some heritage buildings but their significance would need to be protected. The provision of hotels close to business and tourist attractions would reduce pressure on the transport network enabling people to walk to their destinations with benefits for CO2 reduction and a mix of loads for CHP networks. However the loss of offices to hotel uses could be detrimental, reducing the City's office stock.

Timescale: Short – medium term

Geographic scale: Local impacts on other uses

Temporary or permanent: Temporary – hotels could be converted to other uses in future.

#### **Balance of land uses Alternative 4: Diversify to allow more housing**

Whilst contributing to London's housing need, the encouragement of more housing in the City could displace employment space impacting on economic prospects over a much wider area. The City's strategic importance for employment could be compromised if housing development takes precedence over office protection. This option could provide beneficial uses for some heritage buildings but their significance would need to be protected. Allowing more housing in close proximity to workplaces reduces the need to travel with benefits for CO2 emissions and provides opportunities for CHP networks by providing a mix of loads, Housing could displace cultural facilities and put additional pressure on social health and education facilities but provides sufficient people for provision of efficient services.

Timescale: Medium – long term

Geographic scale: Local & regional

Temporary or permanent: Permanent – the nature of housing development in the City (mainly flats) means that it is very difficult to reverse housing development in favour of other uses.

## Utilities and digital infrastructure

**I&O Question 3.7:** How can we ensure that the necessary infrastructure is planned for and installed in a timely and cost effective manner? Could the City Corporation instigate more strategic and collaborative approach to implementation and funding of utility infrastructure?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Utilities and digital infrastructure	Alternative 1 Prioritise new utilities infrastructure according to strategic demand instigating a more collaborative approach to implementation and funding	↑↑↑	↑	↑	↑	↑	↑	↑	↑↓	-	↑	-	-	-	-	↑
Utilities and digital infrastructure	Alternative 2 Promote infrastructure improvements associated with each site in line with current planning policy	↑↑↑	↓	-	↓	↓	↓	↓	↑↓	-	↓	-	-	-	-	-

### Utilities and Digital Infrastructure Alternative 1: Prioritise new utilities infrastructure according to strategic demand, instigating a more collaborative approach to implementation and funding

Commentary: A strategic approach will enable utilities to be made available in a timely manner enabling businesses to have confidence that capacity will be available to meet demand. Greater co-ordination of street works reduces the potential for pollution

and disruption associated with utility works. A strategic approach will enable planning for low carbon infrastructure and resilience at a wider than site level. The impact of providing digital infrastructure in open spaces has uncertain impacts on the quality and tranquillity of open spaces but could encourage wider use of these spaces. Co-ordinated approach will enable better planning for street works. Digital inclusion agenda can be addressed through this option.

Timescale: medium to long term

Geographic scale: local and regional

Temporary or permanent: Temporary - strategy could be changed in future

**Utilities and Digital Infrastructure Alternative 2: Promote infrastructure improvements associated with each site in line with current planning policy**

Commentary: A site by site approach risks uncoordinated street works and potential for over or under provision of infrastructure. Site by site approach does not enable low carbon infrastructure to be planned and/or funded at a wider than site level. Without a strategic approach impacts on heritage assets, environmental protection and climate impacts are uncertain. There is a greater risk of repeated street works leading to more waste.

Timescale: short to medium term

Geographic scale: Local

Temporary or permanent: Temporary – alternative approach could be implemented in future

## Safety and security

**Ref I&O Questions 3.10:** What are the key issues concerning night time entertainment? Should we identify areas of the City either to promote or restrict night time entertainment uses? If so which areas would you suggest? Would clear dispersal routes help to minimise the impact of night- time venues?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Safety and security	Alternative 1 Continue to seek to strike a balance between promoting the night-time economy and protecting residential amenity	↑	↑	↓	-	↓	↓	-	-	-	↑	↕	↑	↕	-	-
Safety and security	Alternative 2 Identify areas of the City to promote night time uses	↑	↕	↕	-	↕	↕	-	↓	↓	↕	↓	↓	↕	-	-
Safety and security	Alternative 3 Identify areas of the City to restrict night time uses	↓	↓	↑	-	↑	↑	-	↓	↓	↑	↓	↓	↑	-	-

### Safety and Security Alternative 1: Continue to seek to strike a balance between promoting the night-time economy and protecting residential amenity

Commentary: Balanced approach allows night time economy to support the business City and attract workers whilst protecting residents. This approach can result in dispersed anti social behaviour that is difficult to police. Waste management likely to be on site by site basis rather than co ordinated for a specific area. Seeks to protect residential amenity but is not always successful and

does not necessarily address noise and light pollution associated with night time economy. Provides night time economy facilities for City workers within the City reducing the need to travel. Protects residential amenity.

Timescale: Short to medium term

Geographic scale: Local (with some impacts across the boundary in neighbouring boroughs)

Temporary or permanent: Temporary

### **Safety and Security Alternative 2: Identify areas of the City to promote night time uses**

Commentary: Positive promotion of night time uses provides attractive environment for workers and variety of local jobs. Could lead to concentration of anti social behaviour in these areas but would be easier to police. Opportunity for collective deliveries and waste management from night time premises. Promotion of night time uses could lead to more waste. Promotion leads to increased noise and light pollution but easier to manage in restricted area. Impact on open spaces and biodiversity depends on which areas are designated. Opportunity for workers to access night time economy without transport but promotion could attract people to travel into the City from elsewhere. Impact on residents and overall impact on culture and leisure depends on scale and position of designated areas. Positive impacts on social interaction & mental health but could encourage more alcohol and smoking related problems.

Timescale: Medium term

Geographic scale: Regional – could attract revellers from elsewhere in London

Temporary or permanent: Temporary

### **Safety and Security Alternative 3: Identify areas of the City to restrict night time uses**

Commentary: Uncertain – need to define the scale and position of areas for meaningful assessment. Restriction on nighttime uses could reduce anti social behaviour in these areas. Easier to police the rest of the City. Noise and light pollution easier to manage. Impact on open spaces and biodiversity depends on which areas are designated. Impact on residents and overall impact on culture and leisure depends on scale and position of designated areas. Positive impacts on social interaction and mental health. Restrictions will reduce the negative health impacts such as smoking and alcohol.

Timescale: Medium term

Geographic scale: Local

Temporary or permanent: Temporary

## Key City Places

### I&O Question 4.1

Should the concept of Key City Places be retained in the new Local Plan? Should we continue to focus only on areas where significant change is expected? Should they be renamed as Areas of Change?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Key City Places	Alternative 1 Retain existing Key City Places	↑	↑	-	-	-	-	-	↑	↑	↑	-	-	-	-	-
Key City Places	Alternative 2 Identify Key City Places to cover the whole City	↑	↑	-	-	-	-	-	↑	↑	↑	-	-	-	-	-
Key City Places	Alternative 3 Review and identify new Areas of change where change is expected during the Plan period	↑	↑	-	-	-	-	-	↑	↑	↑	-	-	-	-	-

### Key City Places Alternative 1: Retain existing Key City Places

Commentary: These areas will not be undergoing much change during the period of the revised Local Plan therefore the potential to influence economic growth or public realm is limited. The impact on open spaces would be largely positive as the existing policies have been in attracting funding for improvements to transport and open spaces

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

### **Key City Places Alternative 2: Identify Key City Places to cover the whole City**

Commentary: This option would not specifically focus on areas of change so impacts on economic growth and public realm may be diluted. The impact on open spaces would depend on whether specific policies are enacted to improve open spaces and biodiversity. A whole City approach provides opportunities for taking a strategic approach to transport and movement

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

### **Key City Places Alternative 3: Review and identify new Areas of Change where change is expected during the Plan period**

Commentary: This option focusses on the areas where there is the greatest potential to influence development and public realm. Assuming similar policies to the current Key City Place policies – this should lead to improvements in transport and open spaces. Focussing on the areas of change would enable a responsive approach to transport where it is likely to be most effective.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

## River transport

### I&O Question 4.14:

Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
River transport	Alternative 1 Continue to seek greater use of the River Thames for transport	↑	↑	-	↓	↑	↕	↑	↓	↓	↑↑	-	↓	↓	-	↓
River transport	Alternative 2 Actively promote /require the use of the Thames for future servicing of buildings	↕	↑	-	↓	↑	↕	↑	↓	↓	↑↑	-	↓	↓	-	↓

#### Alternative1: Continue to seek greater use of the Thames for transport

Commentary: Seeking rather than requiring greater use of Thames could reduce congestion without placing extra burdens on developments. Greater use of the river could affect archaeological deposits in the foreshore. Greater use of the river reduces road use but emissions from river vessels are not regulated and some river vessels produce high levels of polluting combustion emissions with potential detrimental health impacts. Use of river transport reduces carbon emissions associated with transport see

reference <sup>1</sup>. Impact on open spaces and biodiversity will depend on the level of use of the river which is the City's largest open space and a Site of Metropolitan Importance for Nature Conservation. Could encourage social activities on the river. Equality and inclusivity will be dependant on access arrangements for river craft.

Timescale: Short, medium and long term

Geographic scale: Regional

Temporary or permanent: Temporary

**Alternative2: Actively promote/ require the use of the Thames for future servicing of buildings**

Commentary: Greater use of the Thames will reduce traffic congestion thus improving public realm but could increase costs for servicing. Greater use of the river could affect archaeological deposits in the foreshore. Greater use of the river reduces road use but emissions from river vessels are not regulated and some river vessels produce high levels of polluting combustion emissions with potential detrimental impacts on health.. Impact on open spaces and biodiversity will depend on the level of use of the river which is the city's largest open space and a Site of Metropolitan Importance for Nature Conservation. Equality and inclusivity will be dependant on access arrangements for river craft.

Timescale: Medium to long term

Geographic scale: Regional

Temporary or permanent: Temporary

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<sup>1</sup> CO2 Emissions from Freight Transport: An Analysis of UK Data: Alan McKinnon: Logistics Research Centre, Heriot-Watt University, Edinburgh, UK EH10 7HR

## Development on or over the river

### I&O Question 4.15:

Should we continue to maintain the current openness of the river by refusing development on or over the river, reinforcing the flood defences and protecting the foreshore for biodiversity?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Development on or over the river	Alternative 1 Continue to maintain the openness of the river by refusing development on or over the river	↕	↕	⬇	↑	↑	↕	⬇	↑	↕↕	↕	-	↕	-	-	↑
Development on or over the river	Alternative 2 Allow selective development on or over the river subject to navigation and safety considerations	⬇	⬇	↕	↓	⬇	↕	⬇	↕	↕	↕	⬇	⬇	↑	↕	⬇

#### Alternative1: Continue to maintain the openness of the river by refusing development on or over the river

Commentary: Business premises along the river and the existing riverside walk are attractive due to their views which could be compromised if development over the river was allowed. Existing riverside walk has some isolated areas which encourage ASB rough sleeping etc. Refusing any development on or over the river could restrict future options for removing such areas e.g. London Bridge staircase. Protects heritage assets including archaeology in their riverside locations. Protects access to Walbrook

Wharf. Could prevent development of water quality infrastructure associated with sewer outflows but prevents contamination/ littering etc. associated with development. Future flood protection/ flood defence raising may need development on or over the river. Protects open space and biodiversity associated with the river in line with Riverside Strategy with benefits for river ecology. Protects existing transport infrastructure but could prevent the development of new piers and new walking routes along the river. Provides opportunities for social activities but limits this to existing spaces which are restricted in some areas. Is in line with accessibility objectives of the Riverside Strategy.

Timescale: Short, medium & long term

Geographic scale: Local but with some impacts for other parts of the river

Temporary or permanent: Potential effects on ecology could be permanent.

### **Alternative2: Allow selective development on or over the river subject to navigation and safety considerations**

Commentary: Potential loss of businesses if riverside development changes the character of the City's riverside through increased tourist numbers or loss of river views. Development over the river could impact on existing riverside walk and could increase risk of river accidents/ suicide. Existing riverside walk has some isolated areas which encourage ASB rough sleeping etc. Selective development on or over the river could substitute more open areas e.g. London Bridge staircase. This option could impact on the settings of riverside heritage assets and archaeological sites. Could impact on access to river wharf and piers. Allows development of water quality infrastructure associated with sewer outflows but development could cause other pollution of river/ litter etc. Future flood protection/ flood defence raising may need development on or over the river. Could provide additional open space but this could compromise existing riverside open space and biodiversity. Could enable transport infrastructure such as additional piers but boardwalk type development could impact on access to existing wharf and piers. Could impact on residential amenity for residential cluster at Queenhithe. Could encourage more riverside social activities, sport etc with benefits for health and opportunities for education about the river. However increased activity associated with river development could cause disturbance for City of London school for boys. Accessibility depends on type and design of development.

Timescale: Medium to long term

Geographic scale: Local but with potential transport and ecology impacts for other parts of the river

Temporary or permanent: Potential effects on ecology could be permanent

## Hotels and business accommodation

**I&O Question 5.2:** Are there certain areas of the City where hotel development is inappropriate, or where hotels should be encouraged? Should these areas be identified in detail or more generally?

**I&O Question 5.4:** Should accommodation for business visitors to the City be prioritised over accommodation for tourists? If so what role can the planning system play in ensuring this is delivered?

Issue	Alternatives	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	Equality and inclusion
Hotels and business accommodation	Alternative 1 Continue to apply a criteria based approach to new hotels	↑↓	↑	↑	↑	-	-	-	-	-	-	-	↑	-	-	-
Hotels and business accommodation	Alternative 2 Identify areas where hotels should be restricted	↑	↑	↑	↑	↑	↑	↑	-	-	↑	-	↑	↑	-	-
Hotels and business accommodation	Alternative 3 Identify areas where hotels should be encouraged	↑	↑	↑	↑	↑	↑↓	↑	-	-	↑	-	↑	↑	↑	↑
Hotels and business accommodation	Alternative 4 Prioritise types of accommodation which specifically satisfy business needs (e.g. serviced apartments)	↑	↑	-	-	-	↑	↑	↑	↑	↑	↑↑	↑	-	-	-

**Alternative1: Continue to apply a criteria based approach to new hotels**

Commentary: This option balances other criteria such as residential amenity and impact on public realm with the need for hotel accommodation but leads to loss of office floorspace. Criteria could include protection of historic assets. Provides social facilities associated with hotels.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Alternative2: Identify areas where hotels should be restricted**

Commentary: Provides opportunity to protect the commercial core from hotel development. Enables efficient provision of services for hotels, and policing associated with hotels, in more restricted areas where they are needed. Opportunity for beneficial uses of historic assets. Focusses hotel waste issues in particular areas – opportunity for collective waste management. More efficient servicing reduces air quality impacts. Provides social facilities associated with hotels. Potential to manage noise levels more effectively.

Timescale: Medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Alternative3: Identify areas where hotels should be encouraged**

Commentary: Impact on economy depends on where hotels are encouraged. Enables efficient provision of services for hotels, and policing associated with hotels, in more restricted areas where they are needed. Opportunity for beneficial uses of historic assets. Focusses hotel waste issues in particular areas – opportunity for collective waste management. More efficient servicing reduces air quality impacts. Encouragement for hotels increases water use. Provides social facilities associated with hotels. Potential to manage noise levels more effectively. Potential to locate hotels in east of City providing jobs and training for City fringe residents.

Timescale: Medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Alternative4: Prioritise types of accommodation which specifically satisfy business needs (e.g. serviced apartments)**

Commentary: This option would provide accommodation suitable for the needs of businesses. Enables provision of specific services for business accommodation. Could put additional pressure on open spaces with impacts for biodiversity. Reduces emissions from transport if business visitors can stay close to workplace. Provides suitable accommodation for workers reducing pressure on other types of housing. May not provide social facilities.

Timescale: Medium term

Geographic scale: Local with some regional impacts

Temporary or permanent: Temporary

## Historic environment

**I&O Question 5.6:** How can the Local Plan help new development conserve and enhance the significance of heritage assets? What should the Local Plan say about the setting of heritage assets? Should we include policies and guidance within the Local Plan on non-designated heritage assets?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban environment	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Historic environment	Alternative 1 Protect only designated heritage assets and their settings	↑	↑		↑↑	-	-	-	↑	↑	-	-	↑	-	↑	-
Historic environment	Alternative 2 Protect designated and non-designated heritage assets and their settings	↓	↓		↑↑	-	-	-	↑	↑	-	-	↑	↑	↑	-

### Historic Environment Alternative 1 Protect only designated heritage assets and their settings

Commentary: The current situation where designated heritage assets and their settings are protected is generally seen as providing a positive environment where businesses want to locate. This provides interest, attracting workers to the City's varied built environment and opportunities for social and cultural facilities and education.

Timescale: Short, medium and long term

Geographic scale: local regional and national – some heritage assets are of national importance

Temporary or permanent: Permanent – failure to protect heritage assets could lead to permanent loss

**Historic Environment Alternative 2 Protect designated and non-designated heritage assets and their settings**

Commentary: Protecting more heritage assets could limit economic development in some areas. The impact of further protection on the public realm could be beneficial if an appropriate balance was struck between preservation and public realm enhancement around newly designated assets. More protected spaces would enhance health and wellbeing associated with historic and cultural environment.

## Tall buildings and views protection

**I&O Question 4.8:** Should further intensification be encouraged within the Eastern Cluster? Should the current policy area be retained or should it be modified? If so where and how?

**I&O Question 5.9:** Should we maintain the current approach to local view protection in the City? If not, how should the approach be changed and which views should be affected?

**I&O Question 5.12:** Should we continue to promote tall building development in the City and should these buildings continue to be clustered? Should the current tall building cluster in the east of the City be altered? Are there any other areas of the City which could accommodate tall buildings without compromising its distinctive character and heritage?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greenery	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Tall Buildings	Alternative 1 Promote tall buildings in the existing eastern cluster only	↕↑	↕↑	↑	↑	⊠	⊠	↕↑	↕↑	-	↓	-	-	-	-	-
Tall Buildings Views protection	Alternative 2 Protect additional views	↓	↕↑	-	↑↑	-	↑	↑	↑↑	-	↑	-	↑↑	-	-	-
Tall Buildings	Alternative 3 Allow tall buildings in appropriate locations	↑↑	↕↑	↕↓	↓	-	⊠	↑	↕↑	-	⊠	-	-	-	-	-

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban green spaces	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	outside of strategic views and St Paul's Heights elsewhere in the City															

**Tall Buildings Views protection Alternative 1: Promote tall buildings in the existing eastern cluster only**

There is a finite limit to the concentration of tall buildings that can be accommodated in the Eastern Cluster without causing congestion affecting servicing of buildings and the attractiveness of the public realm. If tall buildings were to be restricted to the Eastern cluster this could affect economic growth by restricting the total additional business floorspace in the City. However the clustering of tall buildings to provides an attractive business environment and assists in provision of collective security.

Concentrating tall buildings in the eastern cluster would increase the need for waste management higher up the waste hierarchy to reduce the need for transport of waste off site in congested streets. Clustering tall buildings could lead to adverse impacts on daylight and sunlight within this area. This option would provide greater opportunities for district heating and cooling networks to supply clustered buildings but could exacerbate the urban heat island effect. This option would put more pressure on the scarce open spaces in the eastern cluster but this could be mitigated through building design creating public open space at ground level and terraces and viewing galleries elsewhere within buildings. Concentrating tall buildings in a small area could have negative transport implications resulting in congestion of servicing and delivery vehicles. The high density of development in the eastern cluster could have detrimental impacts particularly on mental health.

Timescale: Medium to long term

Geographic scale: Local - Eastern cluster

Temporary or permanent: temporary – it would be possible to reverse the high density in future but unlikely since reductions in floorspace on redevelopment are unlikely to be viable.

### **Tall Buildings Views protection Alternative 2: Protect additional views**

Commentary: Protecting additional views would further restrict the potential for development of employment space to serve the business City. This option would further limit the efficient use of land but could assist in avoiding the traffic and pedestrian congestion associated with tall buildings. It would provide more protection for historic buildings at a regional scale and would reduce potential for light pollution and overshadowing and microclimate impacts associated with tall buildings. This option would result in retention of open spaces elsewhere in London as viewing points and encouragement of visitors to view cultural attractions.

Timescale: Medium to long term

Geographic scale: City wide and beyond

Temporary or permanent: Temporary – it would be possible to reverse the protection in future

### **Tall Buildings Views protection Alternative 3: Allow tall buildings in appropriate locations outside of strategic viewing corridors and St Paul's Heights elsewhere in the City**

Allowing tall buildings elsewhere in the City provides greater potential for flexibility to meet the needs of business for additional floorspace. This option would enable distribution of tall buildings to other parts of the City thus avoiding congestion of the public realm in the eastern cluster but potentially affecting the settings of more heritage assets. Provision of tall buildings could lead to adverse impacts on daylight and sunlight in the surrounding area. Tall buildings can provide a base load for district heating and cooling networks. Tall buildings elsewhere in the City would put pressure on the open spaces nearby but the design of buildings could provide new open spaces. Tall buildings could create local servicing and delivery problems depending on the surrounding road network. Spreading the tall buildings to other parts of the City is less likely to lead to mental health problems associated with high density urban stresses.

Timescale: Medium to long term

Geographic scale: City wide and beyond if tall buildings affect skyline and views

Temporary or permanent: Temporary - it would be possible to reverse the high density in future but unlikely since reductions in floorspace on redevelopment are unlikely to be viable

## Energy CO2 emissions

**I&O Question 6.1:** *Should we identify and positively plan for infrastructure such as district heating and smart grid technologies to enable a more sustainable, low carbon future for the City? What technologies and infrastructure are likely to be viable and operationally feasible in the City? Should they be required in certain types of developments?*

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Energy CO2	Alternative 1 Assist developers to achieve zero carbon by strategic planning for energy	↕	↑	-	-	↕↕	↑	↑	-	-	↕↕	-	-	↑	-	-
Energy CO2	Alternative 2 Continue the current practice of site by site energy planning	↕	ⓘ	-	-	ⓘ	↓	↑	-	-	ⓘ	-	-	↑	-	-

### Energy CO2 Alternative 1: Assist developers to achieve zero carbon standards by strategic planning for Energy

Commentary: Strategic planning for energy will enable infrastructure to be provided enabling businesses to adopt low carbon energy solutions, with the least disruption to the public realm and transport network but energy infrastructure is expensive to install. A co-ordinated approach should avoid on-site CHP which is more damaging to air quality, by promoting decentralised energy infrastructure on a wider scale. This could include energy from waste serving the city from sites beyond the City boundary.

Reducing energy & CO2 emissions will have long term benefits reducing climate change effects on health (overheating flooding etc)

Timescale: Medium to long term

Geographic scale: local – City and surrounding boroughs

Temporary or permanent: permanent – if infrastructure is enabled this could lead to a permanent change in the way energy is supplied and carbon emissions reduction. Increasing CO2 emissions will lead to permanent change in climate

### **Energy CO2 Alternative 2: Continue the current practice of site by site energy planning**

Commentary: A piecemeal approach to energy planning could result in uncoordinated impacts on public realm and transport network. Site by site approach could lead to more emissions from on-site CHP and is unlikely to include energy from waste.

Reducing energy & CO2 emissions will have long term benefits reducing climate change effects on health (overheating flooding etc)

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Permanent – failure to address CO2 emissions will lead to permanent change in climate

## Air quality

**I&O Question 6.3** Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so what should they include?

**I&O Question 6.7** How can we reduce the impact of motor vehicles traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Air Quality	Alternative 1 Implement local solutions such as reassignment of vehicle space and stricter emission limits	↓	↑	↑	↑	↓	↑	↓	↑	↑	↑	↑	↑	↑	-	↑
Air Quality	Alternative 2 Employ London-wide initiatives only	↓	↑	-	↑	↓	↑	↓	-	-	↑	↑	↑	↑	-	↑

### **Air Quality Alternative 1: Implement local solutions such as reassignment of vehicle space and stricter emissions limits**

Commentary: Radical changes to vehicle access or emissions limits could impact on costs of supplying and servicing City businesses. This option could improve the City's public realm alongside London wide initiatives which would reduce diffuse

pollution arising outside the City, and tighter London wide limits on construction emissions which come into force in 2020. Vehicle restrictions could provide some security benefits. Pollution impacts on the fabric of historic buildings would be reduced. Stricter emissions limits associated with demolition and construction could result in reduced waste if demolition becomes uneconomic. The impact of lowering emissions of PM10s and NOX could have uncertain impacts on carbon emissions depending on the response (if diesel is replaced by petrol vehicles CO2 emissions could rise). Reassignment of vehicle space could generate more open space, reduce noise impacts and improve residential amenity. Reduction in vehicle traffic and stricter emission targets could assist delivery businesses in neighbouring boroughs (costs will be less for these businesses than for those travelling further) and should lead to more efficient use of the remaining road space

Timescale: Medium to long term (these changes could take several years to implement)

Geographic scale: Regional

Temporary or permanent: Temporary - changes could be reversed

### **Air Quality Alternative 2: Employ London wide initiatives only**

Commentary: London wide initiatives will address some City air quality issues without local cost implications compared with other London business locations. London wide initiatives will improve the City's public realm to some degree. Stricter emission limits associated with demolition which will come into force in 2020 will improve emissions from construction work and could reduce waste if demolition becomes less viable. The impact of lowering emissions of PM10s and NOX could have uncertain impacts on carbon emissions depending on the response. If diesel is replaced by petrol vehicles CO2 emissions could rise if replaced by electric vehicles it depends on the source of the electricity used. London wide initiatives to tackle air quality should encourage more efficient use of road space leading to less congestion in the long term.

Timescale: Medium to long term

Geographic scale: Regional

Temporary or permanent: Temporary – changes could be reversed

## Transport

**I&O Question 6.4:** What actions could the City Corporation take to reduce congestion in the City?

**I&O Question 6.6:** Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?

**I&O Question 6.8:** How can more space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianised or time limited, or should certain types of vehicles be restricted in those areas?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Transport	Alternative 1 Site by site approach to transport & public realm	↕	↕	↕	⬇	↕	⬇	⬇	⬇	⬇	⬇	⬇	⬇	⬇	-	⬇
Transport	Alternative 2 Local Plan strategic approach to transport and public realm	↗	↗	↗	⬇	↗	↗	↗	⬇	⬇	↗	⬇	⬇	⬇	-	⬇
Transport	Alternative 3 Prioritise public transport	↗	↗	↗	↗	⬇	↗	↗	↗	↗	⬇	-	↗	↗	↗	↗
Transport	Alternative 4 Prioritise pedestrian and cycle movement	↕	↕	↕	↗	-	↗	↗	⬇	⬇	⬇	⬇	⬇	↗	⬇	⬇
Transport	Alternative 5	⬇	↗	↗	⬇	⬇	↗	↗	⬇	⬇	↗	⬇	⬇	⬇	⬇	⬇

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greenery	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	Manage vehicle movement through restrictions & consolidation centres															

### Transport Alternative 1: Site by site approach to transport and public realm

Commentary: This approach could result in lack of co-ordination leading to congestion which is detrimental to the local economy and to the public realm. Although this approach has been successful during the period of the current Local plan further intensification may result in more acute problems resulting in the need for collective security measures or consolidated transport of goods and waste in the future. Open spaces and biodiversity are not necessarily protected since this option only considers impacts from individual sites in isolation. A site by site approach may consider the needs of residents, and visitors in a fragmented way with uncertain impacts on residential amenity, social and cultural facilities and health.

Timescale: Short to medium term

Geographic scale: Local but with regional implications

Temporary or permanent: Temporary

### Transport 2: Local Plan strategic approach to transport and public realm

Commentary: A strategic approach will take account of a range of factors and interactions between them. This is likely to enhance the public realm and enable implementation of collective security measures and measures to reduce transport emissions. Waste transport could be considered strategically enabling sustainable transport via river or rail where appropriate. Open spaces and

biodiversity are not necessarily protected. A strategic approach focussing on transport and movement could fail to take account of residential amenity social, cultural and health facilities.

Timescale: Medium to long term

Geographic scale: Regional

Temporary or permanent: Temporary – strategy could be adjusted and impacts reversed

### **Transport Alternative3: Prioritise public transport**

Commentary: This option enables access for all to job opportunities, social health and education facilities whilst minimising damage to the environment. Reduced air pollution protects historic assets, open spaces and biodiversity from damage. This option could be detrimental to other road users such as servicing and waste vehicles. Prioritising public transport on the roads could be detrimental to cyclists depending on designs for road layouts.

Timescale: Short, medium and long term

Geographic scale: Regional

Temporary or permanent: Temporary

### **Transport Alternative 4 Prioritise pedestrian and cycle movement**

Commentary: Balance is required between pedestrian/ cycle and vehicle movements – pedestrian/ cycle priority could be detrimental particularly for buses and delivery/service vehicles. Prioritising cycling is positive for the safety of cyclists but could lead to conflicts between cyclists and pedestrians. Lower pollution levels will be beneficial for historic buildings. The impact of this option on open spaces, biodiversity, overall transport and movements, housing, social facilities and education will depend on the specific measures that are implemented. Greater use of active transport modes will reduce emissions and improve health outcomes.

Timescale: Short to medium term

Geographic scale: Local but with regional implications

Temporary or permanent: Temporary – could be reversed in future to allow more vehicles

### **Transport Alternative 5 Manage vehicle movement through restrictions and consolidation**

Commentary: Outcomes would depend on the specific restrictions that are put in place however the positive management of vehicle movements should improve the public realm and reduce vehicle emissions within and beyond the City. Use of consolidation centres could

enable vehicle security checking before vehicles enter the City. Restrictions would need to take account of the time banding currently in place for waste collection. The impact of this option on open spaces, biodiversity, housing, social facilities, health and education will depend on the specific measures that are implemented.

Timescale: medium to long term

Geographic scale: regional

Temporary or permanent: Temporary – could be reversed in future

## Waste

**I&O Question 6.11:** What measures could we take to secure waste reduction associated with development? Should we promote circular economy principles, zero waste plans and on-site management of waste for large developments?

**I&O Question 6.12:** Should we continue to rely on waste management facilities outside the City? If so, how should we co-operate with other waste planning authorities to ensure adequate and appropriate planning for waste?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Waste	Alternative 1 Promote circular economy, zero waste plans and on-site waste management	↓	↑	↑	-	↑↑	↓	↑	-	-	↑	-	-	↓	-	-
Waste	Alternative 2 Develop local facilities for waste management	↓	↓	-	-	↑↑	↓	↑	↓	↓	↑↑	-	-	-	-	-
Waste	Alternative 3 Continue to rely on waste facilities elsewhere	↓	↑↓	-	-	↓↓	↑↓	↓	-	-	↓↓	-	-	↓	-	-

**Waste Alternative 1: Promote circular economy, zero waste plans and on-site waste management**

Commentary: On site waste management would reduce commercial office space. Waste reduction and on site waste management reduces need for on street waste collections with potential for anti social behaviour. Impact of on-site waste management on local air quality are uncertain. Reduced waste transport will reduce carbon emissions and improve air quality.

Timescale: Medium to long term

Geographic scale: Regional

Temporary or permanent: Temporary

### **Waste Alternative 2: Develop local facilities for waste management**

Commentary: Requiring local waste facilities through provision of land in the City will reduce potential use of floorspace or land for businesses. Local facilities could have detrimental local impacts on public realm through waste deliveries and processing. This option would enable waste to be managed further up the waste hierarchy with a reduction in waste transport and associated emissions. Local waste facilities could take up scarce open space and increase nuisance but could enable additional uses within open spaces. Provides potential for generating energy or compost from waste locally.

Timescale: medium to long term

Geographic scale: City, London and wider south east England

Temporary or permanent: Temporary – waste sites could revert to other uses in future

### **Waste Alternative 3: Continue to rely on waste facilities elsewhere**

Commentary: Waste facilities elsewhere are likely to increase in cost as waste planning authorities reduce capacity for imported waste but use of City land for waste would be uneconomic use of valuable land with detrimental impacts on public realm.

Transport of waste adds to traffic volumes, air pollution and carbon emissions with impacts on health. Larger more cost effective facilities elsewhere could be better managed to protect the environment than many smaller facilities.

Timescale: short to medium term

Geographic scale: City, London and wider south east England

Temporary or permanent: Temporary – waste facilities can be changed to other uses in future

## Flood risk

**I&O Question 6.15:** Should we require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area? If so what measures should be specified?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation and adaptation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Flood risk	Alternative 1 Require flood resilience measures in development schemes at risk of flooding	↓	↑	-	↑	-	↑	↑	↑	↑	-	-	-	↑	-	↑
Flood risk	Alternative 2 Rely on building owners to install flood resilience measures	⬇	⬇	-	⬇	-	⬇	⬇	⬇	⬇	-	-	-	⬇	-	⬇

### Alternative1: Require flood resilience measures in development schemes at risk of flooding

Commentary: Cost and space required for resilience measures could impact economy. Ensures that resilience measures are incorporated into designs where needed and protecting historic assets. Well designed flood resilience measures will assist in minimising danger of contamination through flooding. Will enable standard design of flood resilience measures along river Thames – City’s largest open space. Suitable flood resilience measures to account for disability etc

Timescale: Medium to long term

Geographic scale: Local

Temporary or permanent: Temporary

### Alternative: Rely on building owners to install flood resilience measures

Commentary: Uncertainty regarding whether building owners will install flood resilience measures and what type of measures.

Could result in ad hoc measures

Timescale: Medium to long term

Geographic scale: Local

Temporary or permanent: Temporary

## Open spaces

**I&O Question 7.1:** Should we continue to protect or enhance the existing open spaces in the City? How can we deliver more open space in the City?

Issue	Alternatives	Economic growth	Built environment and public realm	Safe environment and crime	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	Equality and inclusion
Open space	Alternative 1 Protect all existing open space	↕	↑	-	↑	-	↑	↑	↑	↑	↑	-	↑	↑	-	↕
Open space	Alternative 2 Allow development on some open space	↕	↕	-	↕	-	↓	↓	↕	↓	↕	-	↕	↕	-	↕
Open space	Alternative 3 Require additional open space to be provided with development	↕	↑	-	↑	-	↑	↑	↑	↑	↑	-	↑	↑	-	↕

### Alternative 1: Protect all existing open space

Commentary: Provides attractive environment with space for relaxation but restricts development of offices. Protects existing historic parks and gardens. Existing open space provides opportunity for air quality improvement, climate mitigation & resilience

and biodiversity. Provides pleasant walking routes, opportunities for social interaction with health benefits. Equality impacts depend on whether open spaces are open to the public.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary – could be reversed in future

### **Alternative 2: Allow development on some open space**

Commentary: Could reduce the attractiveness of the City for businesses and workers and put additional pressure on remaining public realm. Limited development of facilities such as toilets and sports facilities could enable better use of open spaces. May affect historic parks and gardens or settings of historic buildings. Would reduce area of green space with detrimental impacts for air quality, carbon emissions and biodiversity. Could lead to loss of pedestrian routes. May restrict opportunities for social interaction. Equality impacts depend on whether open spaces are open to the public.

Timescale: Short, medium and long term

Geographic scale: Local

Temporary or permanent: Permanent – once built on, open space is likely to be lost forever

### **Alternative 3: Require additional open space to be provided with development**

Commentary: Could impact on viability of development but provides an attractive environment. Protects existing historic parks and gardens and could improve settings of historic assets. Provides more space with potential for positive impacts on air quality, carbon emissions and biodiversity. Provides pleasant walking routes with potential for additional pedestrian links, opportunities for social interaction with health benefits. Equality impacts depend on whether open spaces are open to the public.

Timescale: Short, medium and long term

Geographic scale: Local

Temporary or permanent: Temporary, although planning obligations can require maintenance for a set period

## Retailing

**I&O Question 7.5:** Should the number or role of the Principal Shopping Centres be modified and / or should the boundaries of existing PSCs be amended? Is it still an appropriate policy objective to prioritise A1 units over other retail uses in PSCs?

**I&O Question 7.6:** Do the retail links still serve a clear purpose or should we allow retail uses throughout the City? Should isolated retail units continue to be protected?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Retailing	Alternative 1 Continue to focus A1 retail uses in existing Principal Shopping Centres and other retail in Retail Links	↕	↑	↑	↑	↑	-	-	-	-	↑	-	↑	-	-	-
Retailing	Alternative 2 Modify number or role of Principal Shopping Centres (e.g. remove A1 priority in PSCs)	↑	↑	↑	↓	↑	-	-	-	-	↓	-	↓	-	-	-
Retailing	Alternative 3 Consider retail development	↓	↓	↓	↓	↓	-	-	-	-	↓	↓	↓	-	-	-

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	throughout the City adopting a site by site assessment															

**Retail Alternative 1: Continue to focus A1 retail uses in existing Principal Shopping Centres and other retail in Retail Links**

Commentary: Retail uses support the business City and extend the range of job opportunities in the City but focussing it in PSCs could prevent expansion to other parts of the City. Focussing retail enables more effective security/policing, waste collection and deliveries & servicing. Current PSCs include historic areas such as Leadenhall Market and Fleet Street. Focussed retail provides opportunities for collective climate mitigation and resilience measures and suitable open spaces for shoppers. PSCs provide vibrant social environment. Impact on transport and cultural facilities depends on what measures are implemented

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Retail Alternative 2: Modify the number or role of Principal Shopping Centres (e.g. remove A1 priority in PSCs)**

Commentary: Retail uses support the business City and extend the range of job opportunities in the City. This option should ensure that all areas of the City are well served with retail. Focussing retail enables more effective security/policing, waste collection and deliveries & servicing. Identification of new PSCs is needed to establish whether the areas chosen and associated policies will result in protection for historic assets such as those at Smithfield General Market and Poultry Market. Focussed retail provides opportunities for collective climate mitigation and resilience measures and suitable open spaces for shoppers. PSCs provide vibrant social environment

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Retail Alternative 3: Consider retail development throughout the City adopting a site by site assessment**

Commentary: Retail uses support the business City and extend the range of job opportunities in the City. Allowing retail development throughout the City could weaken the role of PSCs reducing their attractiveness for time constrained workers but could provide local retail units close to workplaces. Dispersed retail could make servicing, security and policing more problematic and make collective public realm enhancements less likely. Site by site assessment will determine whether heritage assets are conserved with each site being considered separately. Dispersed retail provides utility without providing a collective social experience and could impact on residential amenity if shops open late near residential premises.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Temporary

## Housing numbers

**I&O Question 7.8:** Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Housing Numbers	Alternative 1 Plan to meet London Plan target only (141 units per annum)	↓	-	-	↑	-	-	-	-	-	↑	↑	↓	↓	↓	↓
Housing Numbers	Alternative 2 Plan to meet the level of need identified in the SHMA (125 units per annum)	↓	-	-	↑	-	-	-	-	-	↑	↑	↓	↓	↓	↓
Housing numbers	Alternative 3 Plan to significantly exceed the London Plan housing target	↓↓	↓	↓	↓	↓	↓	↓	↓	↓	↑	↑↑	↓	↓	↓	↓

### Housing Numbers Alternative 1: Plan to meet London Plan target only (141 units per annum)

Commentary: Economic growth could be affected by the cost and availability of housing in London. Any additional housing contributes to alleviating this pressure on housing but housing in the City can restrict the use of adjoining land for employment.

This option could provide beneficial uses for historic buildings. Provision of housing will reduce the need to travel for some individuals. More housing will put more pressure on social, health and educational facilities but this will be limited with low numbers of additional housing. Impact on equality will depend on the type of housing provided

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Permanent – housing unlikely to change to other uses in future

### **Housing Numbers Alternative 2: Plan to meet the level of need identified in the SHMA (125 units per annum)**

Commentary: Economic growth could be affected by the cost and availability of housing in London. Any additional housing contributes to alleviating this pressure on housing but housing in the City can restrict the use of adjoining land for employment.

This option could provide beneficial uses for historic buildings. Provision of housing will reduce the need to travel for some individuals. More housing will put more pressure on social, health and educational facilities but this will be limited with low numbers of additional housing. Impact on equality will depend on the type of housing provided

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Permanent – housing unlikely to change to other uses in future.

### **Alternative3: Plan to significantly exceed London Plan housing target**

Commentary: Compromises City's position as global financial business centre. This option could increase the number of residents in the City to a point where further supporting health and education services are needed thus putting pressure on available land and public realm. More residents result in more opportunity for crime but greater degree of surveillance. Could provide beneficial uses for historic buildings but new residential blocks may also be needed to significantly increase housing – may conflict with heritage. Higher levels of waste generated and water use by households. Increases opportunity for decentralised energy networks through providing different load profile from offices but more residents lead to higher energy use & carbon emissions. Could put additional pressure on open spaces and biodiversity. More housing in the City would reduce the need to travel if residents also work in the City. Impact on equality depends on the type of housing provided.

Timescale: Medium to long term

Geographic scale: Local

Temporary or permanent: Permanent – housing unlikely to change to other uses in future.

## Housing location

**I&O Question 7.7:** Should we define the boundaries of existing residential areas more clearly to indicate where in the City further residential development will be permitted? Or should residential development be permitted anywhere in the City as long as the particular site is not considered suitable for office use and residential amenity consistent with a city centre location can be achieved?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate change mitigation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Housing Location	Alternative 1 Restrict new housing to established residential clusters	↑	↑	↑	-	↑	↑	-	↑	-	↑	↑	↑	↑	↑	↑
Housing Location	Alternative 2 Permit housing anywhere in the City if site is unsuitable for office use	↓	↕	↕	↑	↓	-	-	-	-	↕	↕	↕	↕	↕	↕

### Housing Location Alternative 1: Restrict new housing to established residential clusters

Commentary: Clustering of housing protects businesses from the need to preserve amenity for residents and assists in collective security for residential properties. This option enables efficient waste collection and the provision of health and education services. This option enables efficient delivery and servicing of residential communities, provides suitable loads for CHP and provides opportunities to provide suitable open space for social interaction between residents.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Permanent – housing unlikely to change to other uses in future

**Housing Location Alternative 2: Permit housing anywhere in the City if site is unsuitable for office use**

Commentary: Permitting housing anywhere in the City could lead to isolated dwellings where provision of services and security is problematic. This option could enable beneficial uses for historic buildings. It could cause inefficiencies in waste collection, delivery and servicing arrangements and provision of health and educational support.

Timescale: Short to medium term

Geographic scale: Local

Temporary or permanent: Permanent – housing unlikely to change to other uses in future

## Affordable housing

**I&O Question 7.11:** Should the level of affordable housing required in the City be increased to allow the supply of rented affordable housing to be retained alongside starter homes? Is the approach to seeking commuted sums and delivering affordable housing acceptable?

Issue	Alternatives	Economic growth	Built environment and public	Safe environment and crime	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	Equality and inclusion
Affordable Housing	Alternative 1 Retain current affordable housing targets	↕	-	-	-	-	-	-	-	-	-	↑	↑	↑	↑	↑
Affordable Housing	Alternative 2 Increase level of affordable housing required	↕	-	-	-	-	-	-	-	-	-	↑	↑	↑	↑	↑

### Affordable Housing Alternative 1: Retain current affordable housing targets

Commentary: Lack of affordable housing could impact on recruitment for City businesses but this level of affordable housing is unlikely to address the wider issue. Affordable housing requires supporting social, cultural, health and education facilities – more affordable housing the more cost effective this is to provide.

Timescale: Short to medium term

Geographic scale: Local and London – affordable housing requirements for City developments are frequently provided elsewhere

Temporary or permanent: Temporary – affordable housing status could change

**Affordable Housing Alternative 2: Increase level of affordable housing required**

Commentary: Lack of affordable housing could impact on recruitment for City businesses - this level of affordable housing is unlikely to address the wider issue. Affordable housing requires supporting social, cultural, health and education facilities – more affordable housing the more cost effective this is to provide.

Timescale: Short to medium term

Geographic scale: Local and London – affordable housing requirements for City developments are frequently provided elsewhere

Temporary or permanent: Temporary – affordable housing status could change

## Social and community infrastructure

**I&O Question 7.14:** Should we plan to meet the need for social and community services in full within the City, or work with partners in neighbouring boroughs?

Issue	Alternatives	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	Equality and inclusion
Social and community infrastructure	Alternative 1 Meet need for social and community infrastructure in the City	↓	-	-	-	↓	-	-	-	-	↑	↓	↑	↑	↑	↑
Social and community infrastructure	Alternative 2 Work with partners in neighbouring boroughs to meet social and community infrastructure needs	↑↑	-	-	-	↑↑	-	-	-	-	↓↓	↑↑	↑	↑↑	↑↑	↑

### Alternative1: Meet need for social and community infrastructure in the City

Commentary: This option could use floorspace that is needed for commercial development. Could lead to increased hazardous waste in the City from health facilities. Reduces the need to travel for residents visiting health facilities etc. Could occupy space which would be better used for housing. Local facilities provide easier access and contribute to sense of community but associated costs could reduce the range of health, education or social facilities provided. Local facilities provide easier access for disabled or less mobile older people

Timescale: Medium term

Geographic scale: Local

Temporary or permanent: Temporary

**Alternative2: Work with partners in neighbouring boroughs to meet social and community infrastructure needs**

Commentary: Frees up premises for commercial development in the City. Larger scale facilities better for waste management and transport. Increases need to travel for residents visiting health facilities etc. More efficient use of space since facilities will serve a wider community. Provides facilities elsewhere which are more difficult for City residents and workers to access. Provides access to a wider range of services due to economies of scale/ reduced cost of provision per head. Could be less accessible for some less mobile residents but wider range of facilities which could provide for the needs of different races or religious groups.

Timescale: Short to medium term

Geographic scale: Regional City, neighbouring boroughs and outer London for facilities associated with open spaces

Temporary or permanent: Temporary