

City of London

Appendix 5

IIA Assessments (Draft City Plan 2036)

Local Plan Review

Environmental Report

Proposed Submission Draft

March 2021



Appendix 5 IIA Assessments – Draft City Plan 2036 policies

Assessments were carried out on the versions of policies that were considered by Members of the Local Plan Sub Committee during the period between October 2017 and October 2018. The assessments identified areas where policies could be improved to align with the IIA objectives.

Table 1: IIA Assessment Framework

	Impact of implementing policy	Response to IIA assessment
↑	Significant positive impact	Consider whether further enhancement is possible
↑	Positive impact	Consider whether further enhancement is possible
⬆	Uncertain impact	Consider policy wording changes and/ or mitigation and monitoring
↑↓	Both positive and negative impacts	Consider policy wording changes and/ or mitigation and monitoring
↓	Negative impact	Consider policy changes and/or mitigation
↓	Significant negative impact	Consider changing the policy
N	No impact	N

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

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

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

Flourishing Society

Healthy & Inclusive City

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Healthy and inclusive City	↑ (1)	↑ (2)	N	N	N	↑↑ (3)	↑↑ (4)	↑ (5)	↑ (4)	↑ (2)	↑ (6)	↑ (7)	↑↑ (8)	↑ (6)	↑ (9)
DM	Inclusive buildings and spaces	↑ (1)	↑ (2)	↑ (10)	↓ (11)	N	N	N	↑ (5)	N	↑ (2)	↑ (6)	↑ (12)	↑↑ (9)	↑↑ (13)	↑↑ (9)
DM	Air quality	↓ (13a)	↑ (2)	↓ (10)	↑ (11)	↑ (3)	↑↑ (3)	↑↑ (4)	↑ (5)	↑ (4)	↑↑ (2)	↑ (6)	N	↑↑ (8)	↑ (6)	↑ (9)

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Noise and light pollution	↕ (13a)	↑ (2)	↑ (10)	↕ (11)	N	↕ (3)	↑ (14)	↑ (2)	↑ (15)	N	↑ (6)	↑ (7)	↑ (8)	↑ (6)	↑ (9)
DM	Contaminated land	N	↑ (2)	↑ (10)	N	N	↕ (3)	N	↑ (2)	↑ (2)	N	N	N	↑ (2)	N	N
DM	Location and protection of s & c facilities	↕ (13a)	N	↑ (10)	↑ (13b)	N	N	N	N	N	N	↑ (6)	↑ (1)	↑ (5)	↑ (5)	N

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Public conveniences	↑ (13a)	↑ (20)	↓ (13a)	N	N	N	N	↑ (20)	N	↑ (20)	N	N	↑ (20)	N	↑ (20)
DM	Sport and recreation	↑ (1)	↑ (17)	N	N	N	N	N	↑ (21)	↓ (21)	N	↑ (6)	↑ (6)	↑ (7)	↑ (6)	↑ (10)
DM	Play areas	↓ (16)	↑ (17)	↑ (10)	N	N	N	N	↑ (16)	↓ (16)	N	↑ (18)	↑ (18)	↑ (19)	↑ (19)	↑ (17)

Comments:

1. An environment that is healthy and inclusive with appropriate facilities will attract businesses and skilled workers. There will be additional costs for developers, but on balance these costs will be outweighed by the benefits.
2. Buildings, spaces and nearby roads will be better quality if air, noise, light, soil pollution is reduced.
3. The environment will be improved with less pollution (including from deconstruction waste).
4. Greening open spaces and the public realm to improve air quality will help mitigate the effect of the urban heat island and improve biodiversity.
5. Creating healthier and inclusive spaces with appropriate facilities will improve people's enjoyment of open spaces and public realm for workers, residents and visitors.
6. Residents and students will benefit from healthier and inclusive buildings, open spaces with recreational facilities and public realm, particularly schools and nurseries.
7. Healthier facilities improve people's health.
8. A large healthy workforce that lives all over the south-east will have regional benefits.
9. Healthier and inclusive spaces will encourage greater usage and therefore more mixing of people. Greater access to jobs and facilities.
10. A wider range of people visiting because better environment will create a safer environment through surveillance and community cohesion.
11. It is unclear how this policy will apply to heritage assets including education and interpretation. Mitigation in design policy.
12. More inclusive buildings will encourage use of social and community facilities.
13. More inclusive spaces will encourage educational trips.
- 13a. Could impose additional costs and constraints on business e.g security and policing costs.
- 13b. Maintains variety of uses including in historic buildings.
14. Reducing light pollution will help reduce energy consumption.
15. The reduction of light and noise will encourage wildlife and biodiversity.
16. Play areas may impact and compete with open spaces and the business City.
17. Well-designed play areas and recreational facilities will encourage people to use outdoor space, will increase surveillance, and social inclusion. Accessible play areas increase inclusion.
18. Play facilities make housing attractive for families.
19. Opportunities for play improve health and educational experiences.

20. Public conveniences allow people to visit the City, access work, leisure, educational and cultural opportunities thereby encouraging inclusiveness.

21. Recreation facilities could impact on biodiversity and greening and compete with commercial development.

Proposed Mitigation:

- Review policies on play and sport and recreation to see if wording is sufficient to be able to avoid play areas causing disturbance to City businesses
- Review policies on sport and recreation facilities to see if wording is sufficient to avoid reducing greening and biodiversity opportunities.
- Add wording to policy on play provision to encourage inclusiveness between users of the play facilities and areas.

Safe & Secure City

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Safe & Secure City	↑↑↑ (1)	↑↓ (2)	↑ (1)	N	N	N	N	↑ (2)	N	↑↓ (1,2)	↑ (3)	N	↑ (3,4)	N	↑ (2,5)
DM	Crowded Places	↑↑↑ (1)	↑↓ (2)	↑ (1)	N	N	N	N	↑ (6)	N	↑ (7)	N	↑ (8)	N	N	↑ (2,5)
DM	Dispersal Routes	N	↑ (9)	↑ (9)	N	N	N	N	N	N	↑ (10)	N	↑ (11)	N	N	↑ (2,5)
DM	Designing in Security	↑↑↑ (1)	↑ (9)	↑ (9)	↑ (12)	N	N	N	↑ (6)	N	N	N	N	N	N	N

Comments:

1. Provides confidence for international businesses without undue visible presence
2. Security measures may inhibit accessibility
3. Improves residential amenity
4. Contributes towards stress reduction
5. promotes social and economic inclusion
6. the policy does not increase provision nor enhance the quality of open spaces
7. the policy promotes efficient public transport
8. the policy does not encourage a vibrant social environment
9. Prevents overcrowding. Reduces potential for ASB
10. Improved road safety
11. Provides for safe social spaces
12. Sympathetic to the public realm

Proposed Mitigation:

- Design policy mitigates the potential for security measures
- The Core Strategic Policy should be amended to include reference to Open Spaces.
- DMX: Crowded Places should be amended to include Open Spaces in the policy wording.
- DMX: Dispersal Routes should be amended to include reference to safe egress.
- DMX: Designing in Security should be amended to include reference to Open Spaces in the policy.

Housing

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and Inclusion
CS Housing	Protect existing housing and encourage additional housing.	↑↓ (1,2)	↑ (3,7)	N	N	N	N	N	N	N	↑ (4)	↑ (5)	N	N	N	↑ (6)
DM Location of new housing	Locate housing in Designated residential areas.	↑↓ (7)	↑ (7)	↑ (8)	N	N	N	N	N	N	↑ (4)	↑ (10)	↑ (10)	↑ (10)	↑ (10)	↑ (10)
DM Loss of housing	Resist the loss of housing.	↑ (11)	↑ (3)	N	N	N	N	N	N	N	N	↑ (3)	N	N	N	N
DM Residential environment	Ensure a pleasant residential environment for residents.	↑ (7)	↑ (10)	↑ (8)	N	↑ (13)	↑ (14)	N	N	N	N	↑ (10)	N	↑ (15)	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM Housing quality standards	Ensure high quality housing standards.	↕	↑(10)	↑(8)	N	↑(16)	N	N	↕(18)	↕(19)	N	↑(10)	N	↑(10)	N	N
DM Short-term residential letting	Manage short term letting so not mixed.	↕(31)	N	↕(8, 32)	N	N	↕	N	N	N	↑(20)	↕(30,31,20)	N	N	N	N
DM Student housing and hostels	Support student accommodation in appropriate areas.	↑(1)	↕(21)	↕(21)	N	N	N	N	N	N	↑(22)	↑(23)	N	N	↑(29)	↑(29)
DM The Temple	Allow Reasonable adjustments and flexibility in the Temples between offices and housing.	↑(24)	↑(24)	↑(8)	↑(24)	N	N	N	N	N	↑(25)	↑(25)	N	N	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM Older persons housing	Ensure a sufficient supply of appropriate housing for older people.	N	N	N	N	N	N	N	N	N	N	↕ (30)	N	↑ (26)	N	↑ 33)
Self and custom housebuilding	Encourage developers to consider self and custom build units.	N	↑ (27)	N	N	N	N	N	N	N	N	↑ (27)	N	N	N	N

Comments:

1. Protects commercial land uses.
2. Does not address housing shortage and costs for City workers.
3. Enables efficient use of land.
4. Provides some housing in City, City fringe and neighbouring boroughs (supporting text) reducing need to travel.
5. Provides housing in line with London Plan requirements.
6. Requires proportion of accessible housing.
7. Prevents conflicts between residents and businesses by clustering housing enhancing public realm.
8. Clustering housing enhances passive security.

9. Enables efficient waste management.
10. Clustering enhances residential amenity, access to services and decreases isolation.
11. Prevents single residential units blocking commercial development.
12. Allows loss of housing – could require contribution to housing provision elsewhere.
13. Protects other uses (eg waste) uses through “agent of change” principle.
14. Addresses noise pollution.
15. Protection of residential amenity good for mental health.
16. Provides area for waste and recycling bins.
17. Optional building control water standards (110L) not specified – but is covered by London Plan (105L) therefore may not be necessary.
18. Maximising opportunities for open space may not protect existing levels of open space – could mention multi-use open space.
19. Uncertain whether open spaces will be green.
20. Provides necessary business accommodation without need for daily commuting.
21. Uncertain what constitutes an “excessive concentration” of student housing – assume this is linked to ASB.
22. Restricts student housing to educational establishments in CAZ – reduces need to travel.
23. Provides suitable student housing reducing student occupation of mainstream housing.
24. Keeps historic buildings and gardens of Temples in active use for legal sector.
25. Provides accommodation for legal sector workers reducing the need for daily commuting.
26. Provides suitable housing for the City’s residents.
27. provides suitable options for self and custom housebuilding within the City’s high density environment
28. reduces materials transport associated with self build
29. Supports educational opportunities
30. May compete with permanent housing
31. May compete with offices

32. Short-term tenants may cause disturbance and increase crime

33. Meeting the needs of persons with a protected characteristic

34. Uncertain whether short-term lets will save resources

Proposed Mitigation:

- Resist the loss of housing: Discussed whether should add wording to suggest that when a housing unit is lost there should be some financial contribution to offset the loss.
- Process flagged up that we should be sure we are being consistent and say we don't want an over concentration of student housing as well as saying we don't want concentrations of hotels or short-lets. Don't want to single students out. Balance over concentration by balance of uses wording?
- Check if design policies mention that residential uses outside clusters and loss of individual units could protect at risk/historic buildings.
- Older persons housing: do we need a separate policy? – giving it too much emphasis? The fact that all housing has to include accessible units means older people could live in mixed developments to create mixed and balanced communities. Incorporate in general housing policy? Should wording indicate that we want elderly City people looking to downsize from a larger unit to a smaller one?

Thriving Economy

Offices

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Offices	↑↑↑ (1)	↑↓ (2)	N	↑↓ (3)	↓ (4)	↑ (8a)	↑ (8a)	N	N	↑↓ (5)	↓ (6)	N	N	↑↑ (10)	↑ (7)
DM	Office Development	↑↑↑ (1)	↑↓ (2)	N	N	↑↓ (13)	↑ (8)	↑ (8)	N	N	↑ (14)	N	↑ (14)	↑ (14)	↑ (14)	↑ (7)
DM	Protection of Existing Office Floorspace	↑↑↑ (1)	N	N	↑ (3)	N	N	N	N	N	N	↓ (6)	N	N	N	N

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DM	Temporary AlterNtive 'Meanwhile' use of office	↑ (12)	↑ (12)	↑ (12)	↕ (11)	↓ (11)	↕ (11)	↕ (11)	↕ (11)	↕ (11)	↕ (11)	N	↕ (11)	↕ (11)	↕ (11)	↕ (11)

Comments:

1. The City is an international important area for economic activity and office-based employment.
2. Efficient Land Use, but increased pressure on public realm and the City's skyline.
3. Offices within heritage assets will be protected, but increased development puts increased strain on heritage.
4. Increased development will generate increased levels of construction waste.
5. Increased worker density places more strain on public transport but development within the City makes efficient use of existing transport networks
6. Article 4 direction stops permitted development of B1 to housing
7. Policy encourages affordable workspace, reduce economic inequality
8. Promotes sustainable building design.
- 8a. no specific mention of sustainable design
9. The policy seeks high quality design and sustainability in new office developments

10. The policy will increase/retain office floorspace and therefore jobs in the City

11. Depends on the meanwhile use of the site

12. Brings into use an otherwise vacant site

13. Reduces need for future development by having flexible workspace

14. Reducing the need to travel with supporting uses

Proposed Mitigation:

- Negative impacts need to be mitigated through the design on new developments and their management.
- Be more specific in terms of what would be allowed as a meanwhile use.

Office growth

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	Low growth – only plan for what is already in the office pipeline 1.4m sq m	↓↓ (1)	↑ (4)	N	↑↓ (7)	↓↓ (8)	↑ (9)	↑ (9)	N	↑ (9)	↑↓ (11)	N	N	N	N	N
	Medium growth – plan to provide office floorspace to meet current GLA employment projections 2m sq m	↑↑↑ (2)	↑ (5)	N	↑↓ (7)	↓↓ (8)	↑ (9)	↑ (9)	N	↑ (9)	↑↓ (11)	N	N	N	N	↑ (14)
	High growth – plan to exceed GLA employment projections >2m sq m	↑↑ (3)	↓ (6)	↓ (6)	↑↓ (7)	↓↓ (8)	↑↓↓ (9)	↑↑↓ (9)	↓ (10)	↑ (9)	↓ (12)	↑ (13)	↑ (13)	↑ (13)	↑ (13)	↑ (14)

Comments:

1. Could provide too little office floorspace with regional implications for employment
2. In line with the GLA's employment projections for London
3. Could result in vacant office floorspace either in the City or elsewhere in London
4. Could reduce pressure on public realm
5. Planned floorspace in line with plans for public realm
6. Could increase pedestrian and vehicle congestion and put pressure on safety and security through over crowding
7. Offices within heritage assets will be protected, but increased development puts increased strain on heritage
8. Increased development will generate increased levels of construction and operational waste
9. Relies on sustainable design of new office floorspace compared with existing including urban greening
10. Will put additional pressure on open spaces
11. Increased worker density places more strain on public transport but development within the City makes efficient use of existing transport networks
12. Higher densities could over load transport network
13. Additional floorspace competes with other uses
14. Improved job opportunities

Proposed Mitigation:

Retailing

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and Inclusion
CS Retailing	The quantity and quality of the retail environment will be improved.	↑ (1)	↑ (2)	↑↓ (3, 4)	↑ (5)	↑ (11)	↑ (6)	↑ (12)	N	N	↑↓ (7)	↑↓ (8)	↑ (9)	N	N	↑ (10)
DM Principal Shopping Centres	To enhance the retail environment of the PSCs	↑ (1)	↑ (2)	↑↓ (3, 4)	↑ (5)	N	N	↑ (12)	N	N	↑↓ (7)	↑↓ (8)	↑ (9)	N	N	N
DM Retail Links	To connect the City's PSCs and provide connections	↑ (1)	↑ (2)	↑↓ (3, 4)	N	N	N	↑ (12)	N	N	↑ (7)	↑↓ (8)	↑ (9)	N	N	N
DM Ground floor retail	Retail uses will be permitted at	↑ (1, 13)	↑ (13)	↑ (3)	N	N	N	N	N	N	↑ (7)	↑ (13)	N	N	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and adaptation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
provision elsewhere in the City	ground floor level															
DM Specialist retail uses and markets		↑ (1, 14)	↕ (15)	↕ (3, 4)	↑ (5)	↓ (15)	↕ (6)	↕ (12)	↕ (16)	↕ (16)	↕ (7)	N	↑ (9)	N	N	N

Comments:

1. Retail contributes to the City's visitor economy and provides employment
2. Supporting retail uses that provide active frontage and vitality to public realm
3. Increases surveillance however potential issues regarding safety.
4. More risk of ASB and pickpocketing
5. Preserve and protect the existing PSCs and Retail Links some of which are located in historic markets. Impact on Leadenhall Market and Fleet Street uncertain
6. May result in increase of noise, light pollution and nuisance if not appropriately managed.
7. Increased public access at ground floor frontages would improve walking routes and convenient retail provision. In addition increased freight in same areas could impact on nearby residential amenity.
8. Increased retail provision would aid City residents but may result in ASB if premises not appropriately managed

9. Many retail uses provide and enhance social, community and cultural facilities for workers and residents

impacts i.e. fast food and pubs

10. Increased public access to retail units would aid equality and inclusion. Low-skilled jobs.

11. Uncertain as retail produces large quantities of waste e.g. plastic waste, coffee cups and packaging

12. Depends on how shops/market stalls are designed and serviced.

13. Protects office operation, residential amenity and PSCs

14. Improves vibrancy and variability of retail offer

15. Potential for increased waste from temporary markets – disposable waste

16. Not clear whether markets would be allowed in open spaces

Proposed Mitigation:

- Historic Environment policy provides mitigation for uncertainty regarding heritage assets in Leadenhall Market and Fleet Street
- Waste _{NA} could include supporting text promoting reuse/reduced packaging associated with high level of food retail in the City and appropriate waste management facilities and clean up procedures for temporary markets.
- Energy – could emphasise the design of shopfronts to minimise heat loss through doors, use of air-conditioning, and increased use of electric vehicles etc.
- Provide clarity about whether markets would be allowed in open spaces

Culture Visitors and Night-time Economy

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Culture, Visitors and the Night-Time Economy	Maintain and enhance London's world-class cultural offer and enable communities to access art, heritage and culture	↑↑ (1)	↑ (2)	↑ (2)	↑↑↑ (3)	↓ (4)	↓ (5)	↓ (12)	↑ (2)	↑ (2)	↓ (3a)	↓ (6)	↑ (7)	↑↑ (7)	↑↑ (7)	↑↑ (7)
DM Protection of existing facilities	Protect existing facilities.	↑↑ (1)	↑ (2)	↑ (2)	↑↑↑ (3)	↓ (4)	↓ (5)	↓ (12)	↑ (2)	↑ (2)	↓ (3a)	↓ (6)	↑ (7)	↑↑ (7)	↑↑ (7)	↑↑ (7)
DM Type and location of visitor facilities	Provide facilities such as seating, play and rest areas for spaces near visitor attractions.	↑ (1)	↑ (2)	↑ (2)	↑↑↑ (3)	↓ (4)	↓ (5)	↓ (12)	↑ (2)	↑ (2)	N	↓ (6)	↑ (7)	↑↑ (7)	↑↑ (7)	↑↑ (7)

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM Hotels	Only permit hotels if they don't displace offices or harm amenity.	↑ (8)	↑ (2)	↑ (2)	↑ (9)	↑ (4)	↑ (5)	↑ (12)	↑ (2)	↑ (2)	↑ (3a)	↑ (8)	N	N	N	N
DM Evening and night-time economy	Permit night-time economy facilities where do they do not cause undue disturbance.	↑ (1)	↑ (2)	↑ (2)	↑ (3)	↑ (4)	↑ (5)	↑ (12)	↑ (2)	↑ (2)	↑ (3a)	↑ (5)	↑ (7)	↑ (3)	N	↑ (7)
DM Public Art	Encourage public art in appropriate locations.	(↑)	(↑)	↑ (11)	(↑↑)	N	N	N	↑	N	N	N	↑ (7)	↑↑ (7)	↑↑ (7)	↑ (11)

Comments:

1. Increased culture and night-time activity and improvements to the public realm and open spaces will boost the economy.
2. Increased cultural development will green and improve the public realm as a pleasant public realm will be developed to cater for increased dwell time. More people will mean more surveillance.

- 3a. Increased cultural and night-time activity will result in more people using public transport and more service deliveries vehicles.
3. Increased cultural activity will result in maintenance of heritage assets as a pleasant environment will be created to cater for increased dwell time.
4. Increases in the cultural and night-time economy sector mean more waste will be produced although development may be carbon neutral. Need to minimise waste produced.
5. Increased activities may result in better public realm and improved land and water quality but night-time aspect and increased volume of people/traffic may increase noise/light pollution/nuisance.
6. Potential residential units may be displaced by cultural development but the improved environment and cultural activity will make the City a nice place to live.
7. Increased cultural activity, art, facilities for visitors and subsequent improved public realm will create a positive environment which will improve community cohesion and mental health and educational opportunities.
8. Hotels can boost the local economy but also displace potential office or housing development.
9. Boutique hotels can be the only viable use for historic buildings at risk.
10. Disturbance from night-time activities may impact on resident's mental health due to causing disturbance to sleep.
11. Public art enhances the public realm thereby creating pleasant and safe spaces encouraging social cohesion.
12. New cultural developments may use resources more efficiently but will still use resources.

Proposed Mitigation:

- Applicants must take into account waste that may be produced as a result of night-time economy schemes.
- To mitigate disturbance to residents from the night-time economy, planning and licensing departments need to work more closely together, as advised by the GLA.
- Added reference to minimising waste as an issue to be aware of.
- Added reference to need for planning and licensing to work more closely together.

Smart Infrastructure and Utilities

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Smart Infrastructure and Utilities	↑↑ (1)	↑ (2,3)	↑ (5)	↑↓ (2,3)	↑ (4)	N	↑ (4)	N	N	↑ (6)	N	N	N	N	N
DM	Infrastructure provision and connection	↑↑ (1)	↑ (7)	N	↑ (8)	↑ (4)	↑ (4)	↑ (4)	N	N	↑ (6)	N	N	N	N	N
DM	Infrastructure Capacity	↑ (1)	↑ (1)	N	N	N	N	↑ (9)	N	N	↑ (6)	N	N	N	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Pipe Subways	↑ (1)	↑ (10)	N	↑ (10)	N	↑ (10)	↑ (10)	↑ (10)	N	N	N	N	N	N	N

Comments:

1. The policy will facilitate state-of-the-art digital connectivity and utility infrastructure to support the business city enabling the City to grow and compete with other global financial and business centres. In turn, it will provide the business environment to attract and retain global financial, business services and TMT companies.
2. The policy aims to minimise adverse impacts on *inter alia*, heritage assets, therefore enhancing the built environment and the public realm.
3. The policy seeks to sustain and enhance the positive contribution made by built heritage to the City's environment.
4. The policy aims to reduce the demand for power.
5. the policy aims to provide effective security features within buildings and the public realm.
6. Good connectivity reduces the need to travel
7. Makes efficient use of land
8. The policy may have negative impacts on the City's heritage assets
9. Need to address the issue of over capacity
10. Piped subways provide protection and reduce visibility for unsightly infrastructure

Proposed Mitigation:

Include reference to heritage assets to ensure the provision of utilities and other infrastructure does not cause harm to same.

Outstanding Environments

Design

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Design	↑ (1)	↑ (2)	N	↑ (3)	↑ (4)	↑ (4)	↑ (4)	↑ (5)	↑ (5)	↑ (12)	N	N	↑ (8)	N	↑ (6)
DM	Sustainability Standards	↑↓ (13)	↑ (2)	N	N	↑ (4)	↑ (4)	↑ (4)	N	↑ (4)	↑ (4)	N	N	N	N	N
DM	New Development	↑ (1)	↑ (2)	↑ (14)	↑ (3)	↑ (4)	↑ (4)	↑ (4)	N	↑ (7)	N	N	N	N	N	↑ (6)
DM	Public Realm	↑ (1)	↑ (2)	↑ (14)	↑ (3)	N	↑ (5)	↑ (5)	↑ (5)	↑ (5)	↑↓ (15)	N	↑ (16)	↑ (8)	N	↑ (6)

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and adaptation	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Permeability	N	↑ (2)	↑↓ (17)	↑ (3)	N	N	N	N	N	↑ (9)	N	N	N	N	↑ (6)
DM	Terraces & Viewing Galleries	↑↓	↑ (2)	N	↑ (3)	N	N	N	↑ (18)	↑ (7)	N	↑ (18)	N	N	N	N
DM	Shopfronts	N	↑ (2)	N	↑ (3)	N	N	N	N	N	N	N	N	N	N	N
DM	Advertisements	N	↑ (2)	N	N	N	N	N	N	N	↑↓ (19)	N	N	N	N	N
DM	Daylight & sunlight	↓ (10)	↑ (20)	N	N	N	↑ (21)	N	↑ (21)	↑ (21)	N	↑ (11)	N	N	N	N
DM	Lighting	N	↑ (2)	N	↑ (3)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Good design creates a more desirable location for companies,
2. Policies actively look to enhance the quality of the build and public environment.
3. Policy provides protection and enhancements for heritage assets
4. Requirement for high BREEAM scores
5. Policy delivers improvements to open spaces
6. Policy promotes accessible buildings and public realm
7. Policy supports urban greening.
8. Improved public realm and open spaces provide health benefits
9. Increased permeability helps movement around the City
10. Stringent daylight/sunlight policies will stop many new developments
11. Protecting daylight/sunlight improves amenity
12. Policy promotes permeability of public realm
13. Greater BREEAM requirements increases construction costs
14. Safe public realm promoted in the policy.
15. Supporting text emphasises appearance rather than function of public realm
16. Health and inclusivity incorporated into several bullet points
17. Emphasises pedestrian permeability – servicing and vehicle permeability not addressed
18. Protects residential amenity
19. Avoids projecting adverts which may obstruct movement; but no mention of a-boards.
20. ensures adequate daylight & sunlight in line with BRE guidance
21. Policy protects the daylight/sunlight to open spaces.

Proposed Mitigation:

- Daylight & Sunlight policy needs to be altered to reflect the highly urban area of the City of London

Vehicular Transport and Servicing

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Vehicular transport & Servicing	↑↑↓↓ (1,1a)	↑ (2)	↑ (2)	N	↑ (1)	↑ (2)	↑↓ (2,3)	N	N	↑↑ (4,4a)	N	N	↑ (2)	N	N
DM	Impact of development on transport	↑ (6)	↑ (6)	N	N	↑↑ (5)	N	N	N	N	↑ (6)	N	N	N	N	N
DM	Freight & servicing	↑ (1)	↑ (2 7)	↑ (8)	N	⇕ (10)	⇕ (9)	⇕ (9)	N	N	⇕ (9)	N	N	⇕ (9)	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Vehicle parking	↑ (11)	↑↓ (12 12a)	↑ (13)	N	N	↑ (12)	↑ (12)	N	N	↑↓ (12 12a)	N	↑ (14)	↑ (12)	N	↑ (15)
DM	River transport	N	↑ (16)	N	N	↑ (17)	↑ (16)	↑ (16)	N	N	↑ (18)	N	N	↑ (16)	N	N
DM	Aviation landing facilities	↓↑ (19)	↑ (19)	↑ (20)	N	N	↑ (19)	N	N	↑ (19)	N	N	N	N	N	N

Comments:

- 1. Depends on how servicing / consolidation works
- 1a. Could increase costs for businesses serving the City
- 1b could reduce costs of delivery

2. Aims to provide safer, more attractive, streets with lower pollution levels for pedestrians keeping through traffic on London Access roads
3. Climate resilience not mentioned
4. Enables better movement of vehicles including outside the City by reducing vehicle numbers through consolidation
- 4a. Promotes and improves public transport provision
5. Construction logistics plans will cover waste movements
6. Transport plans ensure that transport issues are addressed for major development
7. Cargo bike and last mile deliveries could obstruct public realm
8. Opportunity to inspect vehicles before they come into the City
9. Consolidation centres could affect air quality, transport and movement in other boroughs increasing overall carbon emissions
- 9a. Some routes will improve but some may experience more traffic
10. not clear how waste consolidation will work and whether it will result in greater need for waste storage space
11. Enables use of land for productive activities – not just car parking
12. Reduces car use and associated congestion and air quality/ carbon emission impacts with improved health outcomes
- 12a. Reduces availability of short term parking for dropping off, deliveries and loading
13. Reduces risk of car related safety/ terrorist incidents in the City
14. Could release car parks for cultural events – temporary or meanwhile uses
15. Provides for car parking for Blue Badge Holders
16. Takes traffic off the roads but boats can be pollution with high carbon emissions
17. Waste transfer station at Walbrook wharf included in policy
18. Improves movement of goods and people
19. Protects environment from noise and disturbance associated with helicopters – no mention of drones
20. Allows for emergency response helicopters
21. Could deter some businesses but proximity to City Airport and improved links with other London airports provides alternatives

Proposed Mitigation:

Clear monitoring framework is needed to assess the impact of consolidation centres approach

Walking Cycling and Healthy Streets

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Movement and Healthy Streets	↑ (1)	↑↓ (2, 3)	↑ (2)	↑ (4)	N	↑ (5)	↑ (5)	↑ (6)	N	↑↓ (7)	N	N	↑ (8)	N	↑ (9)
DM	Pedestrian Movement	↑ (2)	↑ (2)	↑ (2)	↑ (10)	N	↑ (11)	↑↓ (11, 12)	↑ (6)	↑ (12)	↑ (8)	N	N	↑ (8)	N	↑ (9)
DM	Active Travel	↑ (2)	↑ (2)	↑ (2)	N	N	↑ (14)	↑ (14)	N	N	↑ (14)	N	N	↑ (13)	N	↑ (9)

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	Cycle Parking	↑↓ (15, 20)	↑↓ (16, 18)	↑ (17, 19)	N	N	↑ (14)	↑ (14)	N	N	↑ (14)	N	N	↑↑ (13)	N	N

Comments:

1. Depends on access for servicing
2. Provides safer more attractive pedestrian priority streets
3. Concentrates vehicles and pollution on surrounding streets
4. Not clear whether the superblock approach will respect historic street patterns
5. Air quality noise and climate resilience all addressed
6. Creates additional traffic free open spaces
7. Improves movement for pedestrians and cycles at the expense of vehicle movement e.g. buses
8. Healthier less polluted streets attract more active travel
9. Walking & cycling provide more equitable means of transport. Policy takes account of disabled people's needs
10. Historic routes safeguarded
11. Timed closures reduce pedestrian's exposure to poor air quality and reduce carbon emissions
12. No mention of climate resilience or greening of streets
13. Provision of changing facilities and cycle parking encourages active travel

14. Facilitating active travel reduces emissions from vehicles

15. Reduces space for offices but attracts City workers

16. Keeps streets clear of parked bikes

17. Provides secure cycle storage – reduced opportunity for theft

18. Cargo bikes making deliveries could cause congestion on pavements

19. Could mention facilities needed for folding bikes and scooters

20. Need monitoring of cycle parking use to check whether space continues to be available for cycle parking

Proposed Mitigation:

- Include mention of greening and climate resilience in text
- Could include reference to folding bikes and scooters in text

Historic Environment

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Historic Environment	↑↓ (1, 2)	↑↑↑ (3)	N	↑ (4)	N	N	N	↑ (9)	↑ (9)	N	N	↑ (7)	N	↑ (8)	↑↓ (11)
DM	Managing change to heritage assets	↑↓ (1, 2)	↑↑↑ (3)	N	↑ (4)	N	N	N	↑ (9)	↑ (9)	↑ (10)	N	↑ (7)	N	N	↑↓ (11)
DM	Ancient Monuments and archaeology	↑↓ (1, 2)	↑↑↑ (3)	N	↑ (4)	N	N	N	N	N	N	N	↑ (7)	N	↑ (8)	N
DM	Setting of the Tower of London WHS	↑↓ (1, 2)	↑↑↑ (3)	N	↑↑↑ (5)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Historic environment is unique selling point for the City

2. Could restrict development of business premises
3. Provides attractive place for national and international businesses & visitors
4. Local impact – policy applies within the City not beyond the boundary
5. National impact –protect universal value of UNESCO site which includes tower viewed from elsewhere in London
6. Reduces construction & demolition waste
7. Allows change of use preserves churches
8. Interpretation and publication encourages education
9. Includes protection for historic parks and gardens which provide biodiversity opportunities
10. Protecting routes through buildings encourages active travel
11. Tension between disabled access and protection of historic significance has not been resolved through this policy

Proposed Mitigation:

- Include reference in the supporting text to Historic England's guidance on inclusive access to historic buildings and sites
- References to interpretation should be included improving the impact on education

Tall Buildings and Protected Views

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Tall Buildings	↓ (1)	↑ (2)	↑↑↑ (6)	↑↑↑ (3)	N	↑ (7)	N	↑ (4)	N	N	N	N	N	N	↑ (5)
CS	Protected Views	↓ (1)	↑ (2)	N	↑↑↑ (3)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Constraints on development of tall buildings can have a detrimental effect on the City's economic development
2. Managing the location of tall buildings improves the build environment
3. Protection of views and conservation areas helps to protect heritage assets
4. Policy looks to protect existing open spaces while providing new spaces in/on buildings
5. Making buildings accessible improves the inclusivity of the City.
6. Using the CAA's maximum height of tall buildings for the safety of international flights.
7. Policy seeks to protect open spaces from environmental impacts

Proposed Mitigation:

Open Spaces and Green Infrastructure

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and Inclusion
CS Open Spaces and Green Infrastructure	Promoting a greener City.	↑ (1)	↑ (2)	↑↓ (2,10)	↑↓ (3,11)	N	↑↑ (4)	↑↑ (12)	↑ (13)	↑↑ (13)	↑ (5)	N	↑ (14)	↑ (6)	N	↑ (15)
DM Protection and provision of open spaces	Public open space will be maintained and improved.	↑ (1)	↑ (2)	↑↓ (2,10)	↑ (16)	N	↑↓ (17)	↑↓ (17)	↑ (13)	↑↓ (17)	↑ (5)	N	↑ (14)	↑ (6)	N	↑ (15)

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM City Greening	Urban greening should be integral to development	↕ (1,18)	↑ (2)	N	↕ (19)	N	↕ (4)	↕ (12)	↑ (13)	↕ (13)	N	↕ (18,20)	N	↑ (6)	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM Biodiversity	Development should incorporate measures to enhance biodiversity	↑↓ (1,9)	↑ (2)	N	↑↓ (3,11)	N	↑↑ (4)	↑↑ (12)	↑ (13)	↑ (13)	N	N	N	↑↓ (21)	N	N

Comments:

1. Huge economic benefits for GI, productivity of workers and how it makes the city a more desirable place for businesses.
2. GI and open space enable an attractive public realm with passive surveillance in a dense urban environment.
3. There is a potential conflict of GI impacting on the historic fabric of buildings. In addition, if not maintained may impact on protected viewing corridors and vistas.
4. Mitigate against effects of climate change – air quality, urban heat island, rainwater run-off and biodiversity enhancement. Improving open space provision and urban greening. Supporting text mentions multiple benefits could amend policy to say ‘which provides multiple environmental and social benefits – ecosystem services’.
5. GI and open will promote active transport through walking and cycling and help reduce the harmful emissions from transport.
6. Evidence demonstrates a positive correlation between GI/open space, good mental and physical health. Promoting well-being and opportunities for leisure
7. Potential to promote the positive impacts of GI and open space on climate change to both workers and students alike
8. Existing open space will be protected, particularly that of historic interest e.g. churchyards
9. Potential conflict of SINC's impacting on economic and business growth of areas of City e.g. 201 Bishopsgate Green Roof SINC

10. Increased opportunity for ASB, pickpocketing etc
11. Protection of open spaces but not specifically Historic Park and Gardens
12. Promotes climate resilient planting/climate mitigation insulation
13. Protects and enhances open space and biodiversity
14. Improved opportunities for leisure
15. Public access to open spaces provides equal opportunity for all
16. Protects historic interest
17. Includes civic open spaces which may not be green
18. May be more expensive developers' resistance
19. Uncertain what impact greening would have on historic buildings.
20. Residential amenity mentioned in text
21. Potential for diseases

Proposed Mitigation:

- Education – supporting text there is an opportunity to include educational promotion/interpretive boards e.g. food growing.
- Small area of soft landscaping – green walls, and Green gyms, small scale food growing. Open Space and CCS
- Water – add blue infrastructure
- Biodiversity - Multiple benefits – change to say environment and economic benefits. Eco Systems services
- Informal play. Open Space – supporting text
- Green Roofs – City greening more information on recreational spaces

Climate Resilience and Flood Risk

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Climate resilience and flood risk	↑ (1)	↑ (2)	N	↑↓ (7,8)	N	↑ (3,4)	↑ (5)	↑ (7)	↑ (6)	N	↑ (5)	↑ (5)	↑ (3)	N	N
DM	Overheating and urban heat island effect	↑ (1)	↑ (2)	N	N	N	↑ (3)	↑ (5)	↑	↑ (6)	N	↑ (5)	↑ (5)	↑ (3)	N	N
DM	Flood risk	↑ (1)	↑ (2)	↑	↑↓ (7,8)	N	↑ (3,4)	↑ (5)	N	N	N	↑ (5)	↑ (5)	N	N	N
DM	Sustainable drainage systems	↑ (1)	↑ (2)	N	↑↓ (7,8)	N	↑ (3,4)	↑ (5)	↑ (7)	↑ (6)	N	↑ (5)	↑ (5)	N	N	N
DM	Flood protection and flood defences	↑ (1)	↑↓ (7)	↑	↑↓ (7,8)	N	↑ (3,4)	↑ (5)	N	N	N	↑ (5)	↑ (5)	N	N	N

Comments:

1. Climate resilience will be key as other financial centres experience climate extremes
2. Resilience and flood measures will keep public realm and built environment safe and comfortable
3. Limiting overheating risk – good for air quality
4. SuDs Flood protection improves water quality – reduces sewer flooding

5. Reduce overheating and provides flood protection for built environment including housing and public realm
6. Green roofs SuDS improve biodiversity potential
7. Depends on design of climate resilience and flood defence measures especially on the Thames riverside and historic parks and gardens (Temples)
8. Protects heritage assets from flooding

Proposed Mitigation:

- Include reference to taking account of other historic assets not just archaeology in SuDS policy

Circular Economy & Waste

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Circular Economy & Waste (includes DtC)	↑↑ (1)	↑↑ (3, 6)	N	N	↑↑	↑↑ (3, 6)	↑↑ (4,6)	N	N	↑↑ (11, 14)	N	N	↑↑ (8)	N	N
DM	Zero Waste City (includes waste treatment & storage)	↑↓ (1, 2, 13)	↑ (3)	N	↑↓ (3, 7)	↑↑	↑↓ (3, 9)	↑↑ (4)	N	N	↑↑ (4,11)	↑ (12)	N	↑↓ (9, 12)	N	N
DM	Sustainable waste transport	↑↑ (1)	↑↑ (4, 5)	N	N	↑↑	↑↑ (4)	↑↑ (4)	N	N	↑↑ (5,4, 11)	↑ (4)	N	↑↑ (11)	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
DM	New waste management sites	↕	↗ (6)	N	N	↗	↗ (6)	↗ (6)	N	N	↗ (11)	N	N	N	N	N

Comments:

1. Waste and resources planning provides environment for responsible businesses to thrive
2. Space for waste reduces space for other uses but waste management on site or in the City eliminates need for transfer
3. Positive waste planning protects environment keeping open spaces, public realm and built / historic environment clear of unsightly waste
4. Positive impact on public realm and neighbouring housing/ commercial development from minimisation of waste transport and low emission vehicles – safer streets
5. Sustainable transport by river improves public realm within and beyond City
6. Ensures waste sites are built in suitable locations with appropriate environmental safeguards and carbon considerations
7. Potential impact on historic assets of incorporating waste storage within buildings
8. Waste apportionment and river transport reduces emissions associated with waste transport benefiting health
9. Could result in noise or air pollution if not sensitively managed
10. waste practices in open spaces could improve biodiversity
11. Effective waste planning will reduce road miles for waste with consequential positive impacts on air quality, road safety and health
12. Well designed waste storage improves residential amenity and impact of social and community facilities on surrounding environment
13. Short term cost but long term benefit as we move to green economy
14. Co operation with other waste planning authorities supports provision of waste facilities in suitable locations to deal with City's waste

Proposed Mitigation:

- Ensure that designs of waste management facilities, both on or off-site, occupy the minimum necessary footprint, are sited so that they do not cause noise disturbance to neighbouring uses. Environmental permits may be required to ensure suitable management of waste treatment facilities.
- Inclusion of supporting text reference to impacts on neighbouring occupants

Key Areas of Change Smithfield & Barbican

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Smithfield and Barbican KAOC	Improve the Smithfield and Barbican area.	↑↑ (1)	↑ (2)	↓ (3)	↑ (4)	↓ (5)	↓ (5)	↓ (5)	↑ (6)	↑ (6)	↑ (7)	↓ (8)	↓ (8)	↓ (8)	↑ (9)	↑ (10)
CS Culture Mile Implementation	Promote and protect the Culture Mile as a world-class destination.	↑↑ (1)	↑ (2)	↓ (3)	↑ (4)	↓ (5)	↓ (5)	↓ (5)	↑ (6)	↑ (6)	↑ (7)	↓ (8)	↓ (8)	↓ (8)	↑ (9)	↑ (10)
CS Culture Mile Impacts	Enhance and protect residents, occupiers, historic buildings and traffic and movement.	N	N	N	↑↑ (4)	N	N	N	N	N	↑↑ (7)	↑ (2)	N	N	N	N
CS Smithfield	Enhance the historic and mixed-use character.	↑ (1)	↑ (2)	↓ (3)	↑↑ (4)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Will result in economic growth.
2. Will improve buildings and spaces.
3. Improved area will attract more people and surveillance but may increase crime.
4. Heritage assets more likely to be protected to create a pleasant and interesting environment.
5. There will be an increase in waste with increased people visiting the area.
6. Increased greenery is planned to improve the area.
7. Improved vehicle and pedestrian flows are planned to improve the area.
8. Residents facilities may compete with cultural initiatives.
9. Educational activities are part of the proposals.
10. Equality of access and opportunity will result through targeted initiatives.

Proposed Mitigation:

- Crime is not addressed in the policy, but possible increased crime is addressed in Local Plan policies for the whole City.
- Waste management is not addressed in the policy, but waste management is addressed in Local Plan policies for the whole City.
- The protection of resident's facilities is dealt with in depth in Local Plan.

Liverpool Street

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Liverpool Street	The character and function of the Liverpool Street-Moorgate Key Area of Change as an enlarged transport hub, leisure and retail centre, catalyst for the developing creative ecosystem, and gateway to the Culture Mile and Tech City.	↑↑ (1)	↑ (2)	↑↓ (3)	N	↕ (4)	N	N	N	↑ (5)	↑↑ (6)	N	↑↑ (7)	↑ (6)	N	↑ (6)

Comments:

1. Increased development and the encouragement of flexible/ collaborative workspace will enable increased economic growth, retail sales and a further development of the creative eco-system.
2. Policy supports the increased permeability of the area, improved public realm and enhancements to street markets.
3. Policy seeks to increase the capacity on pavements, which will improve the safety of pedestrians. However, the increase in leisure activity could increase antisocial behaviour.

4. New development will bring greater footfall and potentially waste issues
5. Environmental enhancements provides opportunities for biodiversity and greening.
6. Increased walking routes will improve pedestrian movement, health opportunities and accessibility
7. Promotes access to the Culture Mile.

Proposed Mitigation:

- Work with licensing and City Police to mitigate potential problems of an enhanced retail/ leisure offer into the evenings and weekends.
- Single use plastics and greater awareness of the circular economy could mitigate some of the waste issues. The new waste contract would need to take account of the changes.

Eastern City Cluster

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS City Cluster	The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements	↑ (1)	↕ (2)	↑ (3)	↑ (4)	N	↕ (5)	N	↕ (2)	N	↕ (6)	N	N	N	↑ (7)	N

Comments:

1. Policy supports development of employment floorspace
2. Requirement for high quality design but increased levels of development added increased stress upon public realm and open spaces
3. Policy places great importance on safety improvements.
4. Policy looks place development where it has minimal impact on heritage assets.
5. New development can have impacts on local environment through wind, sunlight etc. Policy seeks to protect this as much as possible
6. Increased density leads to high levels of strain on roads and pavements. Policy looks to mitigate against this through prioritising pedestrian movement.
7. Improving access to education facilities is mentioned within the policy.

Thames Policy Area

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Thames Policy Area	The unique character of the City's riverside, and its functional uses for transport and recreation, will be enhanced	↑↑ (1)	↑ (2)	↓ (3)	↑↓ (4)	↑ (5)	↑↑ (6)	↓ (7)	↑ (2, 8)	↑ (2, 8)	↑↓ (9)	N	↑ (2, 8)	↑ (2, 8)	N	N

Comments:

1. The River Thames is a tourism and recreational asset. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth
2. Enhancing pedestrian permeability and accessibility and creating a high-quality new through the City Corporation's Riverside Walk Enhancement Strategy
3. Potential increase in people visiting the area but may result in increase in crime.
4. This area has many heritage assets which would enhance the area but some along the riverside may impact on development.
5. Retaining Walbrook Wharf for waterborne freight traffic, including waste use and freight consolidation. Encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste.
6. The proposals for the Thames Tideway Tunnel project would result in significant improvements to prevent raw sewerage from entering the Thames River.
7. Thames Tideway Tunnel would capture and divert storm overflows. Identifying pollution reduction measures at locations along the river but would be hard to alleviate due to current road layout
8. Blackfriars Bridge foreshore will include a civic space, green terraces, and a venue for outdoor events and public artwork. Protecting public access and river views along the riverside walk
9. Retaining Blackfriars Pier, and access to Tower Pier, and encouraging the

reinstatement of Swan Lane Pier and the use of these facilities for river transport. Improved vehicle and pedestrian flows are planned to improve the area but hard to alleviate pollution due to current road layout.

Proposed Mitigation:

- Crime is not addressed in the policy, but is covered in other Local Plan policies for the whole City.
- Add heritage assets to policy
- See Flood Risk Policy for further information.
- Housing – protect existing residential?

Blackfriars

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Blackfriars	The character and amenities of the Blackfriars Key Area of Change will be enhanced	↑↑ (1)	↑ (2)	↓ (3)	↑ (4)	↑↓ (5)	↑↑ (6)	↑ (7)	↑ (2, 9)	↑ (2, 9)	↑ (7)	N	↑ (2, 9)	N	N	N

Comments:

1. The substantial redevelopment of this area to provide new high-quality office and commercial accommodation would aid economic growth.
2. Enhancing pedestrian permeability and accessibility and creating a high-quality new public realm with urban greening.
3. Potential increase in people visiting the area but may result in increase in crime.
4. This area has many heritage assets which would be further enhanced by proposals.
5. Increase in waste due to more people in area but potential to use the nearby waste transfer station and river to transport waste on redevelopments along the riverside.
6. The proposals for the Thames Tideway Tunnel project at Blackfriars Bridge would result in significant improvements to prevent raw sewerage from entering the Thames River.
7. Thames Tideway Tunnel would capture and divert storm overflows. Identifying pollution reduction measures at locations along the river but would be hard to alleviate due to current road layout.
8. Improved vehicle and pedestrian flows are planned to improve the area
9. Blackfriars Bridge foreshore will include a civic space, green terraces, and a venue for outdoor events and public artwork.

Proposed Mitigation:

- Crime is not addressed in the policy, but is covered in other Local Plan policies for the whole City.
- See Thames Policy Area and Waste Management Policy for further information.

Pool of London

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and Inclusion
CS Pool of London	Area will be regenerated through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements	↑↑ (1)	↑ (2)	↑ (3)	↑ (4)	↑↓ (5)	↑ (6)	↑ (6)	↑ (2)	↑ (2)	↑↓ (7, 8)	↑ (9)	↑ (2)	N	↑ (10)	N

Comments:

1. The substantial redevelopment of this area to provide new high-quality office and commercial accommodation would aid economic growth.
 2. Enhancing pedestrian permeability and accessibility and creating a high-quality new public realm with active frontages and urban greening.
 3. Potential increase in people visiting the area but may result in increase in crime.
 4. This area has many heritage assets which would be further enhanced by proposals.
 5. Increase in waste due to more people in area but potential to use the nearby waste transfer station and river to transport waste on redevelopments along the riverside.
 6. Identifying pollution reduction measures at locations along the river but would be hard to alleviate due to current road layout
 7. Improved vehicle and pedestrian flows are planned to improve the area especially across Lower Thames Street
 8. Redevelopment and refurbishment offer the opportunity to revisit existing servicing
- Strategies
9. Retail and night-time uses may impact on existing residential facilities

10. There is potential to

provide interpretation of the historic development of the area etc. its relationship with the original site of London Bridge

Proposed Mitigation:

- Crime is not addressed in the policy but is covered in other Local Plan policies for the whole City.
- See Riverside Policy and Waste Management Policy for further information.

Aldgate & Tower

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Aldgate and Tower KAOC	-Promoting office-led development.	↑↑ (1)	↑ (2)	↓ (3)	↓ (3)	↓ (3)	↓ (3)	↓ (3)	↓ (3)	↓ (3)	N	↓ (3)	N	N	N	N
	-Supporting residents needs for training, employment, housing	↓ (4)	N	N	N	N	N	N	N	N	N	↑↑ (5)	↑ (5)	↑ (5)	↑ (5)	↑ (5)
	-Recognising visitor impacts and benefits	↑ (2)	↑ (2)	↓ (6)	↑ (7)	↓ (8)	↓ (8)	N	N	N	N	N	N	N	N	N
	-Improving transport connections and pedestrian connectivity	↑ (1)	N	N	N	N	N	N	N	N	↑ (9)	N	N	N	N	N

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	-Enhancing public realm.	↑ (1)	↑ (1)	↓ (10)	N	N	N	↑ (10)	↑ (10)	↑ (10)	N	N	N	N	N	↑ (11)

Comments:

1. Will result in economic growth.
2. Office/economic development improves the public realm through CIL payments and benefits from visitors.
3. Office-led development may not consider issues relevant to these land-use considerations.
4. May conflict with economic growth.
5. Will support resident's needs.
6. More visitors will increase surveillance but may increase crime.
7. More visitors will mean the historic environment is well maintained.
8. Increased visitor numbers may impact on waste and the environment.
9. Will ensure efficiency and effectiveness of transport and connectivity.
10. Improved public realm will incorporate safety, climate resilience, open space and greenery principles.
11. Enhanced public realm will mean greater use by a range of people and increased inclusion.

Proposed Mitigation:

- These issues are not addressed in the policy but are addressed in Local Plan policies for the whole of the Plan. (crime reduction, heritage assets, waste management, environmental protection, climate mitigation and resilience, open spaces and biodiversity).

Fleet Street

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS Fleet Street	The character and function of the Fleet Street Key Area of Change as a centre for judicial and related business, a key processional route and a Principal Shopping Centre will be promoted	↑ (1)	↑ (2)	↑ (3)	↑↓ (4)	N	N	N	↑ (3)	↑ (3)	↑↓ (5)	N	N	N	N	N

Comments:

1. Development of new court facilities will strengthen the legal cluster in the area.
2. Policy promotes improvements to the public realm along Fleet Street and open spaces in the area.
3. Policy seeks to increase the capacity on pavements on Fleet Street, which will improve the safety of pedestrians.
4. The historic nature of Fleet Street and the surrounding area is protected, however potential development in the conservation area may harm the heritage of the area.
5. Promotes improvements to pavements along Fleet Street which will improve pedestrian movement, this could have a negative effect on vehicular movement.

Proposed Mitigation:

Implementation

Planning Contributions and viability

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
CS	Seek appropriate planning contributions to mitigate the impact of development	↑ (1)	↑ (2)	↑ (3)	N	N	N	↑ (4)	N	N	↑↑ (5)	↑↑ (6)	N	N	↑↑ (7)	N
DM	Preparation of viability appraisals 8	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Enables provision of infrastructure to support the global business centre.
2. Provides funding to deliver public realm improvement
3. Provides funding to deliver security upgrades
4. Provides mechanism for carbon offsetting contributions
5. Provides for collection of Mayoral CIL and s106 to part fund Crossrail and Crossrail 2
6. Provides contributions for affordable housing from housing and commercial development including delivery of affordable housing outside of the City
7. Requires contributions towards skills, job brokerage, training and for local procurement to support residents and businesses outside of the City

8. Process policy sets out technical requirements for viability appraisals to support implementation of Policy CS

Proposed Mitigation:

- No specific mitigation. Office, Housing, Design and Healthy and Inclusive City policies provide detail on thresholds for planning obligations requirements and how obligations will be used to support Plan delivery.