

To whom it may concern

City of London Draft Local Plan IIA Audit Statement

Our reference

6824

Date

17 March 2021

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LUC has been engaged by the City of London Corporation to carry out an independent audit of the Integrated Impact Assessment (IIA) of the City of London's Local Plan review at appropriate stages during its preparation, to help ensure that the IIA complies with the relevant legal and statutory requirements and takes account of best practice guidance.

The IIA was undertaken by the City of London Corporation with LUC undertaking an independent audit to ensure that both the City Plan 2036 and IIA comply with the relevant legal and statutory requirements, whilst also taking into account best practice guidance. As a result of the COVID-19 pandemic, changes to the Use Classes Order, and an advisory visit from a Planning Inspector, final changes were made to the Proposed Submission version of the City Plan 2036. LUC provided direct help to the City Corporation to update the final version of the IIA to reflect these changes.

To date, LUC's audit work has included:

- reviewing and providing comments on the IIA Scoping Report, including the framework of objectives against which the Local Plan would be assessed;
- procedural advice on documenting the option development process and subjecting options to IIA, in particular to meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and case law;
- reviewing and providing comments on the IIA of the Draft Local Plan and the IIA of the Proposed Submission Local Plan that were prepared for consultation under Regulations 18 and 19 respectively of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Where we have provided suggestions on changes to the IIA, City of London Corporation has responded positively to these.

As a result of our audit work we confirm that, in our professional opinion, the IIA work to date has been carried out in accordance with the relevant legal and statutory requirements and takes account of best practice guidance. In order to fully meet these requirements, further IIA work will need to be carried out by City of London Corporation as the Local Plan progresses towards adoption. We will continue to advise on and audit the outputs of this ongoing IIA process and report on our findings at each stage of plan preparation.

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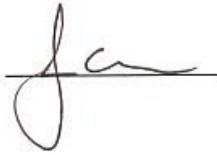
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Registered number 2549296
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Yours faithfully

A handwritten signature in black ink, appearing to read "J. Owen". It consists of a stylized 'J' on the left, followed by a loop and a horizontal stroke.

Jeremy Owen
Planning Director
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