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Integrated Impact Assessment commentary on City of London Transport Strategy Vision, Aims and Outcomes

Report to accompany consultation document dated 29 May 2018

Prepared by LUC
May 2018

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1 Introduction and approach

Introduction

- 1.1 The City of London has commissioned LUC to undertake the Integrated Impact Assessment (IIA) of its Transport Strategy and Local Implementation Plan (LIP). The City Corporation is currently consulting on the draft vision, aims and outcomes for the Transport Strategy and LIP and this document provides an IIA commentary on the draft vision, aims and outcomes as presented to the Planning and Transportation Committee on 29 May 2018.
- 1.2 IIA brings together Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) into a single assessment process based on the SA methodology.
- 1.3 SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.4 The requirement to undertake EqIA of plans was introduced in the Equality Act 2010, but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- 1.5 HIA is not a statutory requirement but can support decision-making by identifying possible impacts of a plan on the health of a community.
- 1.6 It should be noted that this is not a full IIA report designed to meet the reporting requirements of the SEA Regulations. Instead, it provides an overview of the likely effects of the vision, aims and outcomes in relation to a framework of sustainability, health and equality objectives that have been established and consulted on via a separate IIA Scoping Report (see below). This 'IIA commentary' has been produced to accompany consultation on the draft vision, aims and outcomes document to help inform stakeholder comments on the emerging Transport Strategy and LIP and its development from an early stage.
- 1.7 The City of London Transport Strategy will set the 25- year framework for future investment in, and management of, the Square Mile's streets and for improvements to transport connections. The City Corporation's Local Implementation Plan (LIP) will be developed alongside the Transport Strategy and will act as the delivery plan for its first three years. The Transport Strategy will include detailed proposals for achieving each outcome as outlined in the draft vision, aims and outcomes document, as well as targets and key performance indicators. These proposals will be finalised following the public consultation in June and July 2018 on the draft vision, aims and outcomes.

Approach to the IIA commentary

- 1.8 This document appraises the vision, aims and outcomes against the IIA objectives, with a score being attributed to each vision, aim and outcome to indicate its likely effect in relation to each IIA objective. This is followed by a short commentary explaining and justifying the scores given.
- 1.9 The use of IIA objectives is a recognised way in which the likely sustainability, health and equality effects of a plan can be described, analysed and compared. The vision, aims and outcomes have

been appraised against the IIA objectives that have been prepared in the scoping report for the IIA of the Transport Strategy and LIP. The IIA objectives are:

- 1 **Economic growth** - To sustain economic growth and employment opportunities locally, nationally and internationally maintaining the City's status as a leading international financial and business centre and to help enable the continuing success of its historic visitor attractions.
- 2 **Built environment and public realm** - To provide an attractive, efficient, accessible and digitally connected built environment and public realm for business, visitor, student and residential communities that respects and enhances local character and distinctiveness.
- 3 **Safe environment and crime reduction** - To reduce crime and antisocial behaviour and to manage and respond to the security challenges that the City faces.
- 4 **Heritage assets** - To conserve and enhance the significance of heritage assets and their settings enabling public appreciation and access wherever possible.
- 5 **Waste management** - To decouple waste generation from economic growth enabling a circular economy in the City that minimises waste arisings.
- 6 **Environmental protection (pollution)** - To maximise protection and enhancement of the natural environment.
- 7 **Climate change mitigation and resilience** - To mitigate climate change, assist in maintaining energy security and promote climate change resilience.
- 8 **Open spaces** - To increase provision and enhance the quality of open spaces enabling public access to them wherever possible.
- 9 **Biodiversity and urban greening** - To improve opportunities for biodiversity and increase the provision of natural environments.
- 10 **Social and cultural facilities** - To provide suitable social and cultural facilities for all the City's communities.
- 11 **Health** - To improve the health of the City's resident, worker and student populations.
- 12 **Education** - To enable excellence in education for all the City's communities.
- 13 **Equality and inclusion** - To enable social and economic inclusion in and around the City for workers, residents and visitors.

1.10 The following score based system will be used:

++	The vision, aim or outcome is likely to have a significant positive effect on the IIA objective(s).
+	The vision, aim or outcome is likely to have a minor positive effect on the IIA objective(s).
0	The vision, aim or outcome is likely to have a negligible or no effect on the IIA objective(s).
-	The vision, aim or outcome is likely to have a minor negative effect on the IIA objective(s).
--	The vision, aim or outcome is likely to have a significant negative effect on the IIA objective(s).
+/-	The vision, aim or outcome is likely to have a mixture of positive and negative effects on the IIA objective(s).
++/--	The vision, aim or outcome is likely to have a mixture of positive and negative effects with significant effects on the IIA objective(s).

1.11 Note that where a potential positive or negative effect is uncertain, a question mark is added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).

1.12 The likely effects of the Transport Strategy and LIP need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has

attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either '+' or '-' has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of a proposal on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

2 IIA commentary on vision, aims and outcomes

- 2.1 **Table 2.1** below presents the IIA scores for the draft vision, aims and outcomes for the City of London Transport Strategy, as presented to the Planning and Transportation Committee on 29 May 2018.

Vision

- 2.2 As shown in **Table 2.1** the vision: 'the Square Mile enjoys world-class connections and streets that inspire and delight' is expected to have significant positive effects in relation to objective 2. Built environment and public realm. The significant positive score for objective 2 reflects the direct relevance of the vision which seeks to achieve high levels of accessibility and a high quality built environment. Minor positive effects are expected in relation to the remaining objectives. Although these objectives are not explicitly addressed by the vision, the actions needed to achieve the vision are likely to result in indirect positive effects in all of these areas. Uncertainty has been added to six of the scores, in relation to objectives 4. Heritage assets, 5. Waste management, 6. Environmental protection, 7. Climate change mitigation and resilience, and 8. Open spaces. While it is likely that the vision will result in positive effects, the high level nature of the vision means it is unclear from the vision alone how this will be achieved. This will become apparent when the detailed proposals in the Strategy begin to get worked up and appraised.

Aims

- 2.3 Significant positive effects have been identified where the aim directly aligns with that of the IIA objective.
- 2.4 The first aim of the document is to 'ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit'. Therefore it has received significant positive effects in relation to objectives: 1. Economic growth, 2. Built environment and public realm, 3. Safe environment and crime reduction, 10. Social and cultural facilities, 11. Health, 12. Education, and 13. Equality and inclusion. Minor positive effects are expected for the remainder of the IIA objectives as, although there is no direct link, positive effects are expected as an indirect result.
- 2.5 The second aim is to 'support the development of the Square Mile as a vibrant global commercial centre and cultural destination'. Therefore it is expected to have significant positive effects on objectives: 1. Economic growth, 4. Heritage assets and 10. Social and cultural facilities. Minor positive effects are expected in relation to a further six objectives as, although there is no direct link, positive effects are expected as an indirect result. The aim is expected to have a negligible effect on four of the objectives.

Table 2.1: IIA scores for the vision, aims and outcomes

Vision, aims and outcomes		IIA Objectives												
		1. Economic growth	2. Built environment and public realm	3. Safe environment and crime reduction	4. Heritage assets	5. Waste management	6. Environmental protection	7. Climate change mitigation and resilience	8. Open spaces	9. Biodiversity and urban greening	10. Social and cultural facilities	11. Health	12. Education	13. Equality and inclusion
Vision	World-class connections and streets that inspire and delight	+	++	+	+	+	+	+	+	+	+	+	+	+
Aims	Accessible to all; easy, attractive & healthy place to work, live, learn & visit	++	++	++	+	+	+	+	+	+	++	++	++	++
	Vibrant global commercial centre and cultural destination	++	+	+	++	0	0	0	+	0	++	+	+	+
Outcomes	The Square Mile is a great place to walk and spend time	+	++	++	+	+	++	++	+	++	+	++	0	0
	Our streets are accessible to all	0	+	+	0	+	+	+	0	0	+	++	0	++
	People using our streets and public spaces are safe and feel safe	0	+	++	0	0	0	0	0	0	+	++	0	++
	People enjoy a relaxed cycling experience in the Square Mile	0	+	0	0	0	++	++	0	0	+	++	0	+
	The Square Mile is cleaner and quieter	0	+	0	+	0	++	++	0	0	0	++	0	0
	Delivery and servicing needs are met in ways that benefit the Square Mile	++	+	0	0	++	++	++	0	+	+	+	0	+
	Street space is used more fairly and effectively	++	++	+	0	+	+	+	+	0	0	+	0	+
	Our street network is resilient to changing circumstances	++	+	++	0	+	++	++	+	++	+	++	0	+
	The Square Mile benefits from better transport connections	++	+	0	0	+	++	++	0	0	++	++	++	++
	Emerging transport technologies benefit the Square Mile	++	+	+	+	+	++	++	0	0	+	+	0	++

Outcomes

- 2.6 For the outcomes, as for the aims, significant positive effects are identified where the outcome directly aligns with the aims of the IIA objective. Reference has been made both to the headline outcome, for example 'The Square Mile is a great place to walk and spend time' and the subsidiary requirements for meeting each outcome, for example 'The experience of walking and spending time on our streets will be improved through investment in high quality public realm, street greening and motor traffic reduction'.

Outcome: The Square Mile is a great place to walk and spend time

- 2.7 The first outcome 'the Square Mile is a great place to walk and spend time' is expected to have significant positive effects on objectives:
- 2. Built environment and public realm, because it requires the City's streets and public spaces to be great places to walk and spend time, which will be achieved through investment in high quality public realm, street cleaning and motor traffic reduction.
 - 3. Safe environment and crime reduction, because the outcome requires people to view the streets in the City as great places to walk and spend time in comfort and safety.
 - 6. Environmental protection because, the outcome requires motor traffic reduction and street greening.
 - 7. Climate change mitigation and resilience because, as above, the outcome requires motor traffic reduction and street greening.
 - 9. Biodiversity and urban greening because the outcome requires street greening.
 - 11. Health because, the outcome prioritises the needs of people moving around the City on foot and will result in people walking having their needs prioritised and requires street greening and motor traffic reduction.

Outcome: Our streets are accessible to all

- 2.8 The second outcome 'our streets are accessible to all' is expected to have significant positive effects on the following objectives:
- 11. Health because the outcome requires the removal of barriers to walking and cycling and the ability of people of all ages and abilities to travel around the Square Mile with ease.
 - 13. Equality and inclusion because the outcome is the streets being accessible to all, requiring people of all ages and abilities to be able to travel easily around the Square Mile.

Outcome: People using our streets and public spaces are safe and feel safe

- 2.9 The third outcome 'people using our streets and public spaces are safe and feel safe' is anticipated to have significant positive effects on objectives:
- 3. Safe environment and crime reduction as the outcome requires proportionate security measures to be incorporated into buildings and the streetscape, as well as a reduction in road danger.
 - 11. Health because road danger will be reduced and traffic related death and serious injury will be eliminated.
 - 13. Equality and inclusion because the outcome requires everyone to feel safe while travelling around the square mile and security measures which will be incorporated into buildings and the streetscape.

Outcome: People enjoy a relaxed cycling experience in the Square mile

- 2.10 The fourth outcome 'people enjoy a relaxed cycling experience in the Square Mile' is likely to have significant positive effects on the following objectives:

- 6. Environmental protection as the requirement to make cycling a relaxing and enjoyable way to travel and the aim to enable a more diverse range of people to choose to cycle will result in lower motor vehicle use and pollution.
- 7. Climate change mitigation and resilience because, as above the increased use of bicycles will result in lower carbon emissions associated with motorised transport.
- 11. Health because designing and managing streets to enable cycling to be a relaxing and enjoyable way to travel will encourage more people to use this active form of transport and contribute to fewer injuries on City streets.

Outcome: The Square Mile is cleaner and quieter

2.11 The fifth outcome 'the Square Mile is cleaner and quieter' is envisaged to have significant positive effects on objectives:

- 6. Environmental protection as the outcome requires carbon emissions and people's exposure to air and noise pollution to be reduced and fewer motor vehicles with those than remain being smaller, lighter and zero emissions.
- 7. Climate change mitigation and resilience because the outcome requires a reduction in carbon emission and fewer and lower emission motor vehicles.
- 11. Health because the outcome requires a reduction in people's exposure to air and noise pollution.

Outcome: Delivery and servicing needs are met in ways that benefit the Square Mile

2.12 The sixth outcome 'delivery and servicing needs are met in ways that benefit the Square Mile' is expected to have significant positive effects on objectives:

- 1. Economic growth because the outcome supports future development and growth by changing the ways goods are moved around the City, and also requires the transport, delivery and servicing requirements of businesses to be met in ways which maximise economic benefits.
- 5. Waste management as the outcome will result in the servicing requirements of businesses and residents being met in ways that maximise social, economic and environmental benefits.
- 6. Environmental protection because the transport, delivery and servicing requirements of businesses and residents will be met in ways that maximise environmental benefits.
- 7. Climate change mitigation and resilience because, as above delivery and servicing requirements will be met in ways which maximise environmental benefits.

Outcome: Street space is used more fairly and effectively

2.13 The seventh outcome 'street space is used more fairly and effectively' is expected to have significant positive effects on the following objectives:

- 1. Economic growth because the use of streets will be better matched to the priorities of businesses and the street space will be used more flexibly due to changing priorities throughout the day and seasonally.
- 2. Built environment and public realm as the use of the streets will be better matched to the priorities of people and street space will be used more flexibly.

Outcome: Our street network is resilient to changing circumstances

2.14 The eighth outcome 'our street network is resilient to changing circumstances' is likely to have significant positive effects on objectives:

- 1. Economic growth because the impact of planned and unplanned disruption on the movement of goods and people will be minimised.
- 3. Safe environment and crime reduction as emergency services will be able to respond rapidly to incidents.

- 6. Environmental protection as the outcome requires sustainable drainage and greenery on the streets.
- 7. Climate change mitigation and resilience because, as above the outcome requires the City to be ready for a changing climate and extreme weather events by incorporating sustainable drainage, greenery, shade and shelter into streets.
- 9. Biodiversity and urban greening as greenery, shade and shelter will be incorporated into streets.
- 11. Health as emergency services will be able to respond rapidly to incidents.

Outcome: The Square Mile benefits from better transport connections

2.15 The ninth outcome 'the Square Mile benefits from better transport connections' is anticipated to have significant positive effects on objectives:

- 1. Economic growth, as the outcome requires businesses and workers to benefit from improved local, national and international connections.
- 6. Environmental pollution because the outcome requires improvements to walking, cycling and public transport which could then reduce motorised transport in the city and subsequently air and noise pollution.
- 7. Climate change mitigation and resilience because, as above the outcome requires improvements to walking, cycling and public transport which, through reducing motorised transport will reduce carbon emissions.
- 10. Social and cultural facilities, as the outcome requires residents, learners and visitors to benefit from improved local, national and international connections.
- 11. Health as the outcome requires improvements to walking and cycling.
- 12. Education as the outcome requires learners to benefit from improved local, national and international connections.
- 13. Equality and inclusion as residents and visitors to the City will benefit from improved connections, in particular improvements to walking, cycling and public transport.

Outcome: Emerging transport technologies benefit from the Square Mile

2.16 The tenth outcome 'emerging transport technologies benefit from the Square Mile' is expected to have significant positive effects on objectives:

- 1. Economic growth because the outcome requires businesses to feel that the City has benefitted from emerging transport technologies and services.
- 6. Environmental pollution as automated vehicles and other new transport technologies and services will work for the City and will support efforts to reduce motor traffic, thus decreasing air pollution.
- 7. Climate change mitigation and resilience because as above new transport technologies will support efforts to reduce motor traffic therefore decreasing carbon emissions.
- 13. Equality and inclusion because the transport technologies and services will help to deliver inclusive, safe, attractive and vibrant streets.

2.17 All of the outcomes are likely to result in minor positive effects for many of the IIA objectives as, although they do not have a direct link to the aims of the IIA objectives, positive effects are expected as an indirect result.

2.18 Those minor positive effects that also have a question mark have been given this score because the high level nature of the outcome means it is unclear from the outcome alone how this will be achieved.

Effects of the Consultation document as a whole

- 2.19 The document as a whole is expected to have positive effects on all of the IIA objectives. More than half of the aims and outcomes are expected to have significant positive effects on the following objectives:
- 1. Economic growth.
 - 6. Environmental protection.
 - 7. Climate change mitigation and resilience.
 - 11. Health.
- 2.20 Significant positive effects are expected in relation to objective 1 as the document intends to improve the accessibility, connectivity, servicing and technology in / of the City, thus attracting new businesses and workers. Objectives 6 and 7 are likely to receive significant positive effects as a result of the documents focus on reducing motorised transport in the City, improving the walking and cycling environment and accessibility to public transport and improvements in urban greening and climate change resilience. Significant positive effects are anticipated for objective 11 due to the focus of the document on improving accessibility, improving the walking and cycling environment, making the City safer and more inclusive and reducing motorised transport.
- 2.21 The remainder of the objectives received a mixture of significant positive scores, with minor positive effects and negligible effects. No significant adverse effects have been identified at this stage.

Recommendations

- 2.22 While the vision, and a number of aims and outcomes are expected to have minor positive effects on objectives 4. Heritage assets and 8. Open spaces, these objectives are not expected to result in many significant positive effects from the vision, aims and outcomes as they are currently. It is therefore recommended that where relevant additional sub points are added to the outcomes that will work to further protect and enhance heritage assets and open spaces.
- 2.23 For example, in regards to heritage assets it is considered that a point could be added to the first outcome 'The Square Mile is a great place to walk and spend time' that highlights how a high quality public realm will enhance heritage assets and improve accessibility to historic attractions.
- 2.24 In regards to open spaces a point could be added to the first outcome 'The Square Mile is a great place to walk and spend time', the fifth outcome 'The Square Mile is cleaner and quieter' or the eighth outcome 'Our street network is resilient to changing circumstances' that protects and enhances open spaces, improves accessibility to open space and highlights their importance in regards to an attractive and inclusive public realm, climate change adaption and public health.

3 Next steps

- 3.1 As stated in Chapter 1, the City of London Transport Strategy will set out the 25-year framework for future investment in, and management of, the Square Mile's Streets and improvements to transport connections. The Local Implementation Plan (LIP) will act as the delivery plan for the Strategy. This IIA commentary accompanies the draft vision, aims and outcomes for the Transport Strategy which are currently being consulted upon with the City's businesses, workers, residents and other interested parties. Once consultation is complete, in July 2018, the detailed proposals to be included in the draft Transport Strategy for achieving each outcome will be drafted.
- 3.2 Once the draft Transport Strategy and LIP have been prepared they, and any reasonable alternatives, will be subject to the later stages of the IIA process using the IIA framework presented in the Scoping Report. A full IIA report (incorporating the later stages of the IIA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Transport Strategy and LIP. Consultation will take place in November and December 2018, in order for the final version of the LIP to be submitted to TfL in February 2019, and for the final Transport Strategy to be published in March 2019.

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