

City of London

# **Sustainability Appraisal**

## **Appendix 2: Baseline Information**

Local Plan Review  
Environmental Report  
City Plan 2040 Revised Proposed Submission

January 2024



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## 1. Introduction

- 1.1. The baseline information in this appendix covers significant effects and issues identified in Schedule 2 of the SEA Regulations: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. Baseline information is reported with references to the city's monitoring and information reports where appropriate.

### **COVID-19 pandemic**

- 1.2 On 11 March 2020, the World Health Organisation declared the coronavirus, known as COVID-19, a global pandemic.
- 1.3 The global pandemic has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people's health and wellbeing, and economically.
- 1.4 The effects of the pandemic in the medium to long-term, and particularly over the full extent of the City Plan 2040 plan period, are unknown. In the short-term, the impacts were profound and unprecedented for at least a century. Apart from the impacts on death rates and people's health (particularly older members of the community, those with pre-existing conditions, and certain sectors of the population), the impacts on sectors of the economy and City centre locations, in particular, were substantial.
- 1.5 From a planning perspective, the pandemic has brought to light the importance of healthy living and working environments, access to nature and outdoor space, the ability to exercise, and the impact of noise and pollution. It has driven a number of changes to people's work and home lives. For the City of London, these changes included a short term shift to remote working for the majority of the City's office-based businesses, reductions in journeys to the City and footfall within the Square Mile.. As the UK has recovered from the pandemic, some of these short-term impacts have eased, with increased public transport usage and a return to pre-pandemic places of work, albeit that numbers have yet to return to pre-pandemic levels.
- 1.6 On 5 May 2023, the World Health Organisation declared that COVID-19 no longer represented a "global health emergency" and is now an established and ongoing health issue.<sup>i</sup>

### **Levelling Up and Regeneration Bill**

- 1.7 On 14 May 2022, the Government published the Levelling Up and Regeneration Bill<sup>ii</sup>, which sets out in detail the Government's proposals for reforming the planning system. It sets out the Government's plans to drive local growth and empower local leaders to regenerate their areas. The Bill proposes a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, and proposes the

replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation.

## 2. Biodiversity, flora and fauna

### Context and baseline – biodiversity

- 2.1. Biodiversity in the City is constrained by a number of factors, such as high density buildings and built infrastructure, the small size and isolated nature of open spaces and pressure on open spaces from high numbers of workers. Nonetheless, a series of habitats and species have been identified in the City's Biodiversity Action Plan (BAP) 2021-2026 as being important to the City and plans have been put in place for their protection. This BAP is currently under review.
- 2.2. The BAP provides a strategic focus for decision makers and covers the open spaces, habitats and species in the City of London, in addition to Bunhill Fields Burial Ground in the London Borough of Islington. It provides a framework to fulfil all legislative requirements relating to the management of green spaces and identifies and prioritises actions for biodiversity at a local level.
- 2.3. The BAP will be delivered under the following themes: (1) Open space and habitat management (protect and enhance habitats and species); (2) The built environment (improve green infrastructure); (3) Education and community engagement (promote a greater understanding of the City's biodiversity); and (4) Data collection, surveys and monitoring (improve monitoring and data).
- 2.4. The City's BAP target species are as follows:
  - Black Redstart – With fewer than 100 pairs nesting in Britain, the Black Redstart features on the amber list of birds of conservation concern. Central London and specifically the City of London are an extremely important location for this species. The increase in the number of green roofs in the City is likely to be the key to continued success of this species in the Square Mile.
  - Peregrine Falcon – Peregrine Falcons have been present in the City for a number of years and are legally protected under Schedule 1 of the Wildlife and Countryside Act 1981. Around 20% of the European peregrine population breeds in the UK and therefore it is important to protect this species. The Peregrine Falcon's natural habitat is cliff ledges and therefore they are attracted to the City's tall buildings which mimic this habitat.
  - Swift – The Swift is a medium sized bird which is an excellent flyer but unfortunately their breeding numbers in the UK have declined by over 55% since 1995. They are summer visitors to London that arrive in April and leave in August, and migrate to Africa in winter. Swifts have adapted to make the urban

landscape their home, favouring the eaves and roof space of buildings. Building management guidelines should include retrofitting of Swift nesting boxes in refurbished and new developments to prevent the decline in breeding numbers.

- House Sparrow – Once among the most common birds in England, their numbers peaked at over 12 million pairs in the 1970s but this species has seen a massive decline of around 70% in London in the last 25 years. Because of this rapid decline the sparrow is now on the red list of species of high conservation concern. Their decline is linked to availability of food, air pollution and loss of habitat and nesting sites. Refurbishments and new developments should include the provision of nest boxes, planting seed rich species, and establishing more areas of dense shrub cover.
- Bats – There are 17 species of bats in the UK with the common pipistrelle, *Pipistrellus*, being the most common species in inner London. They forage over water and use tree lines to aid navigation and are regularly seen in the City over the Barbican lakes and gardens. Further surveying and monitoring are required to establish their distribution in the Square Mile. It is important that suitable feeding sites are protected, and that artificial lighting does not disrupt their flight paths. Habitat enhancements for bats can include night-scented planting and the provision of bat boxes or bat bricks incorporated into refurbished and new developments.
- Bumblebees – There are 24 species of bumblebee in the UK but only eight of these are common and they live in colonies of up to 200 workers. Queens hibernate underground during the winter, emerging in spring to find suitable nest sites. They are important pollinators of many plants and fruiting trees. Urban areas can provide a diverse range of flowering plants which extend the season and availability of pollen and nectar. The decline of bumblebees is linked to a reduction in wildflower-rich meadows and an increase in landscape management practices.
- Stag Beetles – Although there are as yet no recorded stag beetles in the City, efforts are being made to create suitable habitat to attract this species. The Stag Beetle is the UK's largest ground living beetle and is a nationally threatened species. The population decline is related to habitat loss due to development and landscape management practices which remove dead and rotting material.

2.5. The objectives in the previous BAP (2016-2020) focused on the following habitats: firstly urban greenspaces, churchyards and cemeteries; secondly built structures; and thirdly the Tidal Thames. The newer BAP (2021-2026) provides specific action plans for some species such as the Black Redstart, in addition to 'priority habitats' identified by the London Biodiversity Partnership much like the previous BAP. A further habitat recognised as a London biodiversity target within the City of London is the Tidal Thames, which is also the City's only Site of Metropolitan Importance for Nature Conservation (SMINC).

2.6. The distribution of open spaces with trees and soft landscaping for biodiversity in the City are shown in Figure 1. The projected roof space types in the City of London between 2020/21 and 2025/26 are shown in Figure 2, and Figure 3 shows open space completions in the City between 2011/12 and 2020/21.

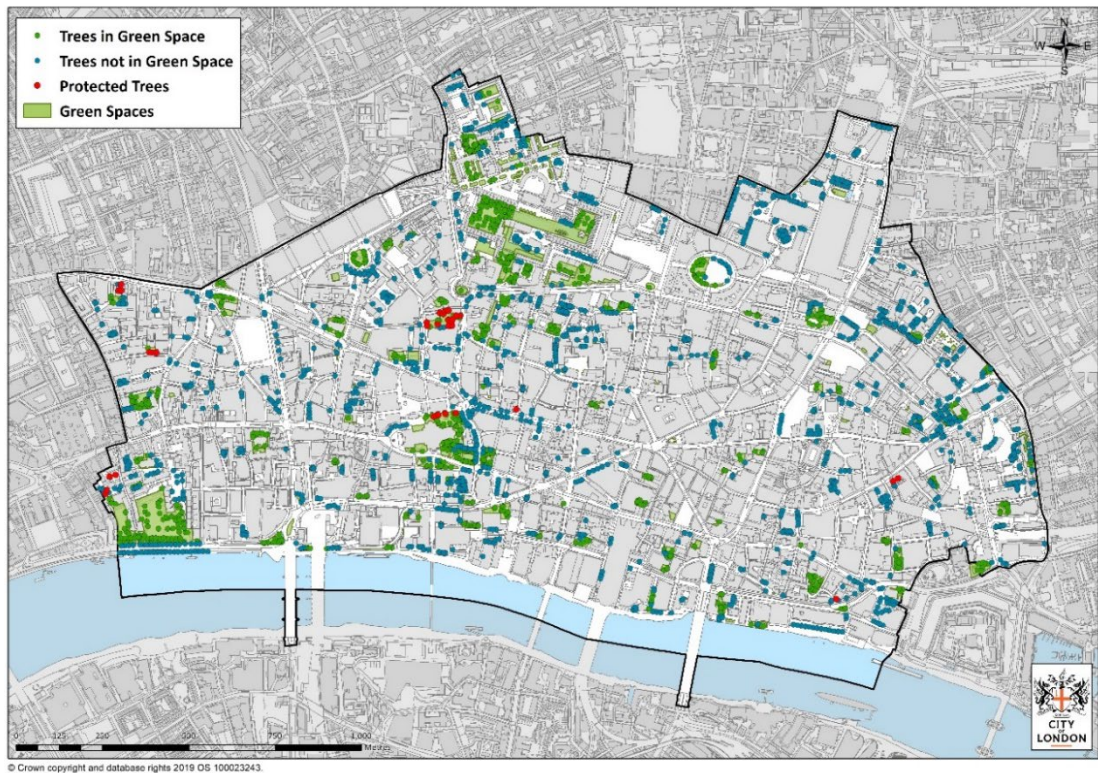


Figure 1: Trees and soft landscaping in the City of London

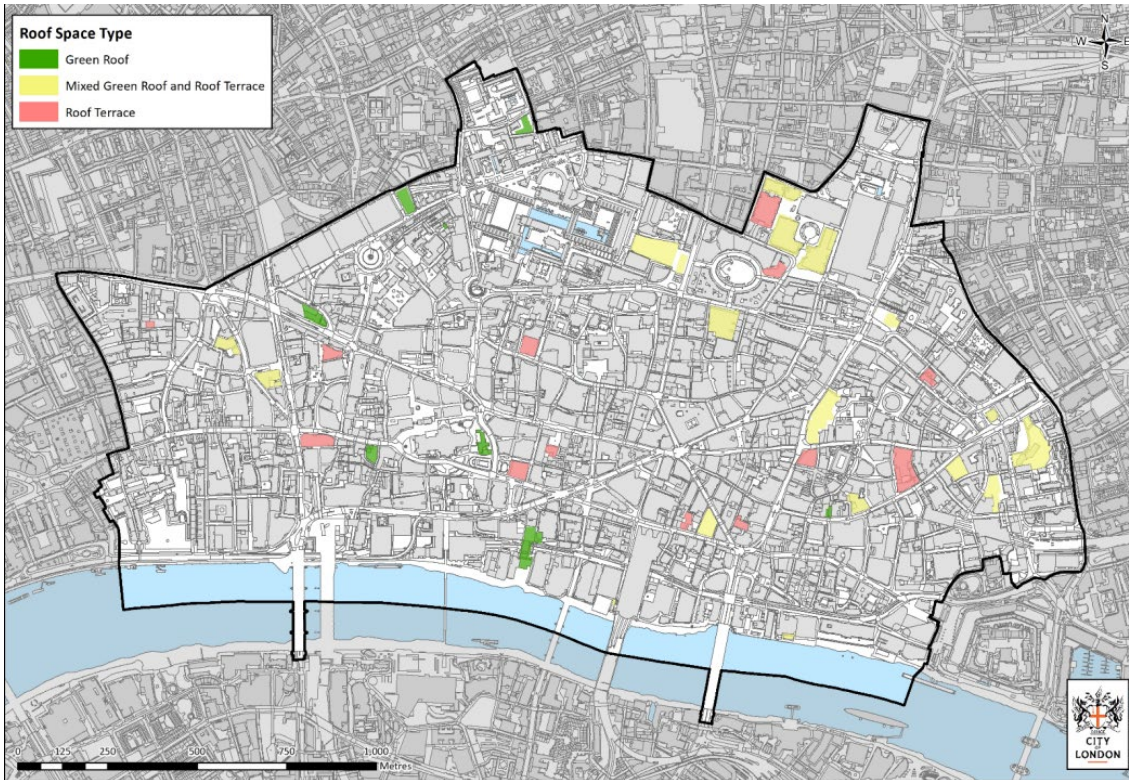


Figure 2: Projected Roof Space Types in the City of London (2020/21 to 2025/26)

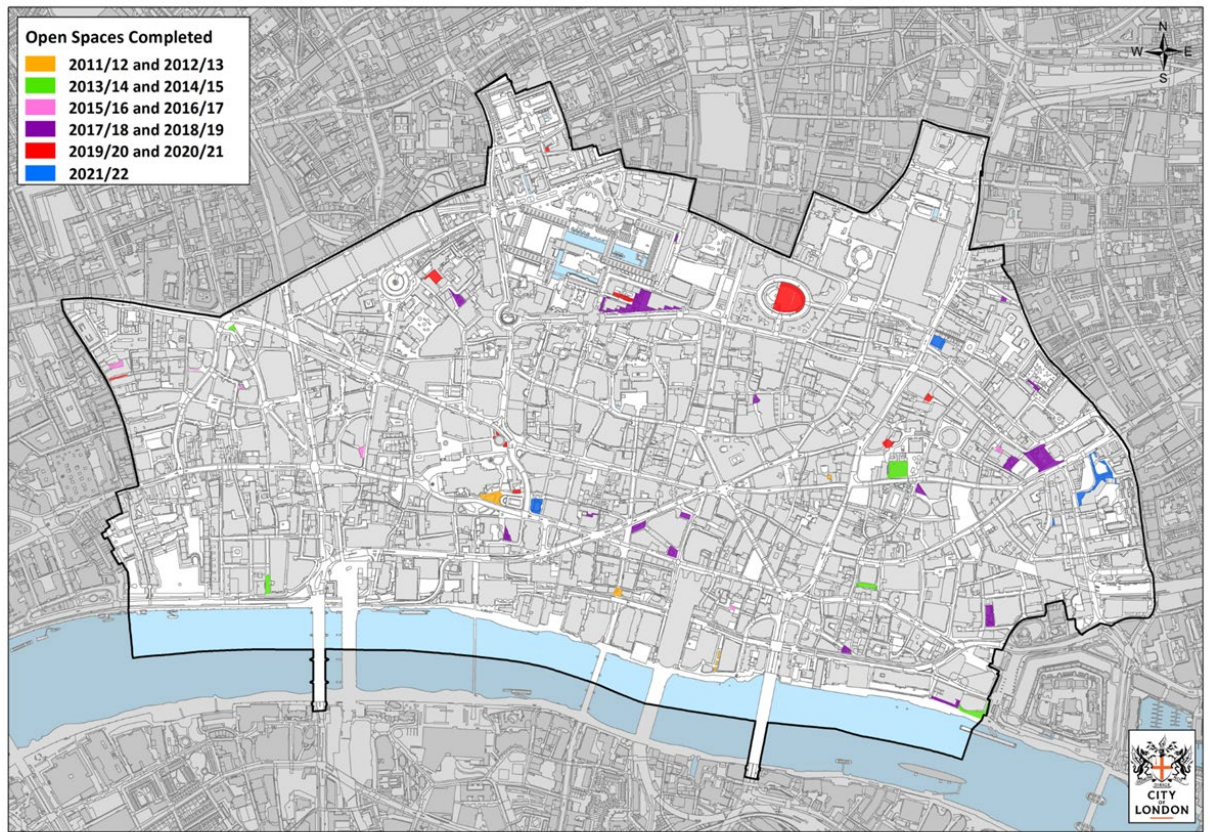


Figure 3: Open Space Completions by Year in the City of London (2011/12 to 2021/22)

## Progress against previous SA objective - biodiversity:

Objective: To maintain and enhance biodiversity

- There has been a net gain in open space, the total of which has seen an increase from 32.13 ha in 2011/12 to 34.55 ha in 2021/22. New open space provision in the City of London has included the replacement of open space lost due to redevelopment works, and city public realm projects, providing open space on underused street space.
- In parallel with this there has been a large increase in green roof provision associated with development. Schemes completed between 2011/12 and 2021/22 saw a significant increase in extensive green roofs in the City of London from 23 to 74, with an increase in the green roof area from 8,200m<sup>2</sup> (0.82 ha) to 33,700m<sup>2</sup> (3.37 ha). There was a smaller increase in sites with intensive green roofs, from 16 to 34 across the same period, which equates to an increase in the green roof area from 13,900m<sup>2</sup> to 21,000m<sup>2</sup>. Sites comprising a mixture of extensive and intensive green coverage increased from 4 to 16, with an increase in green roof area from 4,000m<sup>2</sup> to 10,700m<sup>2</sup>.
- As at 31 March 2022, the City of London contained 10 Sites of Importance for Nature Conservation (SINCs). This includes Finsbury Circus Gardens, where the gardens were reopened during 2020/21 upon completion of works relating to the Elizabeth Line (Crossrail). Upon adoption of the emerging City Plan 2040, the City of London is projected to have 13 SINCs. Projected new SINCs are: (1) Postman's Park; (2) Portsoken Street Garden; and (3) St. Dunstan in the East Church Garden.
- The Friends of City Gardens have produced several Bird Surveys of the City of London and one produced in 2016 concluded that there is a healthy population of Black Redstarts and species such as the House Sparrow, Peregrine Falcon, Herring Gull, Black Headed Gull and Grey Wagtail – all of which are breeding in the Square Mile. There has also been a sighting in the City of a pair of Long-tailed Tits. However, the number of Goldfinches has declined and there has been a lack of sightings of Greenfinches.
- 2019 was the second year of systematic observations of bats in the City of London using static recorders. The results show that there is a widespread population of Common pipistrelle (*Pipistrellus pipistrellus*) that is present throughout the year. The results confirm that these bats not only forage and breed in the City during summer months but also hibernate here in winter. The data also suggests that other bat species may be present, namely Nathusius' pipistrelle (*Pipistrellus nathusii*) and Soprano pipistrelle (*Pipistrellus pygmaeus*). However, since it is difficult to distinguish the calls of these three species from sonograms, only observations of Common pipistrelle are recorded.
- Data on stag beetles is not currently available.



## Commentary

The Local Plan policy of protecting existing open spaces, encouraging green roofs and promoting planting for biodiversity and climate resilience has contributed to some positive impacts on biodiversity. However, it may be necessary to target measures to promote awareness of the City's target species and bird populations which are declining.

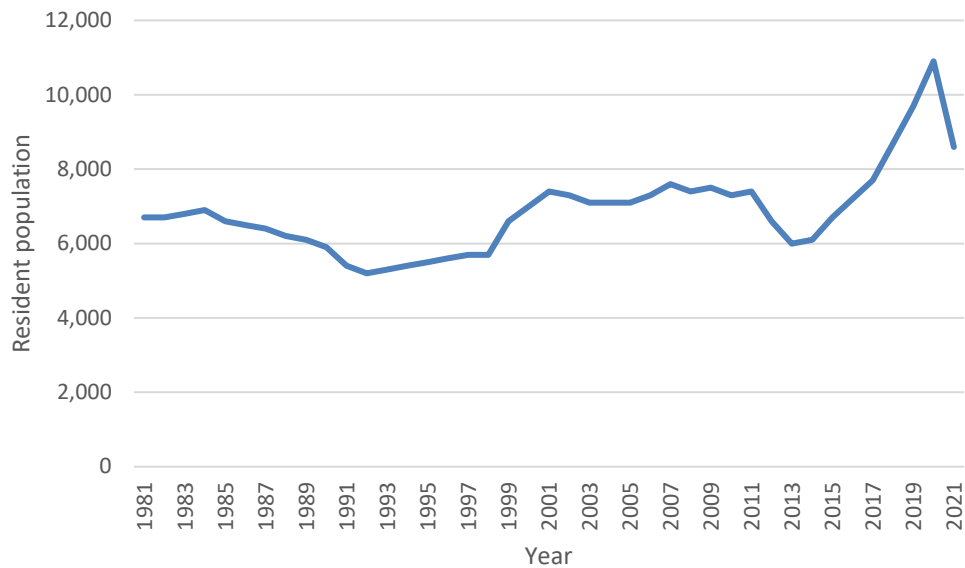
## Likely evolution without a Local Plan Review

As pipeline development is completed some areas of open space and green roofs and walls should increase. This will bring positive benefits for biodiversity although this may not automatically assist the City's target species without further intervention. Further intensification of development will mean more people working in the City and increased pressure on existing open spaces as places for leisure and quiet time which could impact on biodiversity. However, there are opportunities for new developments to create open spaces at ground and elevated levels, and to create green roofs, green walls and roof terraces. The completion of the Thames Tideway Tunnel in 2025 will have positive impacts on river species due to reduced river pollution from sewer outflows.

## 3. Population and human health

### Context and baseline – residential population

- 3.1. The City as the central business district for London has a low resident population and a large daytime population, most of whom commute to the City from elsewhere in London and beyond. This section will therefore consider both the resident population and the daytime population of workers. Census data used in this section is taken from 2021.
- 3.2. The residential population of the City of London as defined by the 2021 Census is 8,600. In estimating and projecting population in the City, a factor which provides a high level of uncertainty is the 1,713 persons who at the time of the 2021 Census, were residents in the UK and had a second home in the City. 1,714 of the 7,636 homes in the City are second homes (around 22.5%). This is an increase of 22.3% from 2011 to 2021, compared to the resident population increasing by 16.2% within the same time span. This demonstrates the trend towards second homes and investment properties in the City as well as population increase in the City of London<sup>iii</sup>. In producing estimates and projections for future years it is difficult to assess whether there will be changes in the proportion of persons who are permanent residents or those who have a second home in the City.



**Figure 4: City of London residential population 1981-2021**

- 3.3. In terms of the long-term trend, the population of the City decreased rapidly between the 1871 and 1921 Census counts, as the commercial base of the City expanded and residents were displaced to surrounding areas. This decline continued, but at a slower pace, until 1991 when the population was approximately 4,000. Following boundary changes in 1994, including the addition of the Mansell Street area and the Golden Lane Estate to the City, this figure was amended to about 5,400. The rise in population to 7,185 in 2001 represented the first increase in the residential population of the City since the Census began and the 2011 census confirmed a slight upward trend in City resident numbers to about 7,400. The increase in the population of City of London to 8,600 in 2021 further confirms an upward trend in population, with a 16.2% increase displayed in ten years. This is higher than the overall increase in England (6.6%) and Greater London (7.7%). In 2021, the City of London ranked 308th for total population out of 309 local authority areas in England, maintaining the same position it held a decade ago.
- 3.4. Population projections can be derived from two different sources alongside the 2021 Census. Trend based projections are provided in the ONS Sub-National Projections. Alternatively, the GLA publishes housing-led (SHLAA-based) population projections which model population growth within the context of housing supply constraints set out in the SHLAA.
- 3.5. The ONS Mid-Year Estimates and Sub-National Projections are primarily a trend-based data profile utilising a range of births, deaths and internal and international migration data. An initial series of Mid-Year Estimates between 2011 and 2021 found there to be significant growth in the City of London resident population. Revised estimates incorporated a change of methodology applied to the international migration component, which is difficult to estimate as the UK has no population register. The revised estimates for the City showed a significant net outward

international migration in 2012 and 2013 before a net inward international migration for the years 2014 to 2016. This revised the population estimates to a significantly lower level than the original estimates, with a further revision in 2019 changing the way that 0-1 age groups are estimated. The Sub-National Projections project a steady increase in population from 8,706 in 2018 to 9,886 in 2026.

- 3.6. Estimating and projecting the resident population is subject to a range of factors. Consideration of migration data and use of housing as second homes and short term lets make it difficult to develop a national or regional methodology that produces a set of accurate estimates and projections for the City. The GLA 2019 housing-led (SHLAA-based) projections incorporate the profile of new housing to be delivered in the City and thus reflect the most likely level of resident population. The level of population is projected to increase to 9,705 in 2026, 9,774 in 2031 and 10,092 in 2036.

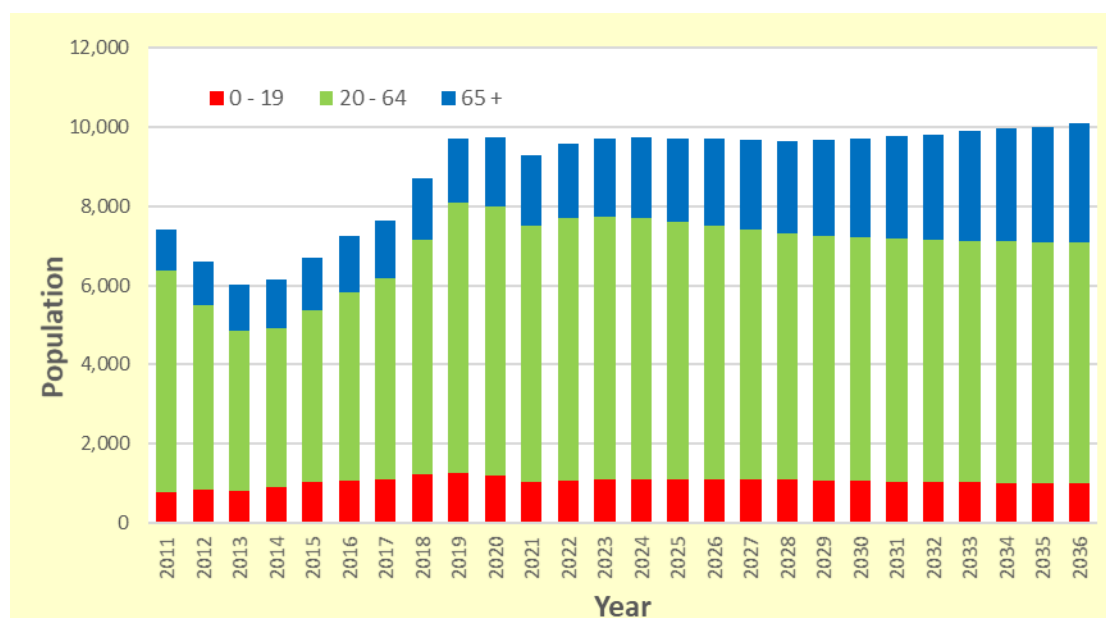


Figure 5: City of London demographic projections by age band 2011-2036 (source: GLA)

- 3.7. In assessing the age profile:
- There is projected to be an increase in Age Band 0-19 from 779 in 2011 to 1,102 in 2026, before falling to 981 in 2036. Given that developments in the housing pipeline are predominantly flats with a small number of rooms, it is difficult to assess whether this will materialise in practice. This represents a 26% increase in this age band between 2011 and 2036.
  - The Age Band 20-64 is projected to increase from 5,582 in 2011 to 6,116 in 2036. This is an increase of 10%. This age band will also be the main occupier of Second Homes or Short Term lets.
  - The Age Band 65+ is projected to increase significantly from 1,051 in 2011 to 2,995 in 2036. This is an increase of 185%. This is largely due to the ageing of the

population profile in the main residential locations of the Barbican and Golden Lane but is based on the assumption that a high proportion of older residents will remain in their current accommodation.

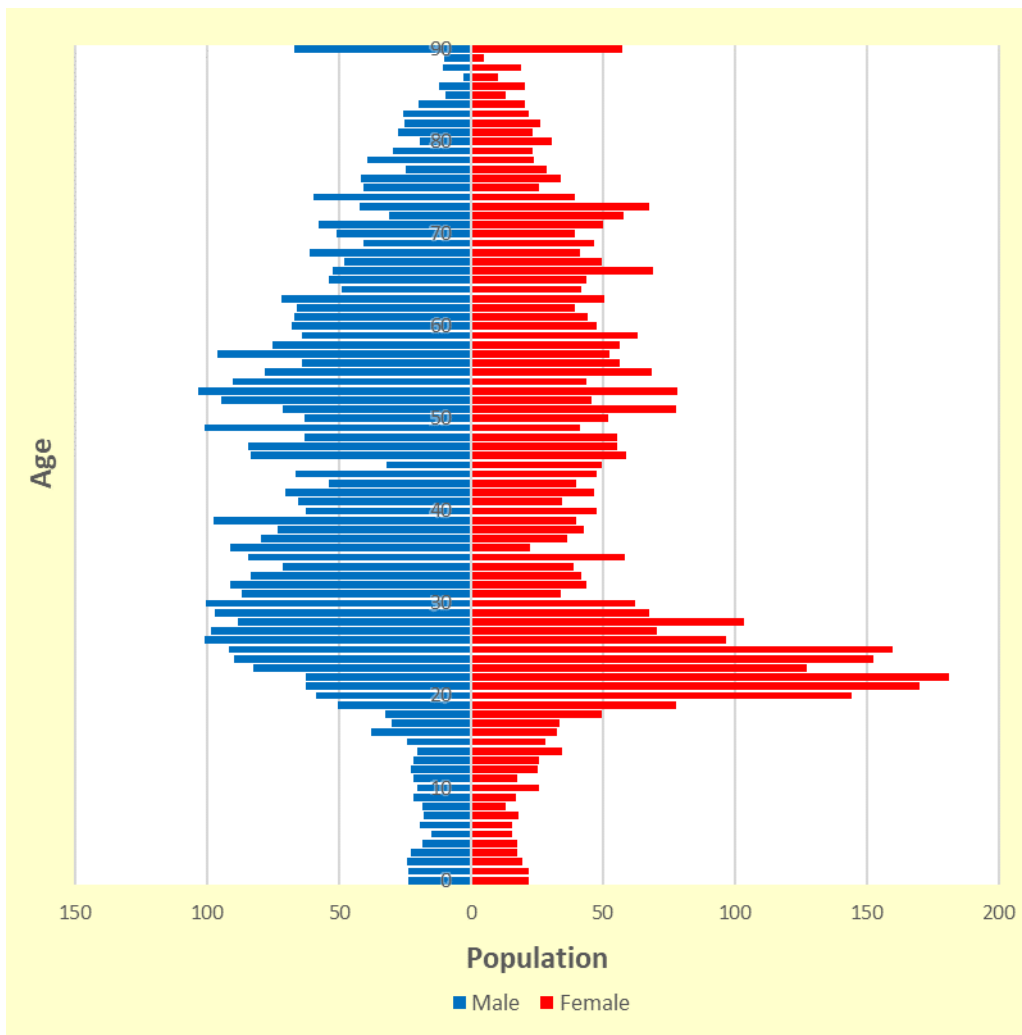
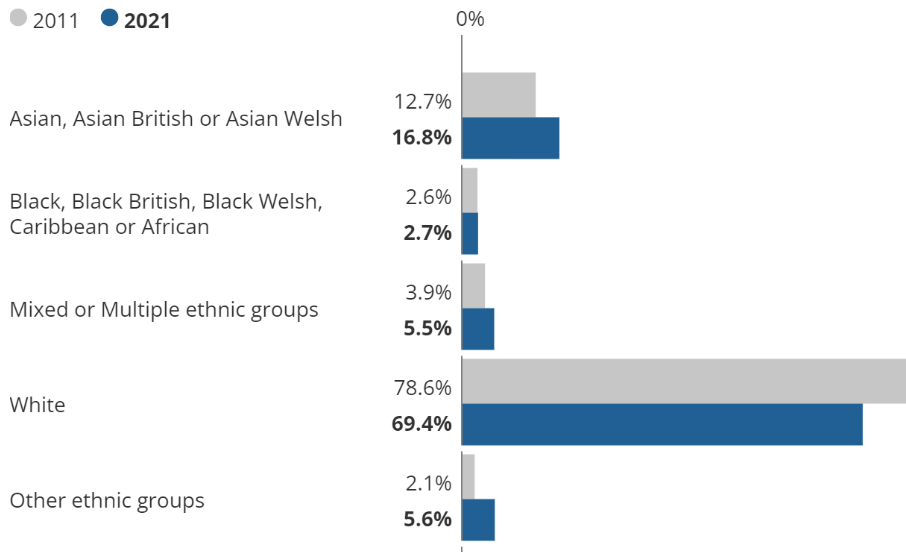


Figure 6: Age profile of City of London residents by gender (source: GLA)

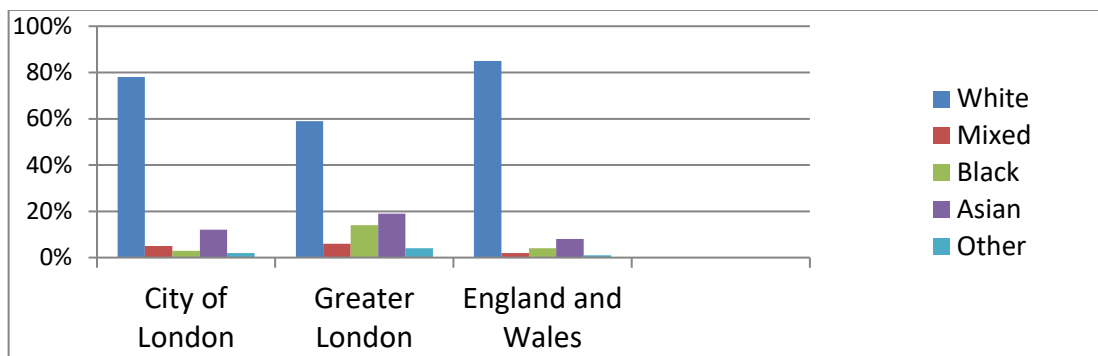
### Ethnicity of resident population

- 3.8. The white ethnic group decreased from 90% of the population in 1991, to 84% in 2001, to 78.5% in 2011 and to 69.4% in 2021 and is projected to fall further to 65% by 2036. The Asian ethnic group is projected to remain at the same proportion (13%) in the period to 2036. The black ethnic group is projected to increase from 3% in 2011 to 5% in 2036.

Percentage of usual residents by ethnic group, **City of London**



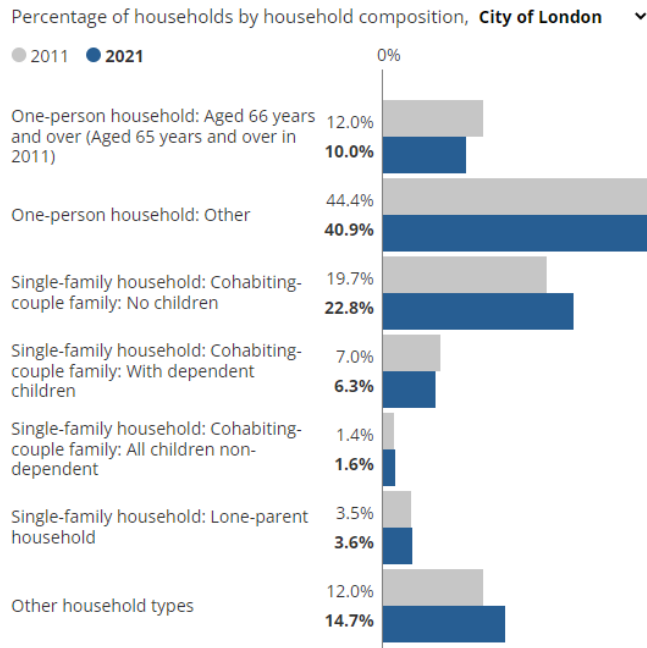
**Figure 7: Ethnicity of resident population in the City of London comparing data from the 2011 and 2021 Census (Source: 2011 and 2021 Census)**



**Figure 8: Ethnicity of resident population in the City of London compared to Greater London and England and Wales (source: 2011 Census)**

### Household structure

3.9. At the time of the 2021 Census, the City had a large percentage of one person households (50.9%), and a relatively low percentage of households without children (22.8%). This displays a decrease in the percentage of one person households from 2011 to 2021 of 12%, and an increase in single-family households of 15%.



**Figure 9: Household composition in the City of London between 2011 and 2021 (Source: 2011 and 2021 Census)**

3.10. Housing land use in the City of London is concentrated around four estates (Barbican, Golden Lane, Middlesex Street and Mansell Street), with the remainder living in smaller residential clusters at Smithfield, Queenhithe, Carter Lane and City West as indicated in Figure 10. 63% of housing on the Barbican Estate is owner occupied and 30% is privately rented; by contrast, two thirds of housing in the east of the City, principally in the Middlesex Street and Mansell Street Estates, is socially rented. Within the Square Mile, 97% of residential properties are flats, the majority in purpose-built blocks. Over half (52%) of our housing is one-bedroom flats – significantly above the Inner London average; by comparison, only around 1 in 7 homes (13%) are larger family houses – compared to over a third in Inner London. The Square Mile has a higher proportion of older residents than elsewhere in central London, and the number of older residents is growing faster than the general population.

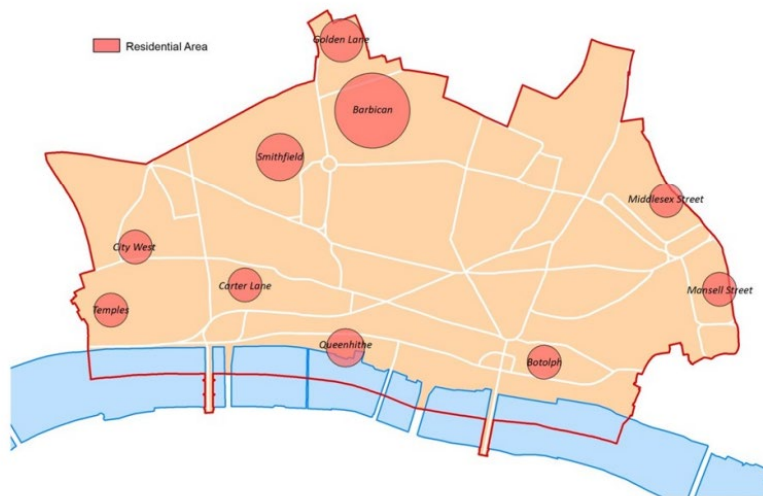


Figure 10: Residential areas in the City of London (City of London Local Plan 2015)

3.11. With regard to net additional dwellings, the 2021/22 financial year saw a net delivery of 433 units, including the completion of student housing at Vine Street and the completion of 160 dwellings at Stone House Court and Staple Hall, Bishopsgate. 2022/23 is projected to see the completion of 31 dwellings, with 87 dwellings due to complete in Aldgate and 644 student flats (equivalent to 258 dwellings) on Holborn, by 2025/26.

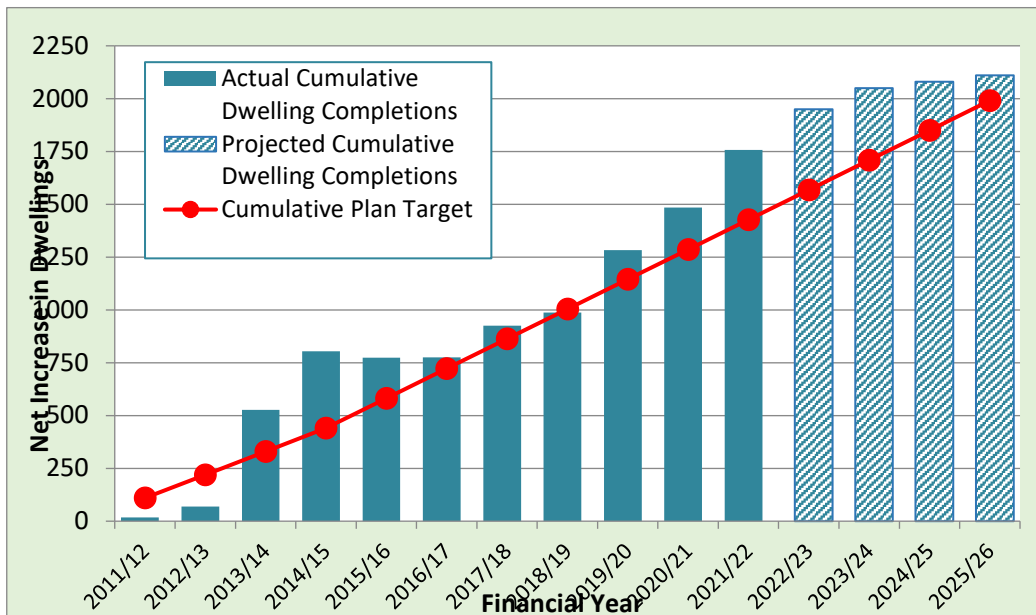


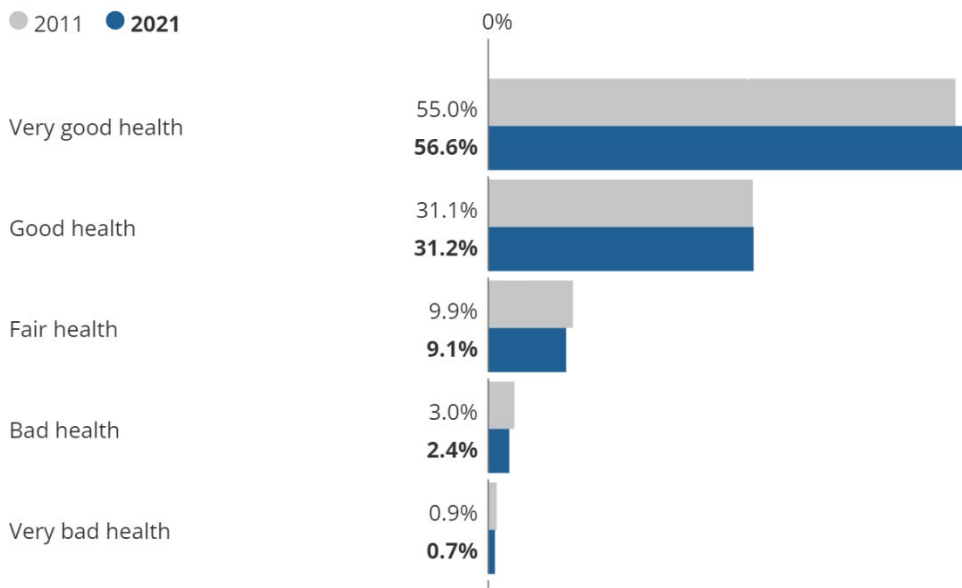
Figure 11: Housing Delivery: Actual and Projected Cumulative Completions measured against the Cumulative Target

## Context and baseline – health

- 3.12. Most City residents consider themselves to be in good or very good health (87.8% of all residents). In 2021, 56.6% of City of London residents described their health as "very good", increasing from 55.0% in 2011. Those describing their health as "good" rose from 31.1% to 31.2%. The health of the City's workers and residents is generally better than the London (proportion of population who report their health as very good: 56.5%) and national averages (proportion of population who report their health as very good in 2021: 45.0%).
- 3.13. This perception is consistent with the findings from a 2012 independent survey 'The Public Health and Primary Healthcare Needs of City workers'. It is most likely related to City workers' relatively young demographic profile, together with their relatively higher incomes which is generally associated with better health outcomes.
- 3.14. The percentage of people who were identified as being disabled and limited, including a long-term health problem is at 11.8% as of 2021. This figure is lower than in Greater London or elsewhere nationally, but there are variations in health between neighbourhoods, reflecting the patterns of relative social and economic deprivation in the City. Poor health is more prevalent in the Portsoken and Golden Lane areas, where ill health and disability affect around 20% of households.
- 3.15. It can be inferred that the general health of the City of London residents has improved through three factors:
- The percentage of "good health" has risen very slightly from 31.1% in 2011 to 31.2% in 2021. Furthermore, 56.6% describe themselves as being in "very good health."
  - The percentage of bad health has decreased from 3% in 2011 to 2.4% in 2021.
  - The percentage of fair health has decreased from 9.9% in 2011 to 9.1% in 2021.<sup>iv</sup>



Age-standardised proportion of usual residents by self-reported health,  
**City of London**



**Figure 12: City of London’s residents perceptions of health (source: 2011 and 2021 Census)**

- 3.16. Data from the 2019 Public Health England Profile of the City of London advises that the City’s residential population still enjoys better than average health, although due to the small population in City of London the indicators have a large margin of error and should be used with caution. Male life expectancy at birth was 86.8 years, which was 9.3 years higher than the England average. Female life expectancy at birth was 90.7 years, which was 7.6 years higher than for England. Adverse health outcomes such as excess weight, low fruit and vegetable consumption and hospital admissions for alcohol misuse were all lower than the national average. However, new STI diagnoses, rates of being killed or seriously injured on roads, and estimated dementia diagnosis, were all higher than nationally. Based on the 2017 Public Health England Profile of the City of London, the City had a higher proportion of mortality attributable to particulate air pollution (7.0%) than London (5.6%) and England (4.7%).
- 3.17. The COVID-19 pandemic heightened the value of urban green spaces to alleviate the human wellbeing consequences of ‘lockdown policies’ notably that of social isolation and mental health, as well as the general benefits of urban green space for physical exercise, relaxation, and observing nature. The pandemic also drew attention to inequalities in access to urban green space. The City of London has seen an increase in open space from 32.22 hectares (322,200m<sup>2</sup>) to 34.55 hectares (345,500m<sup>2</sup>) between 2011/12 and 2021/22. The provision of new open space in the City of London has included the replacement of open space lost due to redevelopment works, and city public realm projects, providing open space on underused street space. This has provided inclusive access to open spaces in the City.

- 3.18. Between 2022/23 and 2025/26, total open space is projected to increase to 35.92 hectares (359,200<sup>2</sup>), which will help to encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.
- 3.19. Further to this, the City of London is committed to increasing green roofs, with a significant increase in extensive green roofs from 22 to 74, with an increase in the green roof area from 7,900m<sup>2</sup> (0.79 ha) to 33,700m<sup>2</sup> (3.37 ha). There was a smaller increase in sites with intensive green roofs, from 17 to 34 across the same period, which equates to an increase in the green roof area from 13,500m<sup>2</sup> to 21,000m<sup>2</sup>. Sites comprising a mixture of extensive and intensive green coverage increased from 4 to 12, with an increase in green roof area from 4,200m<sup>2</sup> to 10,700m<sup>2</sup>.
- 3.20. Roof terraces in many instances are integrated with green roof provision. However, in some cases the roof space may be either just a roof terrace or a green roof. Sites with roof terraces only increased from 14 in 2011/12 to 36 in 2021/22, and are projected to increase to 60 in 2025/26. However, sites with roof terraces and green roofs increased from 24 in 2011/12 to 73 in 2021/22, and are projected to increase to 94 in 2025/26. The existing increase in green roofs and roof terraces and anticipated growth over the next 5 years will promote mental health benefits such as the reduction of stress, as well as physical health benefits, particularly due to cleaner air.

#### **Progress against previous SA objectives – health:**

Objective: To improve the health of City workers, residents and visitors

- In the 2021 Census, 31.2% of City residents assessed their own health as “Good” with 9.1% reporting “Fair health”. The percentage of people who were identified as being disabled and limited, including a long-term health problem, is at 11.8%.
- Residents’ perception of their health remained better than the London and national averages and updated 2017 and 2019 figures demonstrate that the City’s health continues to be better than elsewhere, with the exception of mortality attributable to air pollution. STI diagnoses, rates of being killed or seriously injured on roads and estimated dementia diagnosis are all higher than elsewhere nationally.

#### **Commentary**

Local Plan social infrastructure policies which protect health facilities, working in partnership with neighbouring authorities to provide facilities outside the City, may have contributed to the retention of a relatively healthy population. The Local Plan’s general approach to encouraging healthy lifestyles, tackling air pollution and safety and security reinforces this trend.

### Likely evolution without a Local Plan Review

The health of City residents is likely to remain above average since the City is a relatively affluent area with easy access to health facilities. Positive policies in the existing NPPF, London Plan and the adopted Local Plan which enable healthy lifestyles should bring health benefits for residents and workers. With no further action on air pollution beyond the existing Local Plan approach, air quality may not improve as quickly or significantly.

### Context and baseline – education and qualifications

- 3.21. City workers and residents generally report high levels of educational qualification. Trends over the last seven years indicate the number of primary and secondary school applications have remained consistent. There are no maintained secondary schools in the City; therefore, all applications are made to schools in other boroughs. The City Academy Hackney, City of London Academy Islington and City of London Academy in Southwark are sponsored by the City Corporation.
- 3.22. In 2021, the proportion of the population of City of London aged 16-65 qualified to at least Level 4 (degree level) or above qualifications was reported to be 94.4%, compared to the London average of 58.9%. Further to this, two thirds of City workers report having level 4 (degree level) or above qualifications compared with the London average of around 40%. This reflects the demands of City employers for a highly skilled professional workforce where the entry level qualification is a university degree. The qualifications levels are based on the Qualification and Credit Framework where level 4 and above is obtained at university level and includes certificates of higher education through to doctorate degrees. The greater proportion of level 4 qualifications is consistent with the representative work sectors traditionally seen in the City – that is, mainly of the financial and insurance sector (37%) and the associated professional services (18%), which require a level of higher education.<sup>v</sup>
- 3.23. City residents also report qualification levels above the London and national average.

Area Name	All Residents (16+)	No qualification	Highest Level of Qualification: Level 1	Highest level of qualification: Level 2	Highest level of qualification: Level 3	Highest level of qualification: Level 4	Highest Level of Qualification: Other	Highest Level of Qualification: Apprenticeship
City of London	6,800 persons	6.6%	2.8%	4.9%	8.8%	74.2%	1.7%	1%
Greater London	6,055,700 persons	5.5%	5.7%	9.6%	12%	59%	7.4%	0.8%

**Figure 13: Level of Education in City of London residents in comparison to Greater London (source: 2021 Census and Nomis 2021<sup>vi</sup>)**

Level 1: 1+ 'O' Level passes; 1+ CSE/GSE any grades; NVQ level1; Foundation GNVQ

Level 2: 5+ 'O' level passes; 5 +CSEs (grade 1's); 5+ GCSEs (Grades A-C); School Certificate; 1+A Levels/ AS Levels; NVQ level 2; Intermediate GNVQ

Level 3: 2 + 'A' Levels; 4+ AS levels; Higher School Certificate; NVQ level 3; Advanced GNVQ

Level 4/5: First degree; Higher Degree; NVQ levels 4 and 5; HND; Qualified Teacher status; Qualified Medical Doctor

#### **Progress against previous SA objective – education:**

Objective: Improve the education and skills of the working and residential population

- In 2001, 60% of City residents achieved level 4/5 qualifications. In 2011, 68% of residents achieved degree level qualifications or above. This represents a moderate increase in educational attainment for City residents. This saw further increase in 2021, with 74.2% of residents achieving degree level qualifications or above.
- In the 2011 Census, two-thirds of City residents reported having at least level 4 qualifications, by 2021 this figure stood at 69%.
- This greater proportion of level 4 qualifications is consistent with the work sectors traditionally seen in the City, such as the financial and insurance sector and associated professional services, which require a level of higher education.

#### **Commentary**

Educational qualification levels amongst City residents improved in the 10 years 2011-2021 and the City continues to attract workers with high levels of educational attainment. This is supported by the Local Plan approach of providing educational facilities for all stages of educational need. For secondary school needs this includes the provision of educational facilities in partnership with neighbouring boroughs where appropriate.

#### **Likely evolution without a Local Plan Review**

The City is likely to continue to enjoy a higher than average level of educational attainment in the resident and working population, with high levels of professional qualifications. Changes in the balance of jobs in the financial services, legal, accounting and technology, media and telecommunications sectors are unlikely to alter this high skills profile.

### **Context and baseline – workplace population**

3.24. The City's residential base remains relatively small and the majority of people present in the City during the daytime are workers and visitors. There are a range of

data sources for analysing employment. The Business Register and Employment Survey (BRES) is a count of employment registration that enables an annual review of employment trends analysed by industrial sector. An alternative data source, Nomis, provided by ONS, produces official labour market statistics. The decennial Census is another data source, which enables a detailed analysis of the characteristics of the workforce.

- 3.25. BRES data shows a steady increase in total employment in the City from approximately 332,000 in 2009 to approximately 591,000 in 2021, with employment increasing every year in that period except 2013 (see Figure 14). Data taken from the City Statistics briefing shows that in 2021, there were 587,000 workers in the City of London, or 1 in every 54 of all British workers. City jobs have grown over 8% since pre-pandemic 2019 to 2021, with nearly 45,000 more jobs than in 2019<sup>vii</sup>. Employment in the City accounts for one in every five financial services jobs in Great Britain.

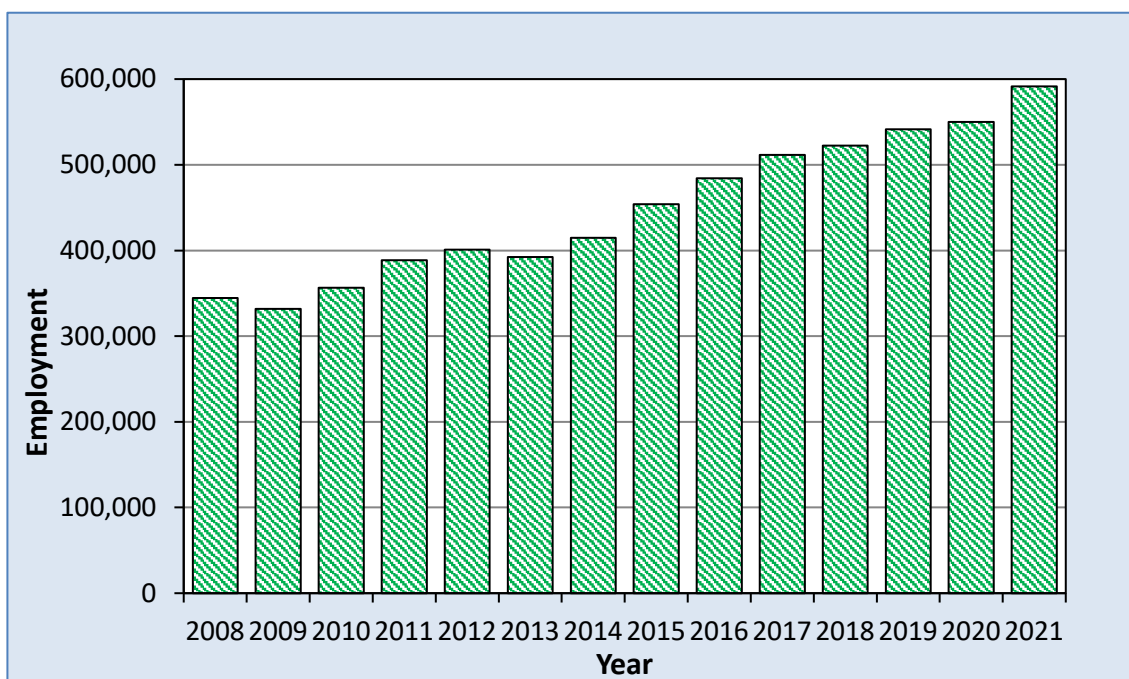


Figure 14: Employment in the City of London 2008-2021 (Source: BRES)

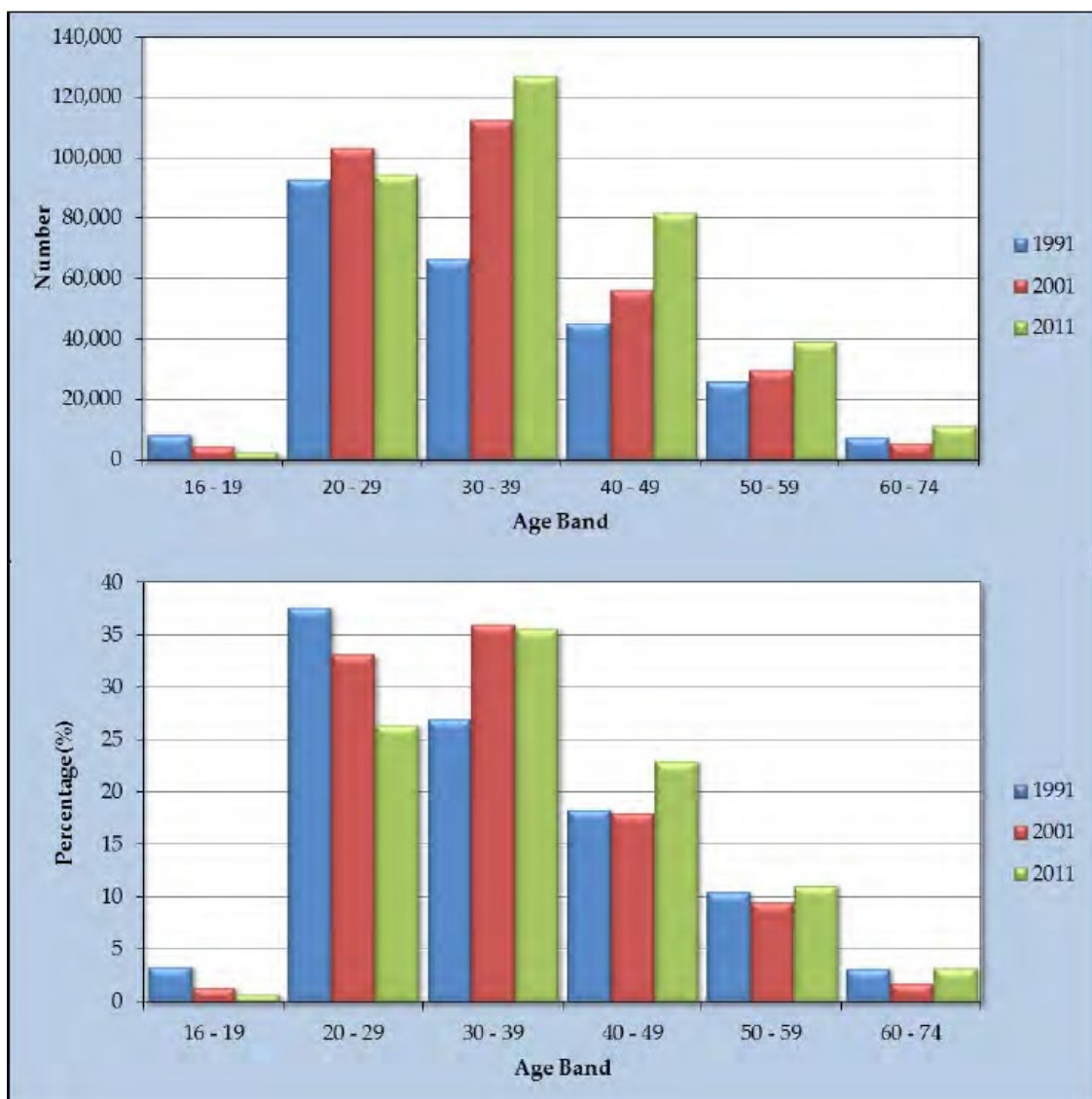
### Gender of City workforce

- 3.26. Between the 2001 Census and the 2011 Census, the proportion of men in the City's workforce rose slightly from 29% to 61%, and by 2022, the proportion of male workers rose slightly to 64%. The proportion of female workers declined from 41% to 39% between 2001 and 2011, and saw a further decrease to 36% in 2022.

### Age structure of City workforce

3.27. It can be inferred from the Census in 2001 and 2011 that the age band of 30-39 years old is the most concentrated, although in 2021 this shifted to the age band of 25 to 34 years old. Since 1991, the number of City workers in the 30 to 39 age range has increased significantly, rising by 91%, while the proportion of workers in this age bracket has risen from 27% to 36%. Similarly, the number of workers in the 40 to 49 age range has increased by 80%, and the respective proportion of the workforce has risen from 18% to 23%. The absolute number of workers under the age of 30 has remained relatively stable from 1991 to 2011, but they remain a key age group in the City, with 20 to 29-year olds accounting for a quarter (26%) of the total workforce. Data from the City Statistics briefing confirms this trend, with 22-39 year olds accounting for 61% of the total workforce in 2022, compared to 40% in England and Wales.<sup>viii</sup>

3.28. Comparison of the age structure of the working population between 1991 and 2011 shows a shift towards a slightly older workforce with decreases in the percentage of workers in the 16-19 and 20-29 age groups and increased percentages in the over 40



age bands. However, over 60% of the City’s workforce was still under the age of 40. Note, at the time of publication of this report, detailed workforce data from the 2021 Census was not available.

Figure 15: Change in age structure - City workers 1991-2011 (Source: 2011 Census)

### Socio- economic grouping of City workforce

- 3.29. In 2021, Financial services form the largest sector of the City of London workforce (36%), followed by professional services (27%), administration and education (6%) and information and communication at 11%.
- 3.30. This differs from the Greater London workforce, for which professional, scientific and technical activities make up the largest sector of the workforce (14.2%), followed by wholesale and retail trade; repair of motor vehicles and motorcycles (11.4%), and human health and social work activities (10.6%).

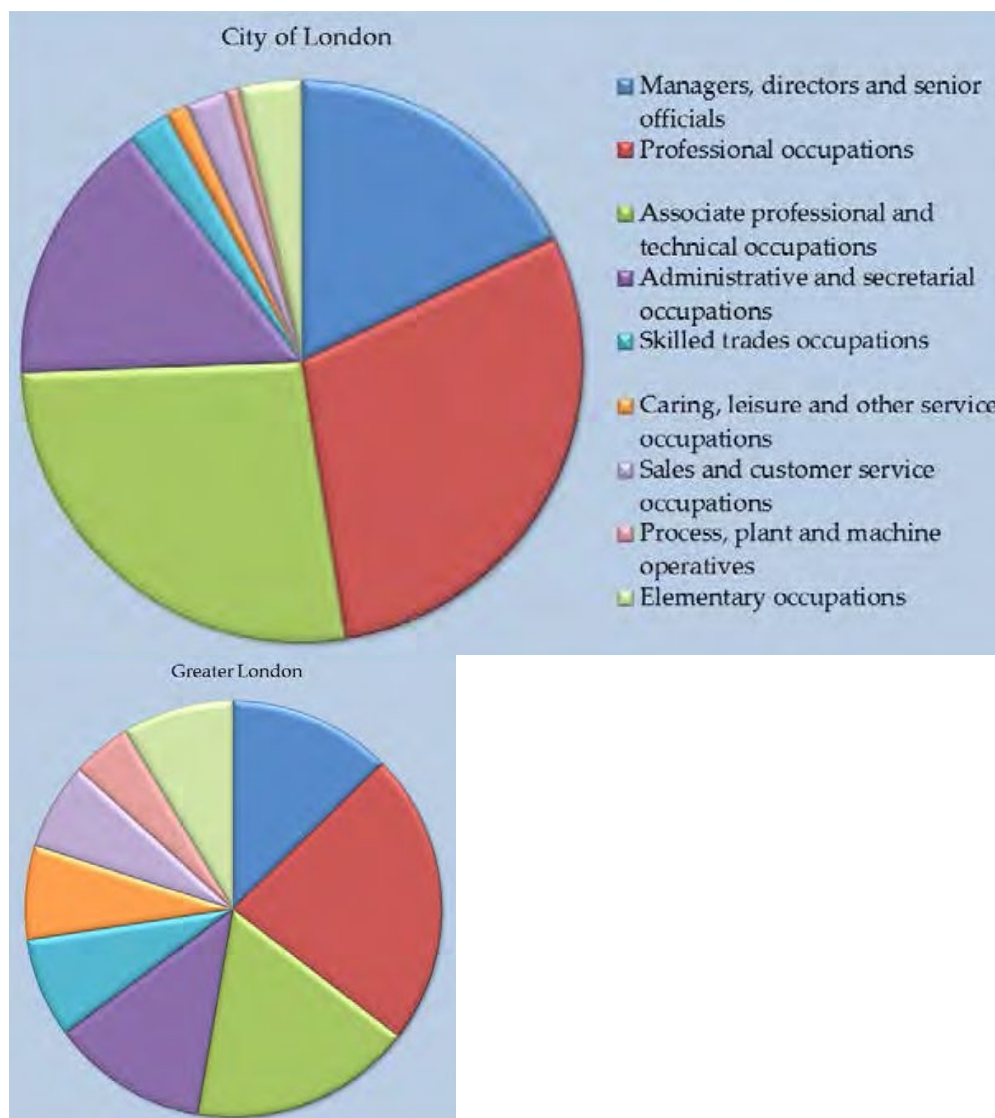


Figure 16: Workforce Occupations in the City of London and Greater London (source: 2011 Census)

### Progress against previous SA objective – equality and accessibility:

Objective: Improve equality and accessibility for all

Census data shows that the proportion of males working in the City is higher than females. This balance has fluctuated slightly over the period from 1991 (60% male 40% female), 2001 (59% male 41% female), 2011 (61% male 39% female), and 2022 (64% male 36% female). The City's workforce continues to be dominated by younger workers, with 22-39 year olds accounting for 61% of the total workforce in 2022, although the proportion of workers in the over 40 age bands has increased between 2001 and 2021.

### Commentary

Equality Impact Assessment is carried out on the Local Plan policies to ensure that they do not discriminate between different groups of people, foster good relations within the community and advance equality of opportunity.

### Likely evolution without a Local Plan Review

The City's workforce is likely to continue to be dominated by younger workers. Changing work styles and economic uncertainty following COVID-19 and the UK's departure from the EU could influence access to City jobs for some individuals. It is uncertain what types of workspace will be required to ensure equal access to jobs under new economic conditions and ways of working.

## Industrial sectors of City workforce

3.31. Figure 17 shows a breakdown of employment by sector in the City of London.

Industrial Sector	Total	%
Manufacturing and Construction/Wholesale and Retail/Transportation and Storage	33,600	5.7
Accommodation and Food Services	17,000	2.9
Information and Communication	66,000	11.2
Financial and Insurance	216,000	36.6
Professional and Estate	161,000	27.2
Administrative and Education	97,000	16.4
Total	591,000	100

Figure 17: Employment by industrial sector in the City of London 2021 (source: BRES)



- 3.32. While the Financial and Insurance sector remains the single largest sector in the City, the relative dominance of this sector has declined from 48% of all City employment in 2001 to 36.8% in 2021.
- 3.33. The distribution of employment in the City demonstrates a tendency for clustering of particular employment sectors, with a noticeable distinction between the dominance of professional and estate occupations in the west of the City compared to financial occupations in the east and central parts of the City. Figure 18 illustrates the employment in each industrial sector in the City of London based upon 2018 BEIS data.

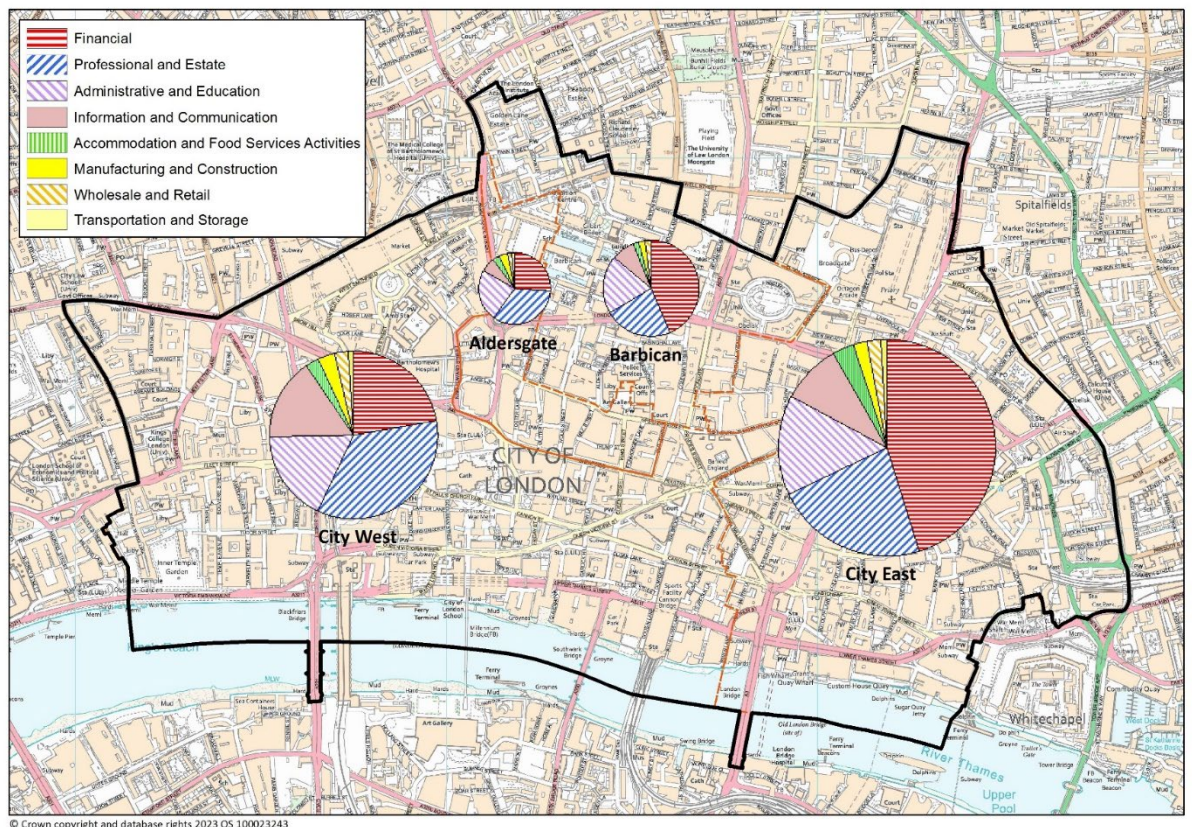


Figure 18: Employment sector distribution in the City of London 2021

### Progress against previous SA objective – employment:

Objective: Increase opportunities for rewarding employment in the City of London

- Employment numbers in the City stood at 331,900 in 2009, growing steadily to 522,500 in 2018, and 591,000 in 2021.
- Analysis of the different employment sectors in the City shows a range of different occupations with
- 216,000 or 36.6% of the City's workforce are in financial and insurance services, 161,000 or 27.2% are in professional services.

## **Commentary**

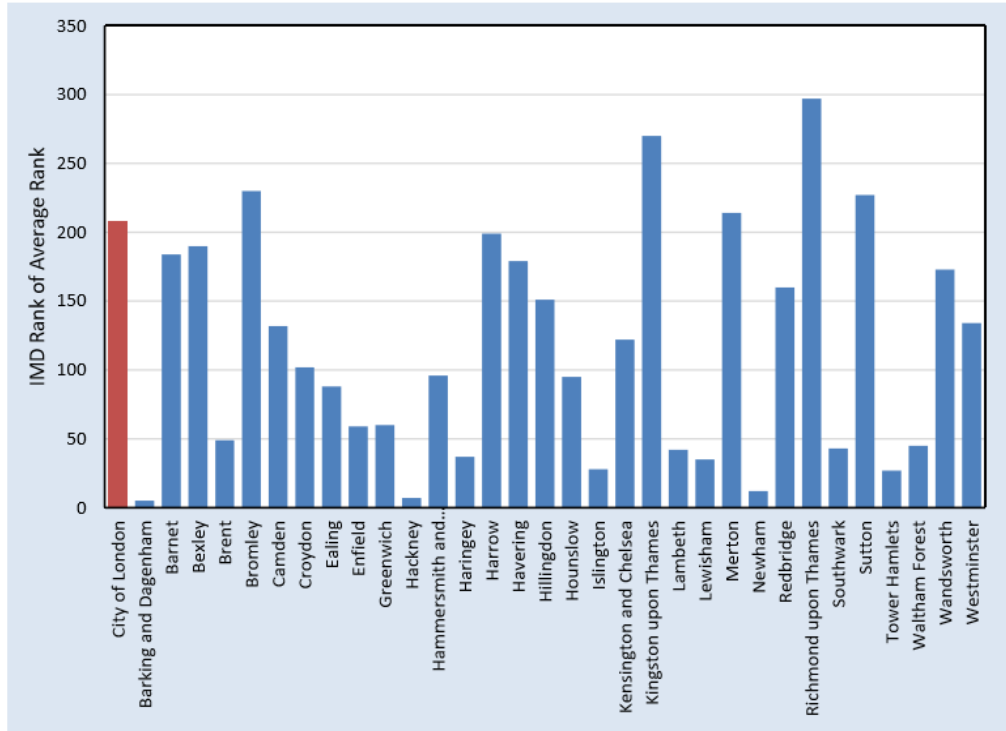
The Local Plan's primary objective of maintaining the City's position as a world leading international financial and business centre contributes to the SA objective of increasing opportunities for rewarding employment in the City. This includes employment in a wide range of supporting roles. The overall trend in employment numbers is increasing.

## **Likely evolution without a Local Plan Review**

GLA interim employment projections (published October 2022) predict continued employment growth in the City throughout the period to 2040. Monitoring against the Local Plan floorspace targets will provide essential information on future trends.

## **Context and baseline - deprivation**

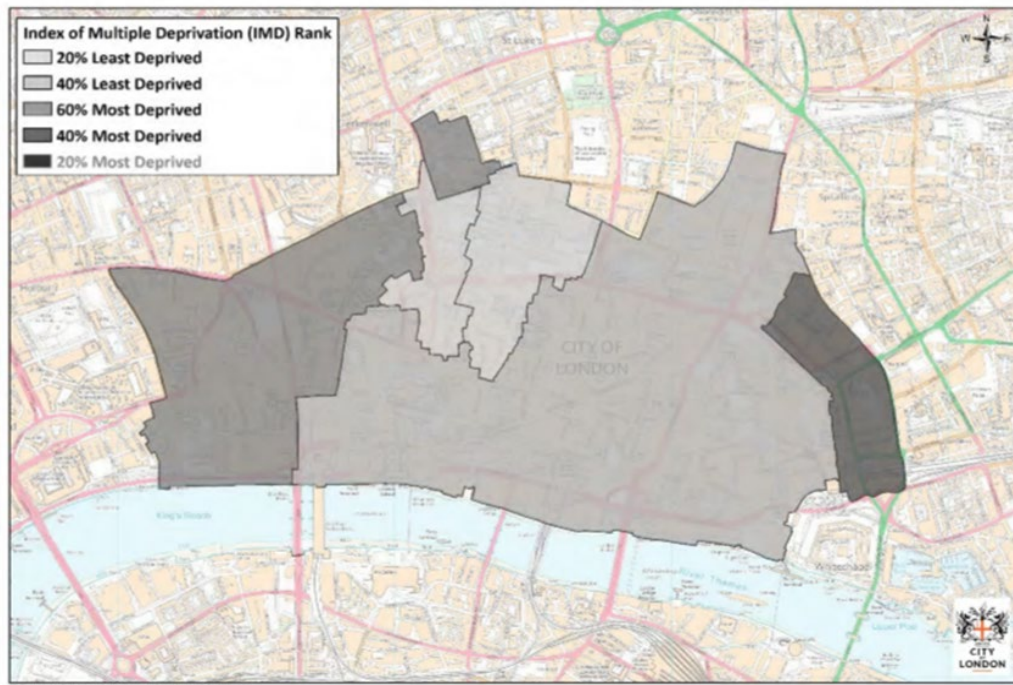
- 3.34. The image of the City is as a privileged place based on its workforce and resident population, but it is surrounded by less affluent areas some of which have high levels of deprivation. The City can be a catalyst for improvements in surrounding areas through the provision of local jobs, skills transfer to surrounding areas and development of affordable housing in areas adjacent to the City.
- 3.35. As shown in Figure 19 below, the City of London is a relatively affluent district; it is ranked 208 out of the 318 Local Authorities in England (where 1=most deprived). Thus, the City is within the 40% least deprived Local Authorities in England and is the sixth least deprived in Greater London.
- 3.36. However, there are disparities within the Square Mile. Figure 20 illustrates that there are two Lower-level Super Output Area (LSOAs) in the City that are within the 20% least deprived in England; these are the Barbican East and Barbican West. In contrast, the Mansell Street and Petticoat Lane LSOA is the most deprived in the City and falls into the 40% most deprived in England.



Graph 1: Rank of Average Rank for London Boroughs

Source: Indices of Deprivation, Source: Ministry of Housing, Communities and Local Government, Crown Copyright, 2019

Figure 19: Index of Multiple Deprivation – City and London boroughs 2019



Map 3: Rank of IMD Quintile, City of London

Source: Indices of Deprivation, Source: Ministry of Housing, Communities and Local Government, Crown Copyright, 2019

Figure 20: Map showing distribution of deprivation within the City of London 2019

### **Progress against previous SA objective - deprivation:**

Objective: Reduce poverty and promote social inclusion in and around the City

- The index of multiple deprivation shows that the City of London is relatively affluent compared to neighbouring boroughs and to London as a whole, but there are disparities with pockets of deprivation in the City.

The City provides increasing employment opportunities for residents of these neighbouring boroughs, contributing to their economic prosperity. The number of people travelling less than 5km to work in the City has increased from 7% of the workforce in 1991 to 13% in 2011, although 2021 and 2022 have seen a rise in hybrid working in response to the pandemic. In 2021, 67.3% of all City of London residents in employment were working mainly from home, representing the largest percentage across England.

### **Commentary**

The Local Plan's approach to maintaining the City as a global financial and business centre, providing a range of job opportunities, may have contributed to a relative reduction in levels of deprivation in surrounding boroughs, although this is impossible to quantify. The City Corporation's provision and management of social housing in neighbouring boroughs may also have made a contribution. Policies which encourage walking and cycling will contribute to low cost access to jobs for neighbouring boroughs' residents.

### **Likely evolution without a Local Plan Review**

Deprivation levels may be sensitive to economic fluctuations as a result of the COVID-19 pandemic and the UK's departure from the EU. Local training, skills and job brokerage activities funded by development in the City will continue to provide opportunities and benefits for local communities inside and outside of the City. Changes in national legislation and policies relating to planning and housing could reduce the supply of new rented affordable housing funded by development in the City.

### **Context and baseline – crime**

- 3.37. Crime statistics for the City differ from those in other areas due to the low resident population and high numbers of people working and visiting the City daily. Comparisons with other areas are inappropriate as national crime statistics are quoted as rates per resident. The City of London Police publishes crime statistics on their website.
- 3.38. Overall, crime levels in the City rose modestly between the first quarter of 2018 and the last quarter of 2019, but fell sharply during 2020. Since this coincided with the COVID-19 pandemic, this may only be a short-term reduction.

- 3.39. In April 2023, the overall crime level in City of London was 851 crimes, which expressed per 1,000 workers, equates to a crime rate of 1.44 per 1,000 workers, comparing favourably to London's overall crime rate for 2022 of 95 per 1,000 residents.
- 3.40. Between 2022-2023 crime rates rose, although not to the same levels seen in the first quarter of 2018 and last quarter of 2019. The most common crime in the City of London is other theft, with 1,963 offences during 2022. This is 86% higher than 2021 figure of 1,057.

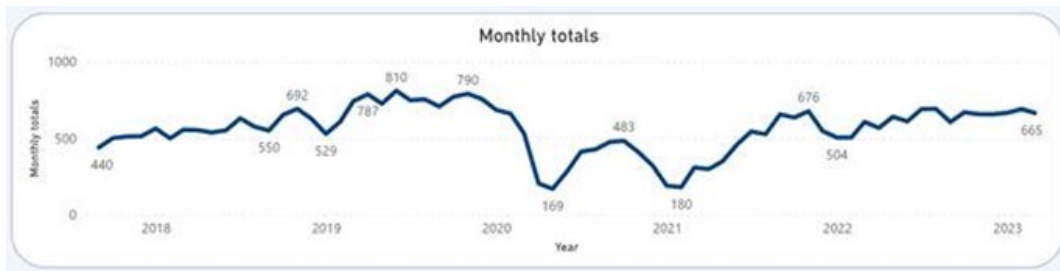


Figure 21: Crime in COL monthly totals (2023)

- 3.41. Figure 22 shows a summary of the data for April 2022 to March 2023.

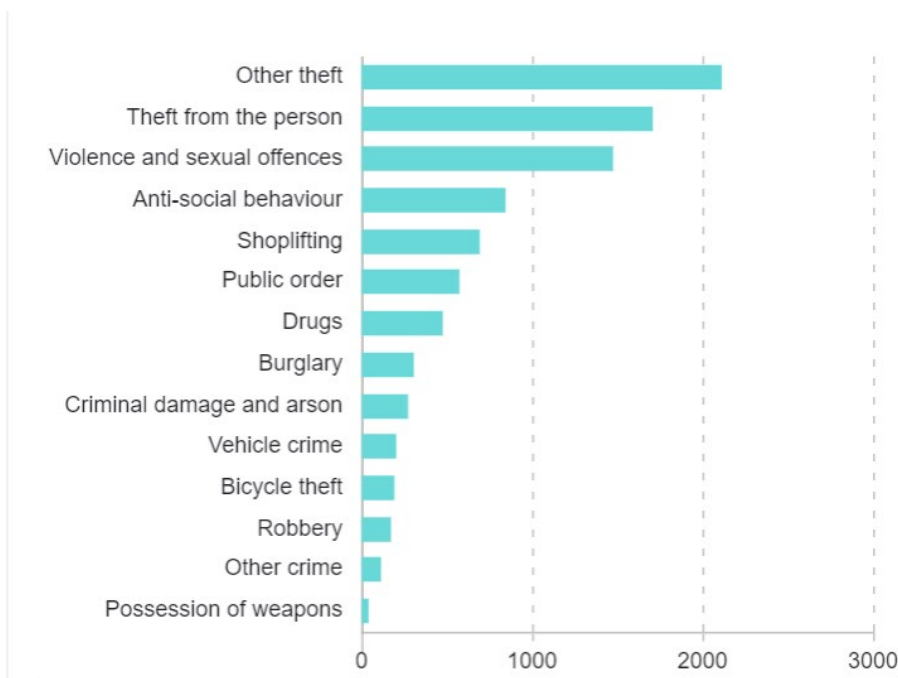


Figure 22: Crime Statistics for City of London 2022-2023

**Progress against previous SA objective – crime:**

Objective: Tackle anti-social behaviour

- Due to changes in the way crimes are categorised it is not possible to compare trends in this document but trends for most crimes in the City have shown an

overall decrease since 2011, with a modest increase during 2018 and 2019. Figures rose from 2021 to 2022, but have since fallen back slightly. The increase in night-time activity premises in recent years has meant crime associated with anti-social behaviour has increased.

### **Commentary**

There are many factors that affect crime rates and it is difficult to assess the impact of planning policies on overall levels of crime or specific types of crime. Local Plan policy on security and safety, which influences the design of buildings and the public realm, contributes to crime prevention through measures such as passive surveillance and hostile vehicle mitigation. A specific development management policy relating to night-time entertainment was adopted in 2015.

### **Likely evolution without a Local Plan Review**

Adopted planning and licensing policies should help to mitigate anti-social behaviour associated with the night-time economy. Increased pedestrian densities resulting from expansion of the City's workforce and higher visitor numbers could increase opportunities for pick pocketing and other petty crimes.

## **4. Soil and water**

### **Context and baseline – contaminated land**

- 4.1. Part 2A of the Environmental Protection Act 1990 and the Contaminated Land (England) Regulations 2006 provide the legal framework for the management of contaminated land. Defra published further guidance in 2012 elaborating on the remediation provisions of Part 2A. The City of London published its Contaminated Land Inspection Strategy for 2021-2030 in November 2021. This strategy revises and updates the original 2001 strategy and subsequent reviews in 2004 and 2015. It contains information about the characteristics of the City and seeks to set out clearly the City's approach to dealing with contamination using Part 2A. The priorities of this strategy are to:
  - Protect human health
  - Protect controlled waters
  - Protect designated ecosystems
  - Prevent damage to property
  - Prevent further contamination of land
- 4.2. This strategy includes:

- aims, objectives and priorities, taking into account the characteristics of the City of London's area;
- description of relevant aspects of the City of London;
- approach to 'strategic inspection', 'detailed inspection' and remediation activity of the City/or parts;
- approach under Part 2A so that sites do not become capable of being 'contaminated land' in the future; and
- how to minimise unnecessary burdens on the taxpayer, businesses and individuals.

4.3. This strategy states that the high concentration of buildings and hard cover in the City, with a high concentration of residential properties in at the Barbican Estate, Golden Lane Estate, Middlesex Street Estate and Mansell Street, means that direct contact with soil and inhalation of soil dust pathways will be largely interrupted. Although, some of these properties have access to private and communal gardens which would create a direct contact or inhalation pathway for exposure if contaminants are present. It is considered that contamination will have been removed as a result of the development management process (to form basements etc) thus interrupting the contaminant-pathway-receptor model. However, ground associated with bomb damage and use of backfill means residual issues could remain, providing opportunity for further inspection.

#### **Progress against previous SA objective – contaminated land:**

Objective: To ensure that the City is a safe and pleasant place to live and work

- Investigation of development sites to ensure that the City remains free from contaminated land contributes to keeping the City a safe place to live and work.
- The 2021 contaminated land inspection strategy sets out a framework detailing a proportionate approach to management of the risks raised by land contamination, whilst ensuring that any unacceptable risk to human health or the wider environment from land contamination is removed. The Strategy outlines the City Corporation's approach to dealing with land contamination using Part 2A over the next 10 years, summarising the City Corporation's wider approach to considering and regulating contaminated land through development management, whilst reflecting the uniqueness of the Square Mile.

#### **Commentary**

Local Plan policy must continue to promote investigation of the potential for land contamination identifying pathways between sources and receptors.

#### **Likely evolution without a Local Plan Review**

The processes and procedures that are currently in place should ensure that the City continues to remain free from contaminated land.

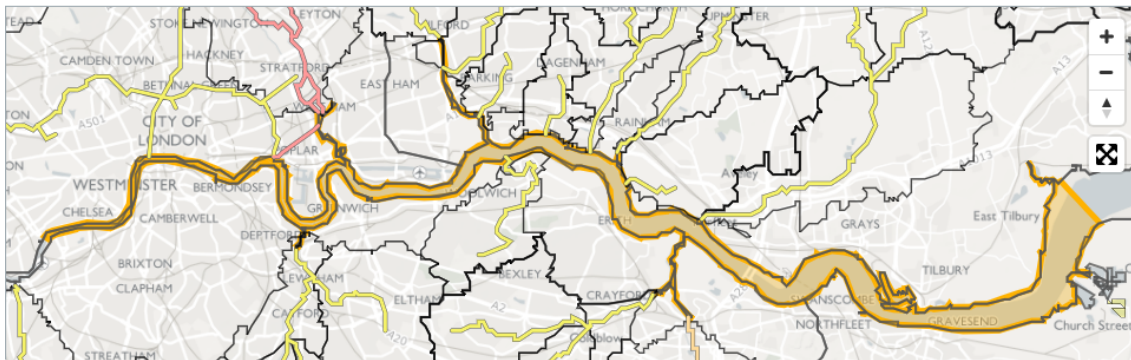
#### **Context and baseline – water resources**

- 4.4. The South East of England faces the greatest pressures of public water supplies in England, and this region therefore needs to develop options to supply more water, equivalent to all the new water resource options and transfers in company WRMPs.
- 4.5. With regard to London specifically, Thames Water provides over 10 million Londoners with water, and projects a significant growth in demand, with the total baseline demand forecast (before intervention) expected to increase by more than 265 MI/d in the period of 2023 – 250. In relation to non-household water use, this is forecasted to increase by approximately 60 MI/d over the planning period to 2050 and a total increase of 72 MI/d by 2075. <sup>ix</sup>
- 4.6. The Thames Water Resources Management Plan 2019, and emerging Water Resources Management Plan 2024 (draft) sets out planned measures to alleviate water stress for Thames Water-served regions. The key targets as highlighted by the draft are:
- reduce leakage by 50% (from 2017-18 levels) by 2050;
  - To maximize feasible PCC reductions by 2050
  - smart meter all practicable connections by 2035
  - minimise unmeterable properties by 2040
  - wipe out most wastage by 2050
  - minimise impact on customer bills
  - minimise carbon cost
  - create a deliverable, resilient and ambitious programme

#### **Progress against previous SA objectives – water resources / efficiency :**

- 4.7. Context and baseline – water quality The Water Framework Directive provides a legal obligation to prevent the deterioration of water bodies, including their biological quality elements and supporting elements. In accordance with this legal obligation, the Directive sets specific goals for all water bodies to achieve at least ‘good status’ by 2015.
- 4.8. However, provided that certain conditions are satisfied, in some cases the achievement of good status may be delayed until 2021 or 2027. The water quality in the River Thames is in danger of failing to meet these EU targets, partly due to the periodic discharge of sewer outflows into the river during heavy rainstorms. The City of London area falls within the Tidal Thames operational catchment where the Environment Agency’s ‘Thames Middle’ water body water quality data is the most relevant (Figure 23).





## THAMES MIDDLE Overview

Download Water Body as [CSV](#) / [GeoJSON](#)

Overall classification for 2019  
**Moderate**

<b>Id</b>	GB530603911402
<b>Type</b>	Transitional Water
<b>Hydromorphological designation</b> <sup>i</sup>	heavily modified
<b>NGR</b> <sup>i</sup>	TQ3295080508
<b>Surface area</b>	4391.806 ha
<b>Surface area</b>	43.918 km2
<b>Surveillance Water Body</b> <sup>i</sup>	Yes

## Classifications <sup>i</sup>

### Cycle 2 classifications <sup>i</sup>

[Download as CSV](#)

Classification Item	2013	2014	2015	2016	2019
Overall Water Body	Moderate	Moderate	Moderate	Moderate	Moderate
Ecological	Moderate	Moderate	Moderate	Moderate	Moderate
Chemical	Fail	Fail	Good	Fail	Fail

Figure 23: Environment Agency Thames Middle Water Quality Data 2013-2019

### Progress against previous SA objectives – water quality:

Objective: Improve water quality and enhance management of the resource

- Environment Agency data shows that there has been no significant change in the water quality in the Thames Middle water-body between 2013 and 2019, with an overall classification of moderate.

### Commentary

The Local Plan supports the construction of the Thames Tideway Tunnel completion of which, in 2025, should result in a significant improvement in river water quality in the Thames. The Thames Tideway Tunnel will alleviate the symptoms of an over-pressured sewer system by reducing the frequency of CSO discharges. A reduction in

surface run-off in the City would form a proactive contribution to addressing the pressure of combined sewer overflow discharges on the Thames Middle waterbody.

### Likely evolution without a Local Plan Review

The water quality in the River Thames should improve when the Thames Tideway Tunnel opens in 2025. However, the City of London Corporation can also play a role in mitigating the causes of CSO discharges following the guidance of the Thames Water Catchment Strategic Plan.

## 5. Air

### Context and baseline – Air quality

- 5.1. The City of London, alongside the rest of central London, is an Air Quality Management Area for fine particulates (PM10) and nitrogen dioxide (NO<sub>2</sub>). In the City, nitrogen dioxide is continuously monitored at three locations: (1) Beech Street; (2) Walbrook Wharf; and (3) The Aldgate School (formerly Sir John Cass School), with diffusion tube monitoring placed at various other locations around the Square Mile.

#### 7-Year trend in Nitrogen Dioxide (NO<sub>2</sub>) concentrations:

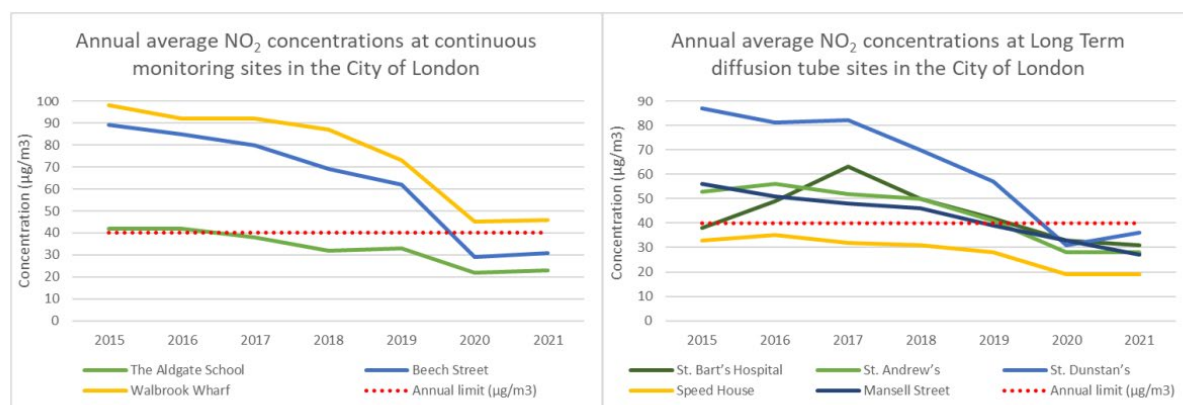


Figure 24: Annual average NO<sub>2</sub> concentrations at monitoring sites 2015-2021

- 5.2. Since 2015, concentrations of nitrogen dioxide at background sites (away from the direct influence of traffic) have been gradually decreasing. Figure 24 shows the trends during this period at the three continuous monitoring sites and at five other sites where diffusion tubes have been placed on a long-term basis. Levels of nitrogen dioxide at The Aldgate School dipped below the annual objective of 40 µg m<sup>-3</sup> in 2017, with concentrations now around 22 µg m<sup>-3</sup>. The exception to the downward trend is St Bart's Hospital site, which experienced a sharp increase in 2016-17 associated with the installation of a new energy centre. Work has been undertaken to rectify this issue and concentrations are declining again. Roadside concentrations of nitrogen dioxide saw significant falls across nearly all City sites in 2021.
- 5.3. Figure 25 shows trends in PM10 concentrations from 2015 to 2021 at the three sites. There has been an overall reduction in PM10 levels at all sites over the past 7 years.

Slight increases in concentrations were seen at roadside sites in 2018. However, these reduced again in 2019. Annual average concentrations of PM<sub>10</sub> are significantly below the Limit Value of 40 µg/m<sup>3</sup> at all monitoring sites. Since 2007, the Limit Value has only been breached once in Upper Thames Street. This is thought to be associated with the construction of the cycle superhighway. Although the Limit Value is met, the World Health Organisation Guideline for PM<sub>10</sub> level of 20 µg/m<sup>3</sup> as an annual average has generally been breached at all sites, although it did fall below that level for both The Aldgate School and Beech Street in 2020, and remained below this level for 2021.

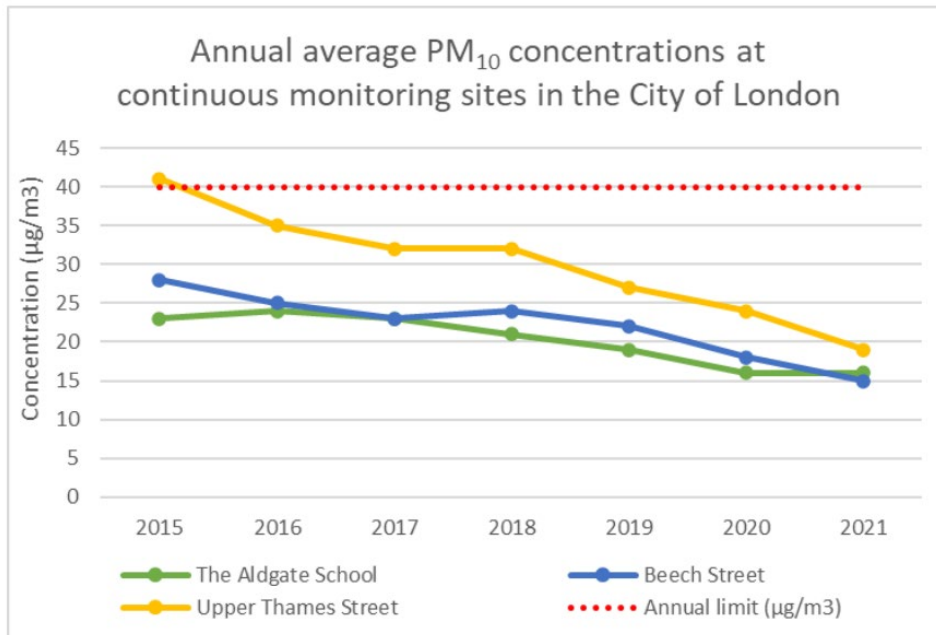


Figure 25: Annual average PM<sub>10</sub> concentrations at monitoring sites 2015-2021

- 5.4. PM<sub>2.5</sub> is measured in Farringdon Street and at The Aldgate Primary School. Figure 26 shows the annual average PM<sub>2.5</sub> concentrations at both sites since 2015. The results indicate that PM<sub>2.5</sub> meets the Limit Value of 25 µg/m<sup>3</sup> at these two locations, with an overall decline in concentrations at both sites between 2015 and 2021. However, concentrations are above the WHO Guideline, which is set at 10µg/m<sup>3</sup>. Like with PM<sub>10</sub>, there is little that can be done by the City Corporation in isolation that will have a significant impact on concentrations of this pollutant.

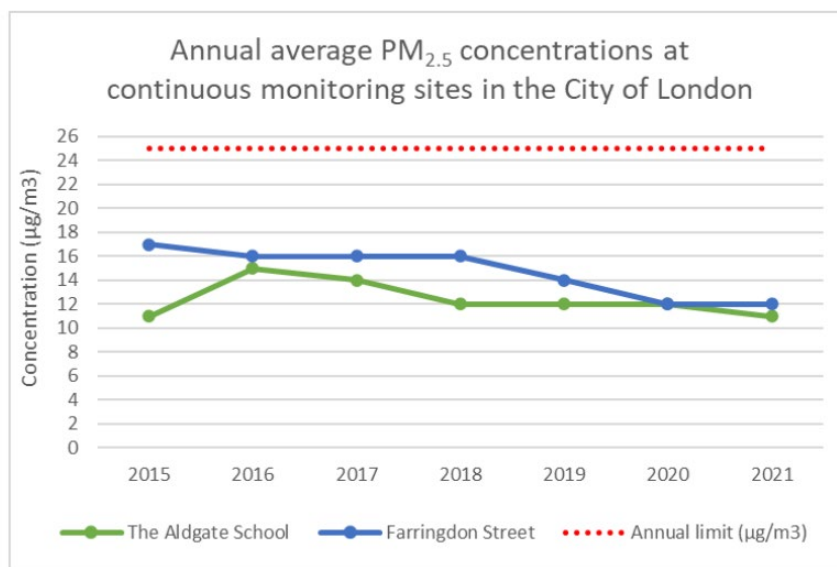


Figure 26: Annual average PM<sub>2.5</sub> concentrations at monitoring sites 2015-2021

## Other Pollutants

- 5.5. Carbon Monoxide, sulphur dioxide, lead, 1,3-butadiene and benzene concentrations in the City are low and continue to comply with the air quality objectives set for these pollutants.

### Progress against previous SA objective – air quality:

Objective: Improve air quality

- The City is an Air Quality Management Area for oxides of nitrogen (NO<sub>2</sub>) and fine particulates (PM10). During the period 2015-2021, all sites were significantly below the air quality objective of 40 µg m<sup>-3</sup> (annual average NO<sub>2</sub>, although the limit value was breached once in Upper Thames Street). The general trend is that concentrations have been falling during that period.
- Levels of PM10 and PM2.5 have been falling and annual average concentrations meet the relevant limit values at all locations. However, concentrations remain above the relevant WHO guidelines at most sites.

### Commentary

The implementation of a wide range of actions by the City Corporation to improve air quality, the health-based limits for nitrogen dioxide seem to be making a significant improvement on air quality in the Square Mile, and extensive monitoring, demonstrates that levels of nitrogen dioxide are reducing year on year, including at roadside locations more recently. The Local Plan policies may make a contribution to this, but wider measures are necessary since this is a London wide problem.

### Likely evolution without a Local Plan Review

Air quality is influenced by a wide variety of factors other than Local Plan policies. Traffic and building works are the major sources of air pollution in the City. Reductions in either of these factors may prompt an improvement in air quality. The City of London is within the Ultra-Low Emission Zone (ULEZ), which came into effect in 2019. An extension to ULEZ up to the North and South Circular in October 2021 may indirectly improve air quality in the City by reducing air pollution across a much wider area of London.

### Context and baseline – transport emissions and infrastructure

5.6. The main contributor to local air pollution is road traffic. Diesel vehicles, in particular taxis, buses and vans contribute the largest proportion. Offices make up over 70% of all buildings in the Square Mile and many of the vehicles in the City are servicing business needs. Figure 27 shows modelled concentrations of NO<sub>2</sub> across the City for 2020 using data from the 2013 London Atmospheric Emissions Inventory. This shows that concentrations of nitrogen dioxide adjacent to busy roads and junctions can be three times that experienced in the City away from such roads.

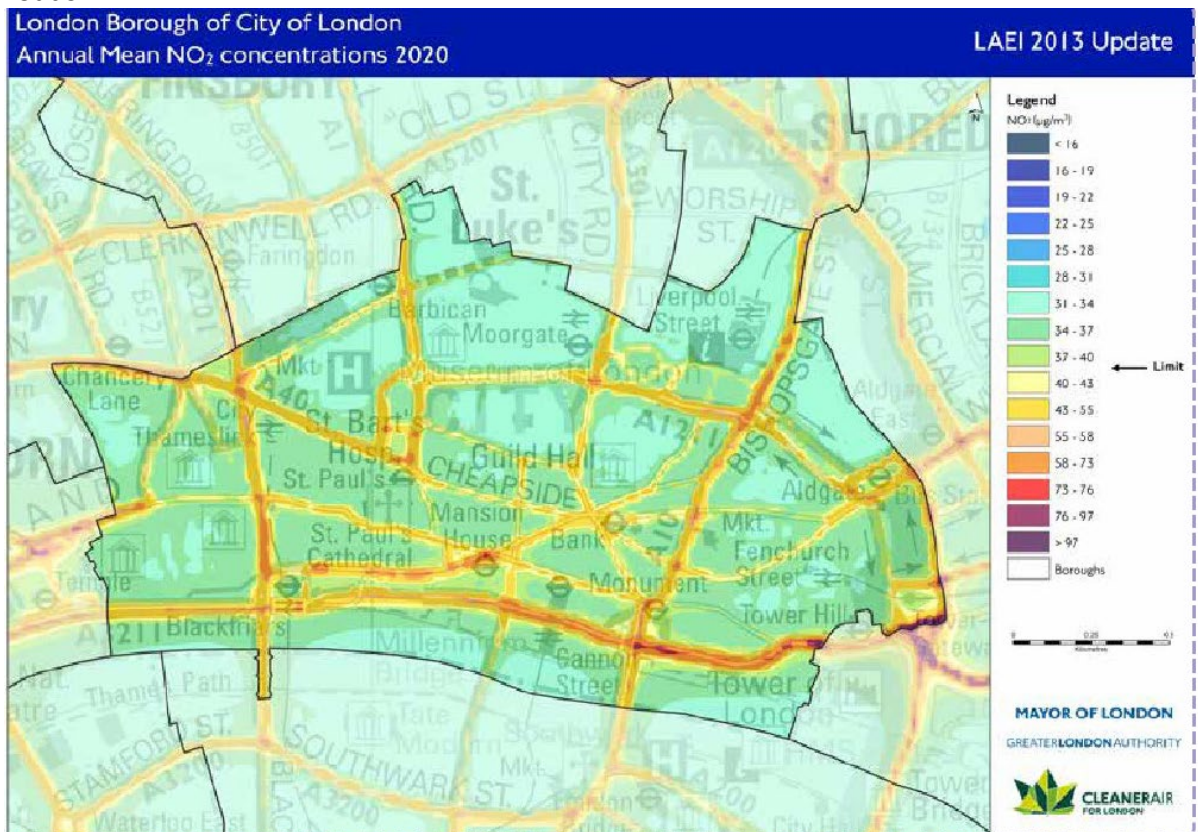


Figure 27: NO<sub>2</sub> concentration modelling for 2020 (pre-pandemic)

5.7. Public transport upgrades, the introduction of cleaner vehicles, the use of the River Thames for transport and encouragement of active transport modes such as walking and cycling, will all make a contribution to reducing air pollution associated with transport in the City. Count data from 2019 compared to count baseline data used to

inform the City of London Transport Strategy’s key performance indicators, finds that van and pedal cycle volumes have increased, while volumes of all other modes have decreased, with a decline for 7% in motor traffic volumes between 2017 and 2019 baseline values, and a corresponding increase in 11% of people cycling, highlighting success of current strategies for encouraging active transport modes.<sup>x</sup>

- 5.8. The Elizabeth Line opened in May 2022, and runs through central London, connecting all the way across the capital from Heathrow Airport and Reading to Shenfield and Abbey Wood. The Line has four stations in the City of London, at Farringdon, Barbican, Moorgate, and Liverpool Street, providing additional public transport capacity, particularly to central London’s rail network, thereby reducing congestion and encouraging active travel to and from stations. Data from the TfL reveals that ridership on the line is above expected levels, with around 600,000 journeys made each day, making it one of the busiest lines in the UK.<sup>xi</sup>
- 5.9. Despite the success of The Elizabeth Line, overall activity on the TfL underground remains below pre-pandemic levels, illustrated by total usage being down 32.85% in May 2023 from pre-pandemic levels<sup>xii</sup>. However, there is a consistent trend towards an increasing usage of the underground as shown in the below figures.

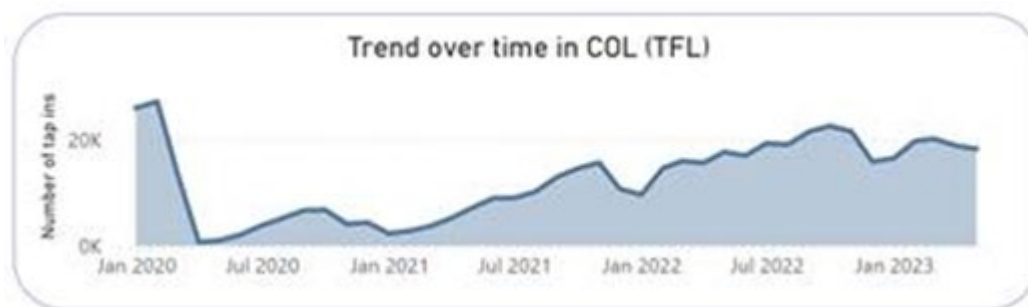


Figure 28: Transport for London underground usage trend overtime (2023)

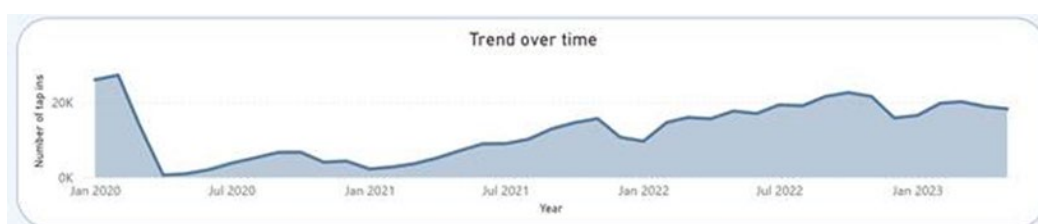


Figure 29: TFL Underground average daily number of tap ins across all City of London stations (2023)

- 5.10. It is unlikely for these figures to reach pre-pandemic levels owing to the reduced workplace and recreation activity in the City of London since the pandemic, activity which has not recovered to the same extent as TfL Underground usage as shown in the below figures. It is likely this trend is a result of changing working patterns that have arisen since the pandemic, such as working from home becoming a more common practice.

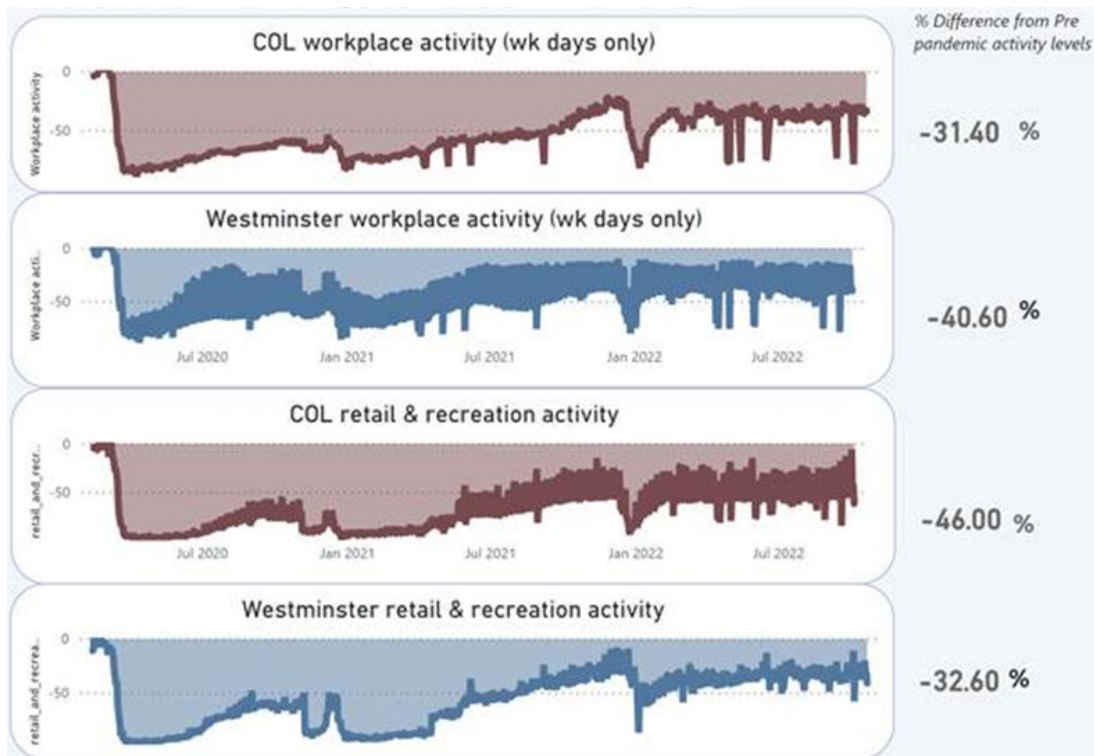


Figure 30: Google mobility data for City of London and Westminster (2023)

- 5.11. Alongside action to reduce levels of pollutants, it is important to reduce people's exposure to poor air quality. This can be achieved through a number of measures including greening and street tree planting, provision of traffic free routes, and provision of air quality information to enable vulnerable individuals to make informed choices. The London wide nature of this problem requires co-ordination of actions across a wider area. It is important that actions taken within the city or any individual borough do not have unintended consequences elsewhere.

**Progress against previous SA objective – transport emissions and infrastructure:**

Objective: Reduce the negative effect of transport on the environment

- Numerous highways schemes and environmental enhancement schemes have been carried out in the City during the period from 2012. Public realm enhancement schemes have been implemented or proposed across the City. Many of these aim to improve the street environment making more space for pedestrians and cyclists.
- The implementation of highway and environmental enhancement schemes have contributed to a reduction in people's exposure to poor air quality by widening pavements, creating traffic free environments and using planting to screen open spaces from roads.

- Major strategic transport projects such as the Elizabeth Line, Thameslink and the Northern Line/ Bank Station upgrade have been completed and are delivering additional public transport capacity to, from and through the City. TfL reported increasing passenger numbers across all public transport modes during the period 2006-2023.

### **Commentary**

Local Plan policies on planning contributions provide a proportion of the funding for necessary highway and environmental enhancement programmes. It will be important to ensure that future schemes continue to address exposure to poor air quality. Support for major transport infrastructure projects has long been a feature of planning policy in the City.

### **Likely evolution without a Local Plan Review**

Additional public transport capacity is now available as a result of the Elizabeth Line opening, and further capacity will come on stream through the Bank Station upgrade. The City of London is within the Ultra-Low Emission Zone, which came into effect in 2019 and was extended in 2021.

## **6. Climate**

### **Context and baseline – carbon emissions**

- 6.1. Energy consumption and the consequent emissions of carbon dioxide are of significant importance to the City of London and have a contributory impact on climate change. The location, siting, design and construction of built development together with economic and social activities can have an effect on energy consumption and subsequent greenhouse gas emissions and this can be influenced by planning policies for both new and refurbishment of existing development.
- 6.2. It is important to consider the overall energy consumption and carbon dioxide emissions in the City to see whether the policies that are in place are having a positive effect on longer term trends. Figure 31 shows carbon emission figures for the City of London for 2005-2020 and demonstrates that commercial use accounts for the greatest proportion of emissions. Overall carbon emissions in the City have decreased significantly during this period, particularly in more recent years. Total carbon emissions for the City in 2020 meet the GLA's target of 60% reduction in carbon emissions by 2025.



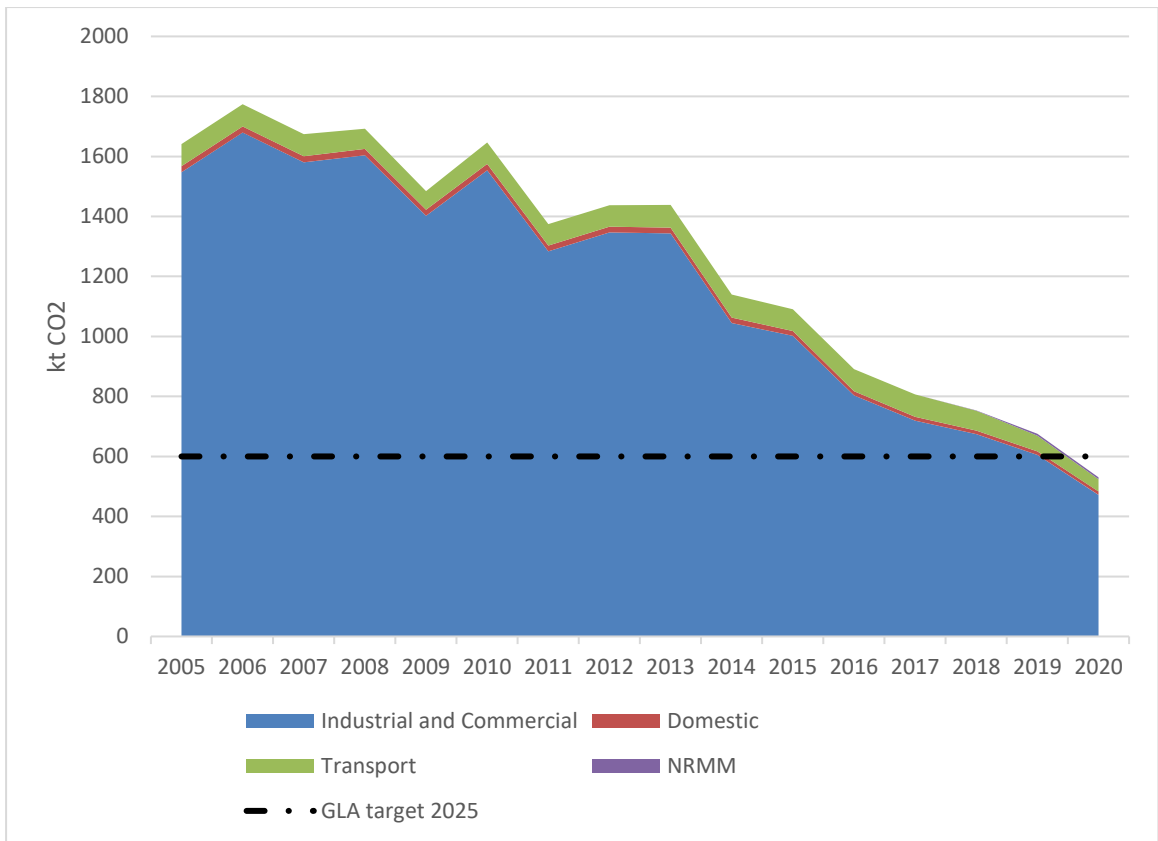


Figure 31: City of London carbon emissions (kt CO<sub>2</sub>) 2005-2020

6.3. In the latest available emissions data (2020)<sup>xiii</sup>, industrial and commercial, and transport remain the two biggest emitters, with commercial now making up 90%. However, there has been a 60% reduction in carbon emissions since 2012.

### Progress against previous SA objective – carbon emissions

Objective: To reduce activities that exacerbate climate change

- After several years of gradual reductions in CO<sub>2</sub> emissions from the City with annual fluctuations, there has been a significant downward trend since 2012.
- Energy strategies show that many new developments are achieving the London Plan target of a 35% improvement over the 2013 building regulations.

### Commentary

Local Plan policy CS15 promotes CO<sub>2</sub> emission reduction. This may have contributed to the trend towards lower carbon emissions from new and refurbished developments in the City. The gradual reduction in CO<sub>2</sub> emissions between 2005 and 2013 corresponded with a period that included a significant recession, while the more significant reductions since then are likely to be associated with decarbonisation of the National Grid. Further reductions in CO<sub>2</sub> emissions correlate with the pandemic which restricted global mobility and hampered economic activity. CO<sub>2</sub> emissions continued to decrease post-pandemic, with a recorded 31% reduction

of emissions, against a target of 33% in 2022, and a slight reduction in floorspace. Continued monitoring will establish whether the expansion of floorspace and the post COVID-19 recovery will affect this downward trend.

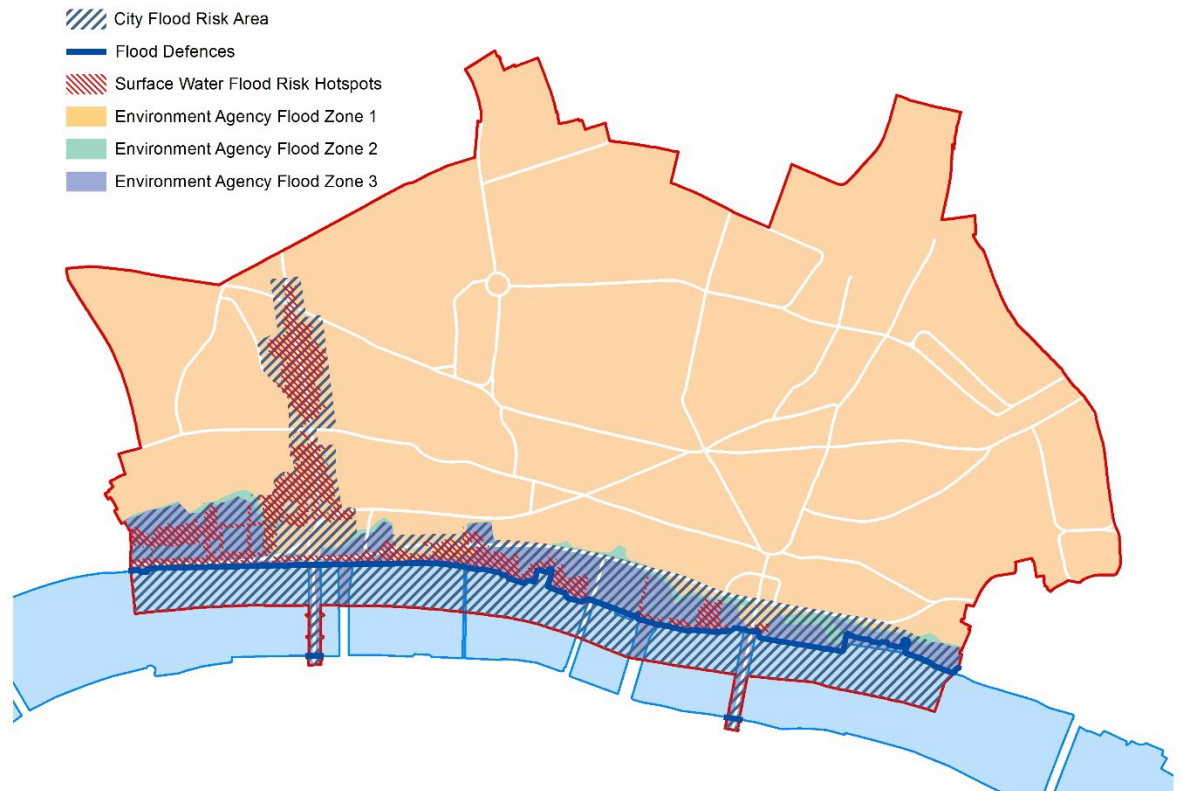
The City of London's Climate Action Strategy (2020) sets out how the organisation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally. The City of London has shown a reduction of 20% of emissions over the last year through changes, including a programme of energy reduction interventions, changes to our building stock, and better control of our energy usage using the Building Energy Management System (BEMS). This Strategy will continue to see a reduction in CO<sub>2</sub> emissions to facilitate the 2027 target of net zero carbon emissions from City of London operations and the 2040 target of net zero carbon emissions from the entire Square Mile.

#### **Likely evolution without a Local Plan Review**

A reduction in carbon emissions per square metre of floorspace must be set against overall increases in floorspace in estimating future emissions for the City. Large increases in floorspace that are currently approved may slow down the reduction of emissions, although new buildings are increasingly energy efficient. Strengthening of building regulations, decarbonisation of the grid, stricter vehicle emissions standards and the adoption of stronger sustainability policies in the London Plan will all assist to reduce carbon emissions.

### **Context and baseline – climate change adaptation and resilience**

- 6.4. Despite efforts to reduce carbon emissions, some level of climate change is now inevitable. The likelihood is that summers will become hotter and drier, winters wetter and warmer and we will experience more frequent extreme weather events. Figure 32 shows the areas of the City that will be most vulnerable to flooding as a result of climate change.



**Figure 32: Areas at risk of flooding in the City**

- 6.5. In order to increase the City's resilience to flooding, green roofs and other sustainable drainage features can play a part in slowing down rainwater run-off from buildings, reducing the risk of surface water and sewer overflow flooding.
- 6.6. According to the City's Strategic Flood Risk Assessment (2017)<sup>xiv</sup>, the fluvial and tidal flood zones have not changed since the 2012 SFRA, with the southern part of the City of London in the immediate vicinity of the River Thames, being the only area at risk. The City of London is protected by the wall along the River Thames and the Thames Barrier. A review of the surface water flood risk modelling available has concluded that the modelling undertaken in the 2012 SFRA remains the best available assessment of risk, providing a conservative approach due to the large uncertainty in prediction. The significant risk areas within the City of London therefore are still Farringdon Street, New Bridge Street, Victoria Embankment and St Paul's Walk. New modelling of the risk of flooding from breach of the River Thames tidal flood defences has, however, increased the areas at risk from breaches.
- 6.7. Groundwater flood risk is not expected to increase in the short to medium term. However, climate change is likely to increase the existing groundwater flood risk due to higher rainfall, and increased leakage from drains and sewers infiltrating into the ground. Sea level rise will increase the water level within the River Thames which will also increase groundwater levels, although this will dissipate with distance from the river. Additionally, the defence improvements by the Thames Estuary 2100 Plan and Thames Barrier may help to mitigate this.

## Progress against previous SA objective – climate change adaptation and resilience

Objective: Climate change adaptation

- Comprehensive monitoring of climate change resilience measures has not been carried out. However, some elements such as the inclusion of green roofs in development schemes, which reduce flood risk and over-heating, has been monitored. The City of London has 34.24 ha and 56,800sq.m of total green roof space, and there are currently over 100 green roofs in the City.<sup>xv</sup>

### Commentary

Flooding, both fluvial due to sea level rise and surface water, and the urban heat island effect are two main issues which could affect the City in the future. Local Plan policies encourage the different uses of Sustainable Drainage Systems (SuDS) and highlight the need for flood defence raising to combat the effects of sea level rise. Urban greening is also promoted, which will help alleviate overheating.

The City of London's Riverside Strategy (2021) outlines the management of river flood defences within the Square Mile. The strategy offers a framework for enhancing and elevating flood defences, as well as for the continual enhancement of accessibility along the entire riverside, while also aligning with the Thames Estuary 2100 Plan (TE2100).

### Likely evolution without a Local Plan Review

More extreme weather events as a result of climate change may result in higher flood risk for the City, which is vulnerable to sewer surcharge flooding in some locations, during periods of heavy rainfall. Implementation of different SuDS schemes may have a beneficial effect in the longer term.

## 7. Material assets

### Context and baseline – economic development

- 7.1. Offices are the predominant City land use. It was estimated that as at 31 March 2022, there was 9,440,000 million m<sup>2</sup> of gross office floor-space within the City, estimated to rise to 9,630,000 m<sup>2</sup> in 2025/26 . For the period 2020/21 to 2025/26, a considerable amount of new development will be delivered within the Eastern Cluster. Post 2025/26, there is projected to be a significant delivery of office floorspace.

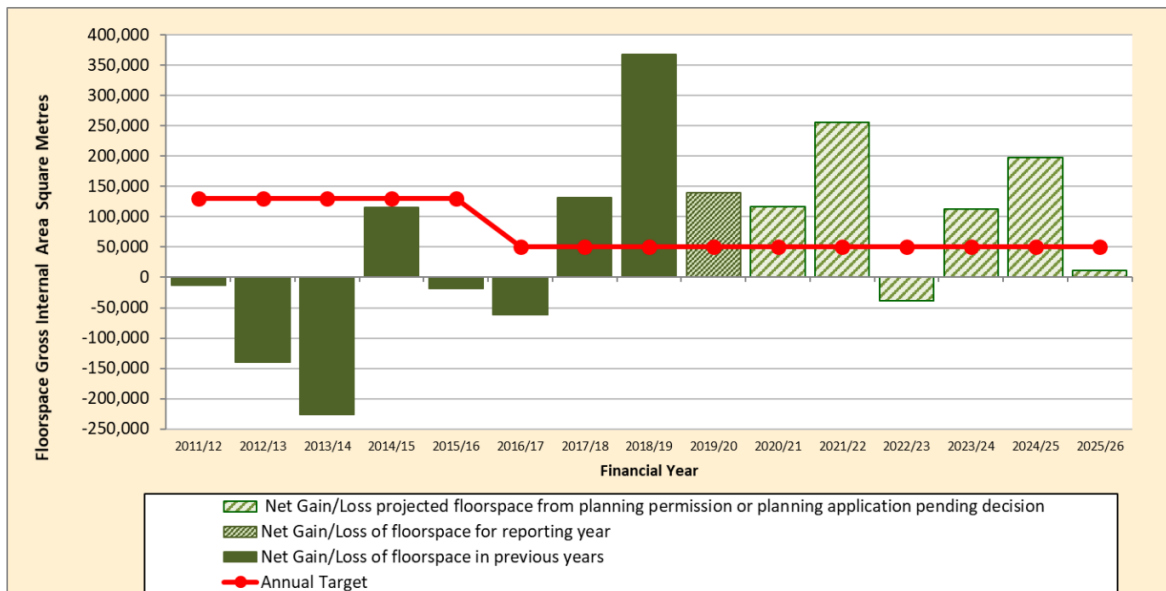


Figure 33: Office Floorspace Trajectory for the City of London

- 7.2. Other main land uses are transport, open space, housing, retailing, utilities, public buildings, hotels and visitor attractions, education and health. Indeed, within the Thames Policy Area, and some of the Conservation Areas that are characterised by small-scale properties, a range of small-scale redevelopment schemes involving change of use from office use to either hotels or housing has taken place. However, the amount of office floorspace lost in such schemes has been small in comparison to the delivery of additional floorspace through large-scale office development schemes<sup>xvi</sup>. The type of companies occupying City office space has changed over time. Financial services and professional services remain the two largest sectors in the City overall. 10% of Greater London’s employment or 1 in 54 of the UK’s workforce are employed in the City.<sup>xvii</sup>
- 7.3. The Corporation recently commissioned an assessment<sup>xviii</sup> of their office market, covering current and anticipated office-use behaviours, the qualitative and quantitative demand for net additional office floor space and an assessment of the extent of risk of stranded assets. According to this research, City-based office jobs and office attendance are expected to grow in the future. Traditional office jobs are the dominant sector in the Square Mile, representing 59% (346,000) of all jobs in 2021. However, emerging office-based firms are faster-growing with 41,600 new jobs (+80% from 51,700 to 93,300) between 2015 and 2021 compared to a 25% increase over the same period for traditional office-based jobs. According to estimates based on GLA and ONS data, the number of office workers in the City should grow by a further 73,000, up to 2040. Emerging office-based firms (information and communication and professional, scientific and technical activities)

are tending to value different typologies of office spaces including more agile working environments with lower workplace densities and higher-amenity offices.

- 7.4. Further to this, the Greater London Authority projects significant growth in the financial and business sector in the medium to longer term. Between 2021 and 2041 the GLA’s 2022-based projections indicate a growth of 66,000 jobs in the City of London, which will subsequently see an increase in floorspace in the City. Office stock in the City is continually updated to accommodate the City’s growth projections and to accommodate businesses’ technological requirements, ensuring that it remains at the competitive edge. Whilst there are pockets of residential areas in the City where additional housing is proposed to contribute towards housing needs, this will be managed to ensure that the City forms a business cluster of commercial office space of national importance.
- 7.5. The COVID-19 pandemic had a significant economic impact on the City’s economy, but the economy is expected to grow post pandemic. The forecast employment for 2021 and 2022 in London’s key sectors is detailed in Figure 34.

Sector	2020 % change	2021 % change	2022 % change
Financial and Business Services employment	-1.1	-5.0	3.4
Distribution, Accommodation and Food Service Activities employment	-3.2	-5.5	3.5
Transportation and Storage employment	-6.1	-5.3	3.4
Other (public and private) Services employment	1.7	-2.9	1.9
Manufacturing employment	2.3	-6.0	2.9
Construction employment	-6.5	-6.4	3.3
Non-manufacturing employment	-1.2	-4.6	3.0

Figure 34: GLA Economics Forecast for London’s key employment sectors.

- 7.6. Data presented in Figure 34 relates to London’s key employment sectors, however the most relevant to the City of London is the financial and business services employment. 2020 witnessed a fall of 1.1% in this sector’s employment. It is projected that this trend will continue in 2021 with a drop of another 5% in comparison to the previous year. However, in 2022, it is forecast that financial and business services employment will return to growth of approximately 3.4%.
- 7.7. In terms of historic and forecast gross value-added outputs by sector, the changes are presented in Figure 35 below.

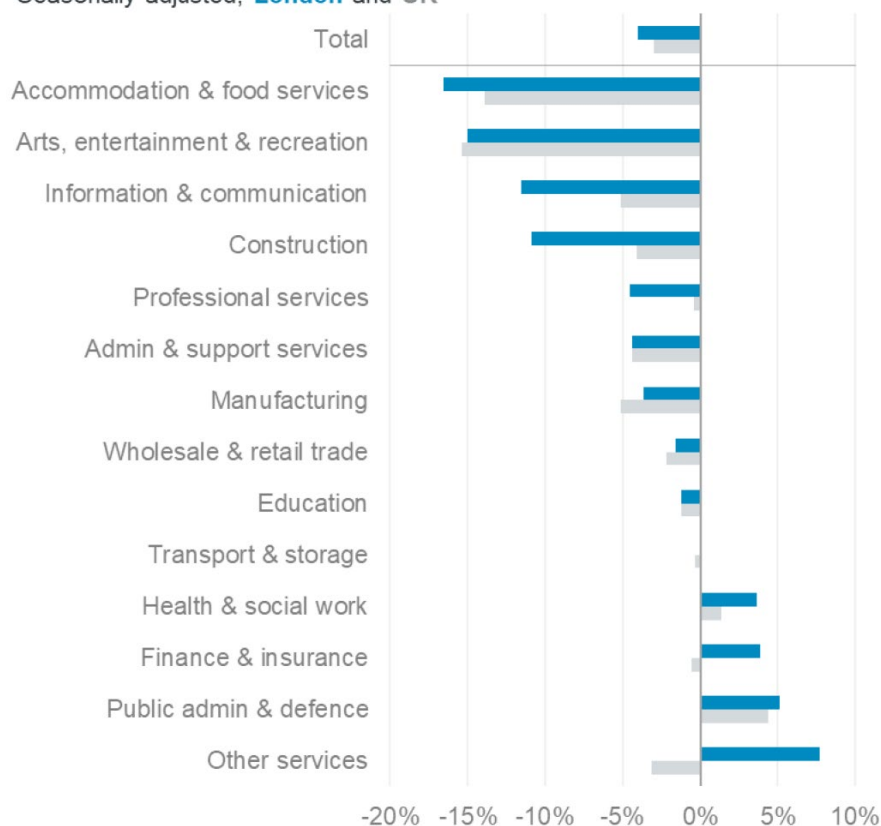
Growth Rates	2010	2018	2019	2020	2021	2022
Gross value added at basic prices (2016 KP)	2.6	2.3	5.1	-9.5	6.2	6.9
Financial and Business Services Output	3.1	3.0	6.6	-5.0	5.5	6.1
Distribution, Accommodation and Food Service Activities Output	0.4	3.9	7.3	-19.4	8.1	10.5
Transportation and Storage Output	0.3	-3.1	-0.5	-19.5	12.0	12.0
Other (public and private) Services Output	0.8	0.9	3.7	-15.3	5.7	5.7
Manufacturing Output	3.3	-3.9	2.5	-11.6	4.8	9.0
Construction Output	12.9	-0.5	0.9	-19.6	9.6	11.9

**Figure 35: Historic and forecast growth rates for key sectors in London by output (2010 – 2022).**

- 7.8. Figure 35 presents growth rates of London’s key sectors. For the City of London, the most relevant sector is financial and business services. This sector has experienced a drop of 5% in its outputs in 2020, in comparison to its strong 6.6% growth in 2019. However, it is projected that financial and business services outputs will grow by 5.5% in 2021 and by an additional 6.1% in 2022.

**Percentage change in Workforce Jobs by selected industry groups between March 2020 and March 2021**

Seasonally adjusted, **London** and UK



**Figure 36: Percentage of change in workplace jobs between 2020 and 2021**

- 7.9. Figure 36 presents growth rates of workplace jobs in London compared to the rest of the UK between 2020 and 2021. The financial and industrial sector saw a 4.7% increase in workforce jobs, which indicates the bounce-back of London’s economy post COVID-19.
- 7.10. Moving forward, office jobs in the City are projected to continue growing, with the GLA forecasting an additional 85,000 jobs (or +13%) in the City by 2042<sup>xix</sup>.

**Progress against previous SA objectives – economic development:**

Objective: Encourage growth in the City’s financial and business services  
 Objective: Maintain and, where appropriate, encourage growth in non-financial economic sectors.

- Employment numbers in the City stood at 331,900 in 2009, growing steadily to 522,500 in 2018 and further to 591,000 in 2021.
- In 2022, the City of London contributed around £85 billion in GVA to the UK’s national income, which is 3.5% of the UK’s output and 15% of London’s output.



City output has risen about 5% per year over the 7 years to 2021, compared to 3.5% for the UK.

- There were nearly 1,000 new start-ups in the City in 2019, which is slightly more than in 2018.

### **Commentary**

The Local Plan sets a target to increase office floorspace by 1,150,000 m<sup>2</sup> in the City during the period 2011-2026. From 2011/12-2016/17 there was a net loss in office space due to high levels of demolitions. However, this trend was reversed in 2017/18 and since then there has been a steady increase in office floorspace due to high levels of construction, with nearly 900,000 sqm net increase in floorspace between 2017/18 and 2021/22. The City continues to be a dynamic business environment with high levels of start-ups and productivity levels above the national average.

### **Likely evolution without a Local Plan Review**

The Covid-19 pandemic had a significant, but short term, economic and social impact on the City of London. Post pandemic, economic activity in the City has been on a path to recovery, with the GLA projecting significant employment growth in the period to 2040. Monitoring against the Local Plan floorspace targets will provide essential information on future trends in employment numbers and occupation densities.

## **Context and baseline – built environment**

- 7.11. The development and refurbishment of the City's built environment is key to ensuring that the City continues to provide the environment where businesses want to operate, and residents want to live. The City Corporation monitors the pipeline of developments from approval to completion and reports on progress every six months through its development and population information reports which are published on the City of London website.
- 7.12. In the City of London, the number of tall buildings and associated floorspace permitted and completed during the period 2011/12 to 2021/22 has varied. Four tall buildings were completed in 2018/19. Two tall buildings were completed in 2019/20 and three in 2020/21. There were no further completions in 2021/22, although there are fourteen tall buildings within the development pipeline, seven of which under construction and these are projected to be completed in the next six years. Furthermore, ten of the fourteen tall buildings within the development pipeline are within the Eastern Cluster<sup>xx</sup>.
- 7.13. There were nineteen tall buildings completed over the period 2011/12 to 2021/22, which delivered over 1,186,000m<sup>2</sup> of floorspace.

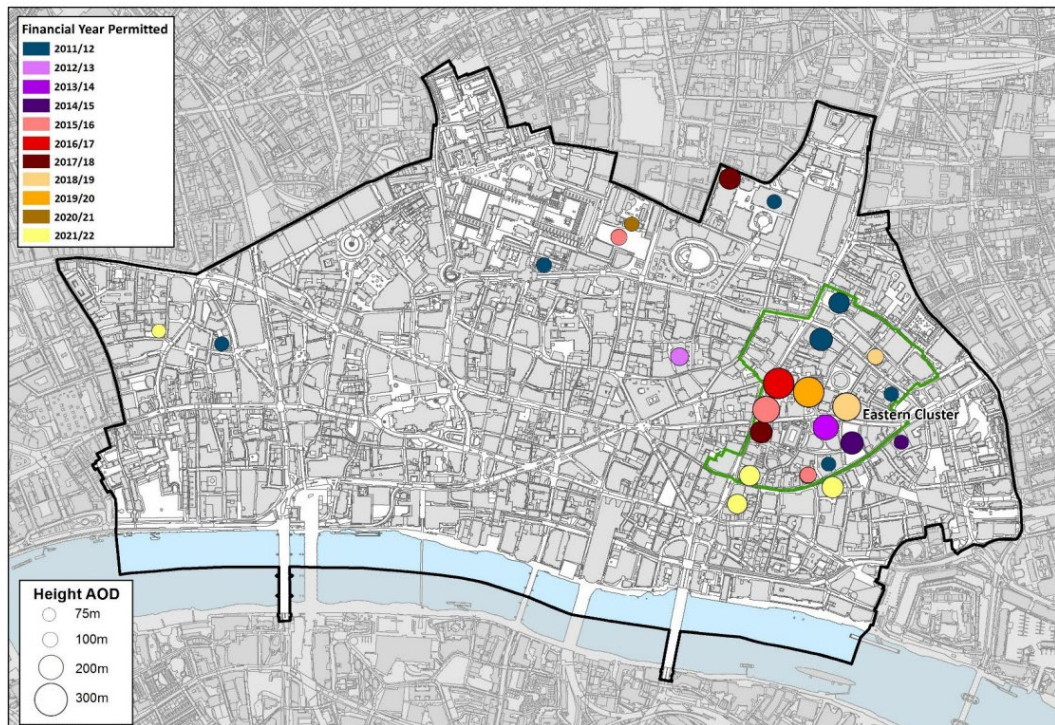


Figure 37: Tall Buildings (over 75m AOD) permitted by financial year (1 April to 31 March)

7.14. Enhancement of the public realm is important in providing the high-quality environment that is fitting for one of the world’s leading financial and business centres. There are a number of Area Enhancement Strategies for the City, the most recent being the City Cluster Vision and Culture Mile Look and Feel Strategy. Along with the City of London’s Transport Strategy, adopted in 2019, they provide the foundation for improvements to streets and spaces in the Square Mile. The Global Financial Centres Index analyses the key factors that make a financial centre competitive. The 2022 rankings of the top five financial centres show that London and New York compete for the highest ranking ahead of Singapore, Hong Kong and San Francisco (Figure 38).

Centre	GFCI 32 rank	GFCI 32 rating	Change in rating
New York	1	760	+1
London	2	731	+5
Singapore	3	726	+14
Hong Kong	4	725	+10
San Francisco	5	724	+13

Figure 38: Average Scores of the leading Global Financial Centres in 2022

### **Progress against previous SA objectives – built environment:**

Objective: Protect, maintain and enhance the built environment of the City incorporating sustainable design and construction methods

Objective: Enhance the attractiveness of the City as a business location

Objective: Ensure that the City is a safe and pleasant place to live and work

- Development and environmental enhancement schemes completed since 2006 have maintained a high-quality environment in the City. Development activity has returned to strong levels in recent years following a downturn at the start of the pandemic.
- London has retained its high ranking in the Global Financial Centres Index in recent years with the City contributing significantly to this assessment.

### **Commentary**

Local Plan policies promote renewal of the City's office stock incorporating good design and requiring high BREEAM sustainability ratings. Planning contributions through S106 and CIL enable public realm improvements associated with new development.

### **Likely evolution without a Local Plan Review**

Improvements in the sustainability and attractiveness of the City will be dependent on continued development providing funding for public realm enhancements.

## **8. Cultural heritage and landscape**

### **Context and baseline – historic environment**

- 8.1. The City of London has a distinct character as a result of its long history being home to some of the most iconic architecture – both historic and modern. This has meant that the City has a townscape of great complexity and diversity. Having developed within just one square mile of land, and having always been a prosperous centre for commerce and finance, development of the City has been intensive and uncoordinated, dictated by the prevailing needs of individual owners or occupiers rather than any masterplan. Subsequently, the majority of the Square Mile is characterised of extreme and endless variety in building style, heights, use and periods.
- 8.2. The City contains a high concentration of heritage assets which include over 600 listed buildings, 27 conservation areas, 48 scheduled monuments and 4 registered parks and gardens within the Square Mile. Many of these heritage assets contribute significantly to the City's skyline, namely St Paul's Cathedral and the Monument, whilst the City also provides part of the backdrop and setting for the Tower of

London World Heritage Site. Today, the City has become internationally famous for its high-rise architecture.

- 8.3. Tall buildings began emerging in the City on completion of Tower 42 in 1981. Until 2009, it was the tallest building in the City, only surpassed in that year by the Heron Tower. Meanwhile, taller buildings began emerging in the east of the City, in the City Cluster, around the vicinity of Bishopsgate and Leadenhall Street. This area remains at the heart of the City’s planning policy for tall buildings and is set to accommodate more, including 120 Leadenhall Street, 22 Bishopsgate and 20 Fenchurch Street.
- 8.4. The City Corporation has published a Historic Environment Strategy and a series of Conservation Area Character Summary and Management Strategies as Supplementary Planning Documents (SPDs). In addition, the City Corporation has published an Archaeology and Development Guidance SPD. The documents are published on the City Corporation’s website.

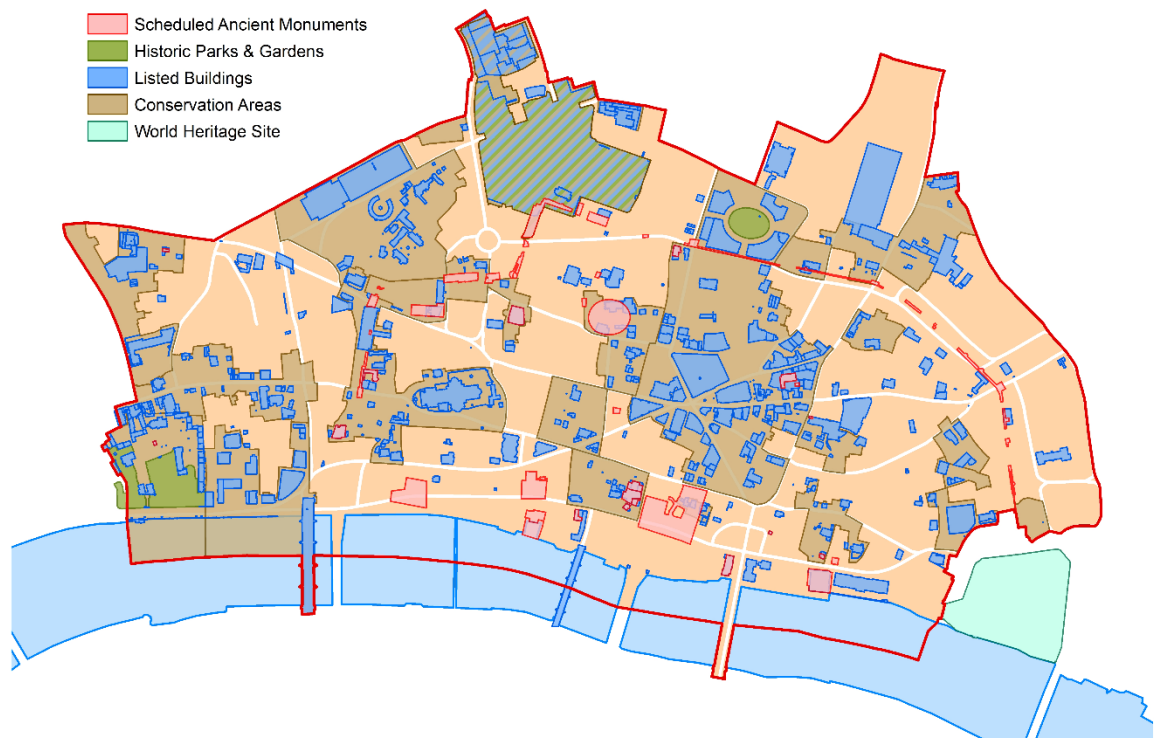


Figure 39: Map showing heritage assets in the City

- 8.5. Historic England’s “Heritage at Risk – London and the South East Register” (2019) lists two buildings as being at risk:

Site Name	Designation	Condition	Priority Category	Owner Type
Church of St Mary Woolnoth, King William Street, City of London EC3	Listed Place of Worship grade I, CA	Poor	C	Religious organisation
Church of St Margaret, Lothbury, City of London EC2	Listed Place of Worship Grade L, CA	Poor	C	Religious organisation

Figure 40: Extract from Historic England's Heritage at Risk Register 2023

- 8.6. The City of London currently has 27 conservation areas. Apart from the Barbican and Golden Lane Conservation Area, these conservation areas are less representative of large-scale post-1945 development, but clearly show the contrast between the traditional and characteristic forms of the City and alternatives adopted later. The Corporation has produced or intends to produce a Character Summary and Management Strategy, a Supplementary Planning Document (SPD), for each conservation area. The SPD for each conservation area identifies and analyses the area's principal characteristics, explains its significance and provides detailed guidance on the City's planning policies. If an SPD has not yet been prepared, there is a separate Character Summary and Management Strategy.
- 8.7. There is a significant contrast between the modern, high-rise eastern parts of the City and the more consistently historic, predominantly low-rise western area. Intense development pressures in the City have significant implications for both individual heritage assets within the City's boundaries, and also for wider historic character in the neighbouring boroughs of Tower Hamlets, Islington, Camden, Westminster, Southwark and Lambeth and beyond. Details of these assets can be found on the Historic England website or through individual boroughs' websites. The Tower of London World Heritage site is of particular importance in this context.
- 8.8. Due to the intense pressures for development, it is important that the City's heritage assets contribute to the functioning of the City through the conversion of underused space to satisfy commercial or social needs, after appropriate consideration of the effects of potential conversion on significance.
- 8.9. There are several non-designated heritage assets in the City which merit consideration in planning decisions.
- 8.10. With regard to landscape, the City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's

Heights' code since the 1930s. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's "world class" status. As such the City of London seeks to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of City landmarks. The vulnerability of these three highly significant strategic landmarks to further growth in the City of London, including through tall buildings, is summarised below.

### **St Paul's Cathedral**

8.11. St Paul's Cathedral is a grade I listed building and one of the nation's most famous landmarks. It was London's first cathedral and has become one of the best known examples of classical architecture in Britain. It is of outstanding national and even international heritage significance. Of all the views of and ways to the Cathedral, the Processional Route is the most prestigious and unique. As such, it makes a very high contribution to the overall significance of St Paul's Cathedral and its setting. The conservation and enhancement of the Processional Route and its views are therefore of fundamental importance to London's image as a city. A summary of potential vulnerabilities of St Paul's Cathedral to tall buildings is summarised below:

- Disruption of the existing highly sensitive architectural hierarchy with the churchyard.
- Loss of pristine sky setting to the Cathedral's silhouette.
- Loss or intrusion into views towards the Cathedral along the Processional Route.
- Unbalancing of the Cathedral's primary status within skyline views from the river and bridges.
- Disruption of the relationship between the Cathedral and City churches.
- Erosion of the extent of visible fabric of the Cathedral.
- Diminishment of Wren's architectural composition through encroachment within views of the Dome.

### **The Monument to the Great Fire of London**

8.12. The Monument to the Great Fire of London, commonly referred to as The Monument, is a scheduled monument and grade I listed building. It is one of the largest free-standing classical columns in the world. It is of exceptional architectural and artistic historic significance as a City and London-wide landmark. The setting of the Monument makes a considerable contribution to its significance. This contribution is particularly enhanced by the Monument's function as a viewing gallery and as such the Monument can be considered to draw specific interest from its location and proximity to the City centre and riverside. The Monument has a general skyline presence from South Bank and its use as a viewing platform provides panoramic views over the Thames. A summary of potential vulnerabilities of the Monument to tall buildings is summarised below:

- Loss of prominence within views from the South Bank and perceptible relationship with steeples of London.
- Occlusion or loss of clear sky setting or prominence within views from the Wren era, signalling arrival into the City.
- Occlusion within or loss of clear sky setting or prominence within nineteenth century views, particularly along Monument Street.
- Loss or diminishment of visibility within distant views of the orb, seen as part of the wider skyline from the river and further afield.
- Occlusion of or overly dominant intrusion within views from the Monument viewing platform.

## **Tower of London**

8.13. The Tower of London is a UNESCO World Heritage Site, scheduled monument and comprises numerous listed buildings. It is of extraordinary importance to the story of the City and the nation more widely. It is one of the most famous structures in the UK, built to guard the seaward flank of the City – the place from which trade and riches flowed – and to assert William the Conqueror’s authority over a City that was uniquely prosperous. The Tower of London is a monument symbolic of royal power and contains the White Tower, which is one of the most famous castle keeps in the world. The World Heritage Site Management Plan further defines the significance of the Tower through identifying specific ‘attributes’ of Outstanding Universal Value. A summary of potential vulnerabilities of the Monument to tall buildings is summarised below:

- Dilution of the iconic status of the White Tower, through an encroachment within views of its open sky setting, or occlusion of its silhouette.
- Disruption to the existing architectural hierarchies appreciable in views towards the Tower from the river and South Bank.
- Interruption of invisibility to and from the river and along its length, including any erosion of the open quality of these vistas.
- Loss of views from Tower Bridge or the Shard where the concentric defences are appreciable.
- Erosion of a sense of curation, emphasis and composition within views of the City Cluster, where the tower and cluster are appreciated together.
- Diminishment of the distinctive materiality of the Tower, and its arresting ‘white’ facades.
- Loss of views from the wall-walks to the surrounding City centre.
- Competition with the Tower in its local setting, disrupting the existing hierarchy where it is appreciated as the principal structure.

8.14. The City Corporation has successfully protected views of St. Paul’s Cathedral through the St. Paul’s Heights policy for over 80 years, and as of 31 March 2020 there were no further refurbishment schemes under construction, or permitted but not commenced, that had other infringements of the height limits imposed by the St Paul’s Heights Policy.

- 8.15. Local views policy and indicative viewpoints are set out in the figure below. This comprises the St Paul's Heights Policy Area (showing the key viewpoints), Monument Views and Setting (showing the five views), and the Tower of London World Heritage Site and Local Setting Area (showing representative viewpoints).
- 8.16. There were 63 completed schemes within the Protected Views Policy Areas in the period 1 April 2011 to 31 March 2020, of which six were completed between 1 April 2019 and 31 March 2020. These included the redevelopment of: (1) 15 St Swithin's Lane; (2) Sugar Quay, Lower Thames Street; and (3) 100 Minories.
- 8.17. In addition to local views, strategic views of St Paul's Cathedral and the Tower of London are protected through the London Views Management Framework.

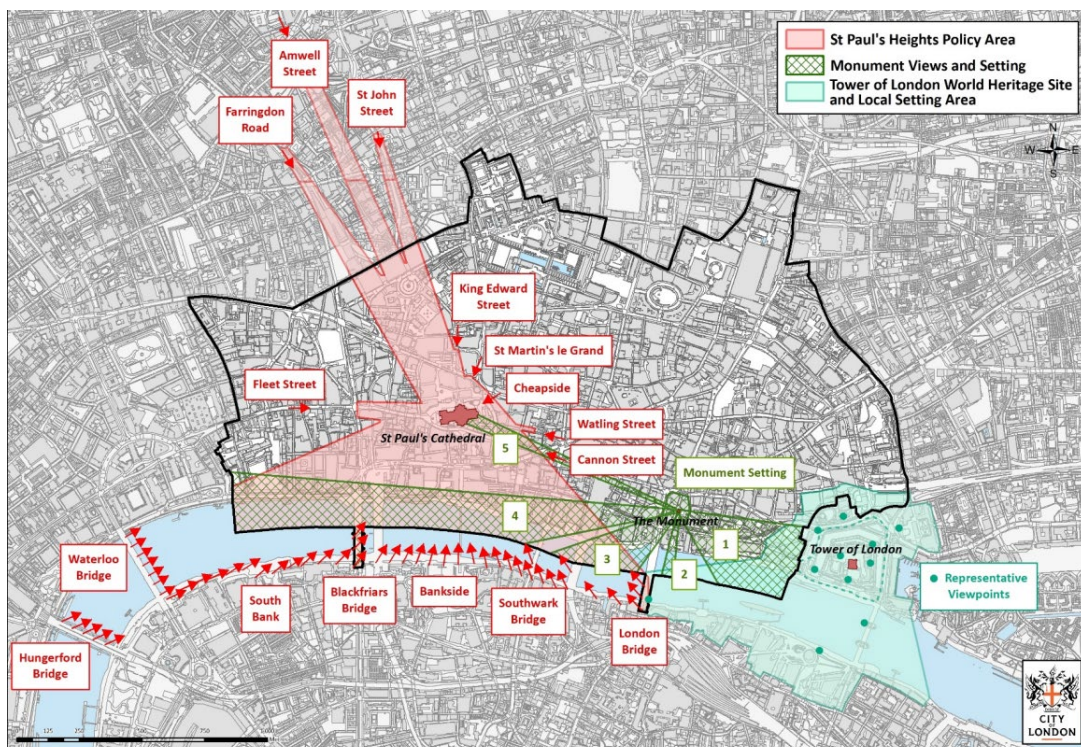


Figure 41: Local view policy areas and indicative viewpoints



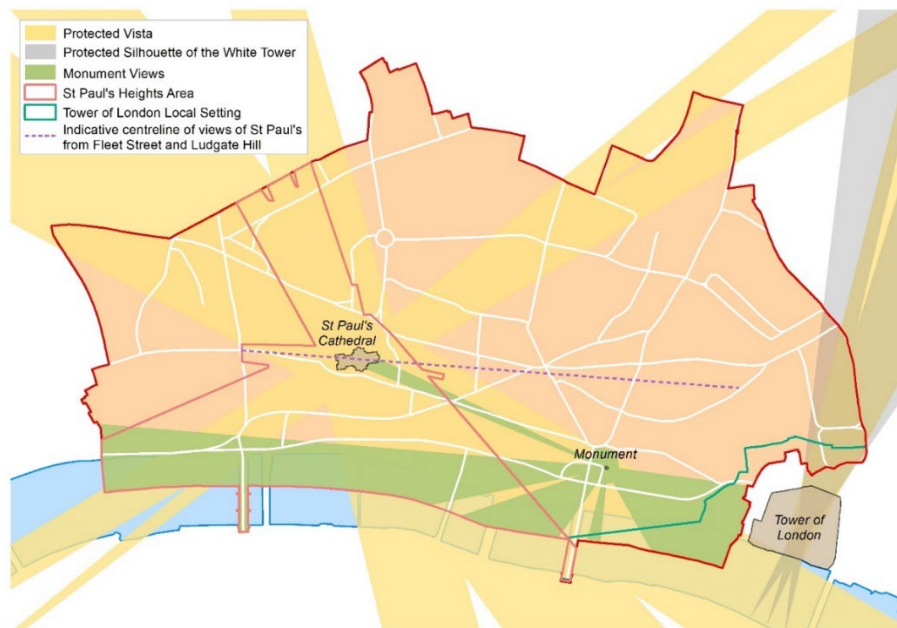


Figure 42: City of London Protected Views

### Progress against previous SA objective – historic environment:

Objective: Conserve and enhance the historic and archaeological environment:

- The City aims to ensure protection of the significant features of listed buildings whilst encouraging viable uses for these buildings. Planning permissions have been granted for changes of use of listed buildings to accommodate leisure, residential and hotel uses.
- There has been significant redevelopment and refurbishment within conservation areas in the City during the last 10 years. However, the City of London Corporation continues to preserve, safeguard, and protect heritage assets, and the character of Conservation Areas, with adaptations made to heritage assets consistent with the conservation and significance of those assets.

Major archaeological excavations accompany many City development schemes and transport infrastructure projects such as Crossrail.

#### Commentary

Local Plan Policy CS12 provides protection for heritage assets whilst development management policies and Conservation Area Character Summary and Management Strategies provide further guidance on the significant features in these areas. The scale and intensity of development in the City requires careful consideration of the impact of development proposals on the City's rich heritage.

#### Likely evolution without a Local Plan Review

The historic environment in the City would continue to benefit from protection in line with the NPPF, London Plan and existing Local Plan requirements. However, the

development of tall buildings which are defined as over 75m in the City of London has increased significantly over the last decade. It is therefore possible that continued development could have adverse effects on the City's unique character as detailed above if careful consideration is not given to the City's rich heritage.

## 9. Waste

### Context and baseline – waste arisings

9.1. Figure 43 sets out City of London's waste analysed by type of waste by year for the period 2012-18. The high levels of development in the City are reflected in the dominance of construction and demolition waste over other forms of waste.

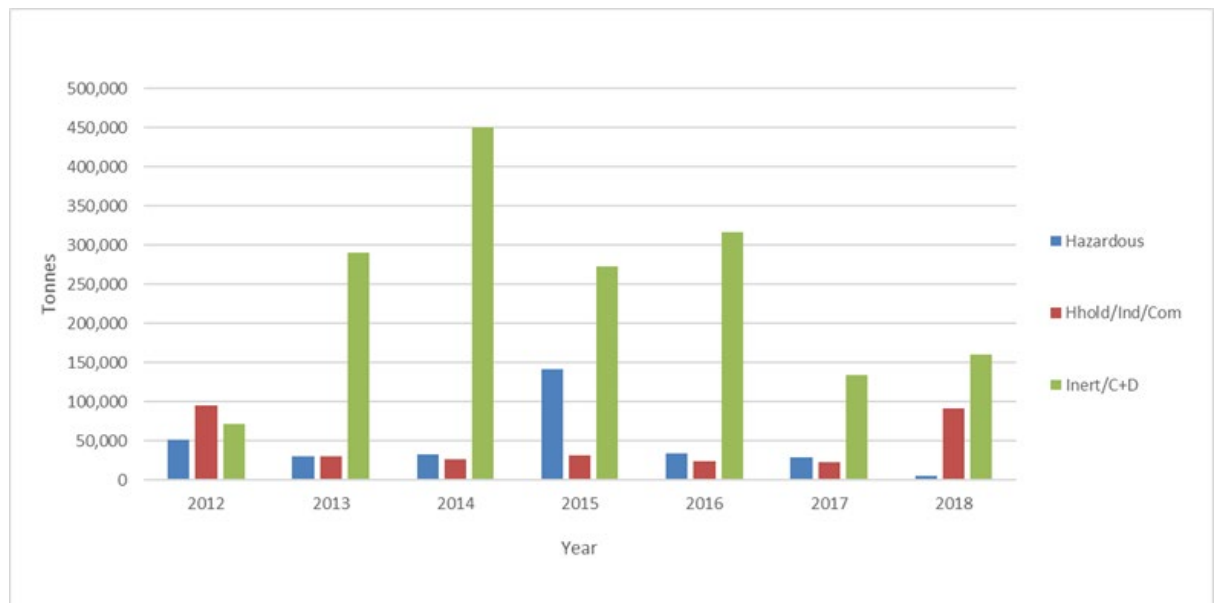


Figure 43: City of London type of waste (tonnes) by year (2012-2018)

9.2. The City exports all of its waste elsewhere for treatment. Around 50,000 tonnes per annum is transported by river from Walbrook Wharf with the remainder going by road to waste management facilities elsewhere in London and south east England. In contrast to many local authorities, a significant proportion of waste in City of London is of a commercial rather than domestic nature and is managed by private contractors. Figures 44 and 45 show the destinations for the City's waste.

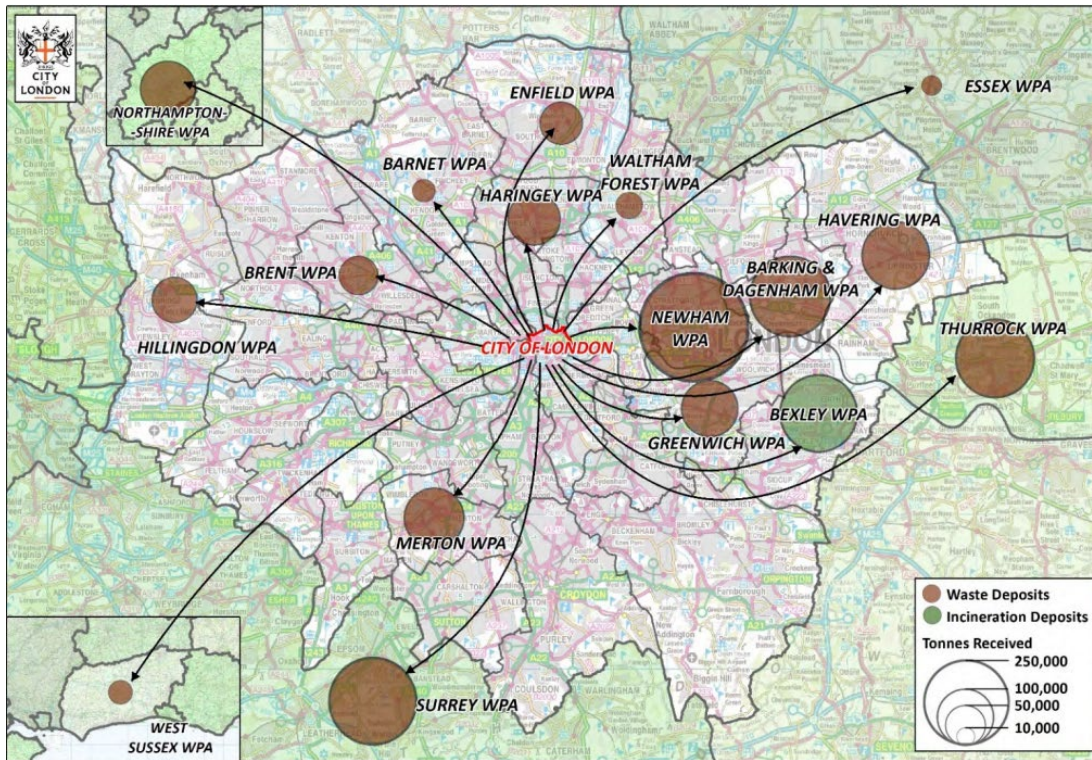


Figure 44: Spatial Distribution of City of London Waste Deposits 2012-2019

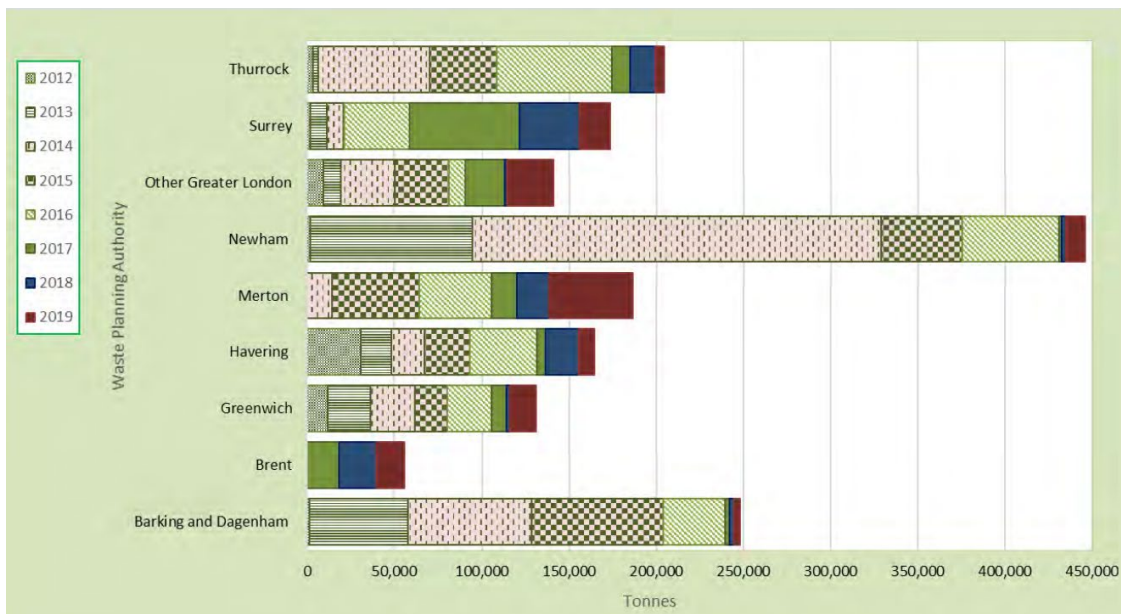


Figure 45: Destination of City of London Inert/construction and demolition Waste Deposits analysed by Waste Planning Authority for the period 2012 to 2019

**Progress against previous SA objective – waste arisings:**

Objective: To adopt the waste hierarchy in all activities

- Monitoring of waste arisings in the City is problematic because the majority of the City’s waste is commercial rather than household waste and is managed by private contractors.

- Figures for the City’s waste fluctuate from year to year. It is not possible to link all waste streams with economic cycles, however the increase in construction waste seen in 2014 corresponded with an upturn in development. Since then, there has been a trend of declining waste arisings, albeit that the figures fluctuate annually.

### Commentary

Local Plan policies require the provision of space in buildings for storage and recycling of waste. This assists in managing waste further up the waste hierarchy.

### Likely evolution without a Local Plan Review

It is unlikely that any additional waste management sites will be made available in the City. Waste minimisation and circular economy principles may lead to a reduction in waste per person, but this must be offset against an increase in population and employment numbers.

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<sup>i</sup> World Health Organization (2023). Statement on fifteenth meeting of the IHR (2005) Emergency Committee on the COVID-19 pandemic. (see [https://www.who.int/news/item/05-05-2023-statement-on-the-fifteenth-meeting-of-the-international-health-regulations-\(2005\)-emergency-committee-regarding-the-coronavirus-disease-\(covid-19\)-pandemic](https://www.who.int/news/item/05-05-2023-statement-on-the-fifteenth-meeting-of-the-international-health-regulations-(2005)-emergency-committee-regarding-the-coronavirus-disease-(covid-19)-pandemic))

<sup>ii</sup> Department for Levelling Up, Housing and Communities (2022) *The Levelling Up and Regeneration Bill* (see <https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

<sup>iii</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2022). Dwelling stock (including vacants) (see <https://www.gov.uk/government/collections/dwelling-stock-including-vacants>)

<sup>iv</sup> Office for National Statistics (2023). How life has changed in the City of London: Census 2021. (see <https://www.ons.gov.uk/visualisations/censusareachanges/E09000001>)

<sup>v</sup> Health and wellbeing board – worker health update January 2016

<sup>vi</sup> Nomis Office for National Statistics (ONS) (2021). Labour Market Profile ( see <https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx0>)

<sup>vii</sup> City of London Corporation. (2023). City of London Factsheets February 2023 - The role of financial and professional services in the UK ( see <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>)

<sup>viii</sup> City of London (2023). The role of financial and professional services in the UK (see <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>)

<sup>ix</sup> Thames Water (2019). Water Resources Management Plan 2019 – Executive Summary (see <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>).

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- <sup>x</sup> City of London (2020). CITY STREETS TRAFFIC SURVEY 2019. (see <https://www.cityoflondon.gov.uk/assets/Services-Environment/traffic-in-the-city-2019.pdf>)
- <sup>xi</sup> Intelligent Transport (2023). Elizabeth line exceeds 100 million journeys since May 2022 launch (see [https://www.intelligenttransport.com/transport-news/143613/elizabeth-line-exceeds-100-million-journeys-since-2022-launch/#:~:text=Transport%20for%20London%20\(TfL\)%20has,busiest%20railways%20in%20the%20UK](https://www.intelligenttransport.com/transport-news/143613/elizabeth-line-exceeds-100-million-journeys-since-2022-launch/#:~:text=Transport%20for%20London%20(TfL)%20has,busiest%20railways%20in%20the%20UK)).
- <sup>xii</sup> City of London (2023). City Corporation’s City Intelligence Dashboard.
- <sup>xiii</sup> Greater London Authority (2023). London Energy and Greenhouse Gas Inventory. (see <https://data.london.gov.uk/dataset/leggi>)
- <sup>xiv</sup> City of London (2017). Strategic Flood Risk Assessment. (see <https://www.cityoflondon.gov.uk/services/environmental-health/climate-action/flooding/strategic-flood-risk-assessment?pageIndex=3>)
- <sup>xv</sup> City of London (2021). Local Plan Monitoring Report – Open Spaces and Recreation. (see <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-monitoring-report-open-spaces-2021.pdf>)
- <sup>xvi</sup> City of London (2021). Local Plan Monitoring – Offices. (see <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-monitoring-report-offices-2020.pdf>)
- <sup>xvii</sup> City of London (2023). City of London Corporation City Statistics Briefing January 2023. (see <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>)
- <sup>xviii</sup> Arup and Knight Frank (2023). Future of Office Use.
- <sup>xix</sup> Greater London Authority (2023). London Long Term Labour Market Projections by Borough. (see <https://data.london.gov.uk/dataset/long-term-labour-market-projections>)
- <sup>xx</sup> City of London (2023). Local Plan Monitoring Report – TALL BUILDINGS (see <https://www.cityoflondon.gov.uk/assets/Services-Environment/local-plan-monitoring-report-tall-buildings-2022.pdf>)